

## Communication from Public

**Name:** Jamie T. Hall - Channel Law Group, LLP  
**Date Submitted:** 01/19/2021 02:55 PM  
**Council File No:** 18-1246  
**Comments for Public Posting:** Please find the attached letter on behalf of the Doheny-Sunset Plaza Neighborhood Association regarding the proposed Vacation Rental Ordinance (Council File 18-1246).

# Channel Law Group, LLP

---

8383 Wilshire Blvd.  
Suite 750  
Beverly Hills, CA 90211

Phone: (310) 347-0050  
Fax: (323) 723-3960  
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III  
JAMIE T. HALL \*  
CHARLES J. McLURKIN

Writer's Direct Line: (310) 982-1760  
jamie.hall@channellawgroup.com

---

\*ALSO Admitted in Texas

January 19, 2021

## **VIA ELECTRONIC MAIL**

Mr. Patrick Whalen, City Planning Associate  
City of Los Angeles Department of City Planning  
200 North Spring Street  
Los Angeles, CA 90012  
[patrick.whelen@lacity.org](mailto:patrick.whelen@lacity.org)  
[darlene.navarrete@lacity.org](mailto:darlene.navarrete@lacity.org)

**RE: Comments on the Negative Declaration and Categorical Exemption for  
the Proposed Vacation Rentals Ordinance: ENV-2019-7046-ND,  
ENV-2019-7375, CPC-2019-7045-CA; CF 18-1246**

Dear Members of the City Council:

This firm represents the Doheny Sunset Plaza Neighborhood Association (DSPNA). The City is improperly processing the proposed Vacation Rentals Ordinance (project) using both an Exemption from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines, 15301, Article 19 (Class 1 Existing Facilities) and a Negative Declaration (ND). Not only is the City processing the project using two different types of environmental documents, the City has prepared two different Negative Declarations for the project. The second Negative Declaration was necessitated by significant changes to the project description made on the same day the first Negative Declaration was circulated for public review and comment, thus vitiating the first Negative Declaration, while selfishly failing to notify members of the public and reviewing agencies that the Negative Declaration was no longer valid and that a second Negative Declaration would have to be issued due to recommended changes in the project. As shown in this letter, the City failed to revised the environmental conclusions in the second Negative Declaration to account for the significant changes to the project description, despite the fact that those changes would result in increased impacts due to a substantial increase in the number of allowable vacation rentals in the City, the number of days per year units could be rented, and the likely concentration of those rentals.

This letter documents that the proposed project is not eligible for either a Categorical Exemption or Negative Declaration under CEQA. **Section I** of this comment letter documents the procedural abnormalities in the City's CEQA process and the unstable nature of the project description. **Section II** of the letter explains why a Class 1 Categorical Exemption is inappropriate for the proposed project, and documents that even if a Class 1 Categorical Exemption was appropriate, that exceptions to the use of a Categorical Exemption contained in CEQA Guidelines Section 15300.2 preclude the use of a Categorical Exemption for this project. According to Guidelines Section 15300.2, exceptions include:

#### **15300.2. EXCEPTIONS**

- (a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.
- (b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.
- (c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.
- (d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.
- (e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.
- (f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

As detailed in this letter, the proposed project is not eligible for a Categorical Exemption pursuant to CEQA Guidelines Sections 15332(b) and 15332(c) due to both impacts associated with unusual circumstances and the potential for cumulative impacts.

**Section III** discusses problems with the Negative Declaration, documents the lack of substantial evidence supporting the findings in the Negative Declarations, and Along with **Section II**, provides substantial evidence of the project’s potential to result in significant impacts. **Section IV** explains that because the project as proposed has the potential to result in significant impacts, a Negative Declaration and a Categorical Exemption are not appropriate. CEQA Guidelines Section 15064(f)(1) specifically mandates that:<sup>1</sup>

- (1) If the lead agency determines there is substantial evidence in the record that the project **may** have a significant effect on the environment, the lead agency **shall** prepare an EIR (*Friends of B Street v. City of Hayward* (1980) 106 Cal.App.3d 988). Said another way, if a lead agency is presented with a fair argument that a project **may** have a significant effect on the environment, the lead agency **shall** prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect (*No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68). (Emphasis added)

This is further clarified in CEQA Guidelines Section 15002(f)(1) which states:

- (f) Environmental Impact Reports and Negative Declarations. An Environmental Impact Report (EIR) is the public document used by the governmental agency to analyze the significant environmental effects of a proposed project, to identify alternatives, and to disclose possible ways to reduce or avoid the possible environmental damage.
  - (1) An EIR is prepared when the public agency finds substantial evidence that the project **may** have a significant effect on the environment. (See: Section 15064(a)(1).)
  - (2) When the agency finds that there is **no substantial evidence** that a project may have a significant environmental effect, the agency will prepare a “Negative Declaration” instead of an EIR. (See: Section 15070.) (Emphasis added).

Use of an EIR would also allow the City to consider alternative versions of the proposed project, something that is more appropriate than the issuance of different Negative Declarations for different versions of the proposed project.

## **I. PROCEDURAL ABNORMALITIES AND CHANGING PROJECT DESCRIPTION.**

The stated purpose of the proposed Vacation Rental Ordinance is to allow for housing units that do not serve as primary residences, but are used intermittently as vacation homes and are thus not likely to be rented as long-term housing, to be used for

---

<sup>1</sup> See also 15002(f)(1) and Public Resources Code Section 21082.2(d).

short-term rental purposes. The City is oddly processing the project using both a Categorical Exemption and a Negative Declaration. Over the course of the last year, the proposed project has changed in ways which increase the potential for project impacts. Changes in the project description have resulted in the issuance of two Negative Declarations for the proposed project, one in December of 2019 and the second in June of 2020, but the notices for the two versions of the Negative Declaration did not provide project descriptions that were sufficiently detailed that a member of the public or reviewing agencies would know that the project had changed and that the Second Negative Declaration was, in fact, a second Negative Declaration, and that it resulted from significant changes in the project. The City's CEQA process was thus both confusing and lacked transparency.

### **I.a The Original Project Description**

On December 19, 2019, the Planning Commission considered a version of the proposed Vacation Rental Ordinance<sup>2</sup> which included the following restrictions:

- (i) Citywide, the total number of active Vacation Rental permits shall not exceed 3,625; and
- (ii) Permitted Vacation Rental units shall account for less than 0.25% of the total number of housing units within any Census Tract in the City; and
- (iii) No Vacation Rental unit may be operated for more than 30 days per calendar year.

In addition, the draft ordinance included the following restrictions to limit the concentration and proximity of vacation rental units:

- (i) Buildings with up to four units (Type 1):
  - a. A maximum of one unit in any Type 1 building may be used for Vacation Rental purposes.
  - b. There must be at least 250 feet of separation between the property for which the Vacation Rental permit is being applied for and the property of other Type 1 Buildings with active Vacation Rental permits. The separation between Type 1 buildings shall be the horizontal distance measured in a straight line, without regard to intervening structures, from the property line of each Type 1 building.
- (ii) Buildings with more than four units (Type 2):
  - a. A maximum of 5% of units in an individual Type 2 building, or 10 units in total, whichever is less, may be used for Vacation Rental purposes. If calculation of the number of units that can be used for Vacation Rental purposes

---

<sup>2</sup> For a copy of the ordinance considered by the Planning Commission on December 19, 2019 see: <https://planning.lacity.org/odocument/93d9f07c-c1b4-40dc-be51-137cf9916cee/CPC-2019-7045.pdf>

results in a number that is less than one, one Vacation Rental permit may be obtained in the building.

**I.b The Planning Commission Acted on the Negative Declaration for the Original Project Before it was Circulated for Public Review and Comment and Falsely Stated It Had Considered Comments Received On the Negative Declaration**

Despite the fact that no Negative Declaration for the project had been circulated for public review, the Planning Commission took the following actions regarding the proposed project at its December 19, 2019 meeting<sup>3</sup> which took place at 8:30 a.m.<sup>4</sup>:

At its meeting of December 19, 2019, the Los Angeles City Planning Commission took the actions below in conjunction with its recommended approval of the following:

1. **Approved and Recommended** that the City Council determine, pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Negative Declaration, No. ENV-2019-7046-ND, and all comments received, there is no substantial evidence that the project will have a significant effect on the environment; find the Negative Declaration reflects the independent judgement and analysis of the City; adopt the Negative Declaration; and determine, based on the whole of the administrative record, that the Project is exempt from CEQA pursuant to CEQA Guidelines, Section 15301 (Class 1), and there is no substantial evidence demonstrating that an exception to a Categorical Exemption pursuant to CEQA Guidelines, Section 15300.2 applies;
2. **Approved and Recommended**, that the City Council adopt the proposed ordinance as modified by the City Planning Commission, as follows:
  - Increase the citywide cap from 3,625 (the equivalent of 0.25 percent of the current housing supply) to the equivalent of 1 percent.
  - Change the geographic unit subject to concentration caps from Census tracts to community plan areas, and increase the cap from 0.25 percent to 1 percent.

---

<sup>3</sup> The Letter of Determination is available at: <https://planning.lacity.org/pdiscaseinfo/document/MjM2MDgw0/46e6f77e-051c-4e11-ad6d-6ce8558211cd/pdd>

<sup>4</sup> See meeting agenda available at: <https://planning.lacity.org/dcpapi/meetings/document/65670>

- Increase the maximum number of days per calendar year a Vacation Rental may be rented from 30 to 90 days.
  - Specify that the required 250 feet of separation between Vacation Rental units in Type 1 buildings be per block face.
3. Instructed City Planning to study and report to the Planning and Land Use Management (PLUM) Committee on the following:
- Feasibility of requiring documentation showing Vacation Rentals are second homes, not investment properties.
  - Feasibility of limiting Vacation Rental ownership eligibility to individuals and individual trusts, not limited liability corporations.
  - Feasibility of allocating a significant portion of the Transient Occupancy Tax (TOT) and/or fees collected from Vacation Rentals to support affordable housing, permanent supportive housing, and/or housing for the homeless.
  - Additional information regarding the economic tipping point between a long-term and short-term rental within the construct of other regulatory limitations of the ordinance.

3) Adopted the staff report as the Commission’s report on the subject; and

4) Adopted the Findings.

Given that, as stated in the Letter of Determination<sup>5</sup>, as shown in the Noticing materials for the December 19, 2019 Negative Declaration included in **Attachment A**, and as stated in the Planning Commission’s finding itself, which is quoted below, that the Negative Declaration was circulated for a 30-day public review period beginning on December 19, 2019, the same day as the Planning Commission met and took action, the following Planning Commission finding included in the Letter of Determination that there was no substantial evidence that the ordinance would have a negative effect on the environment was premature, inappropriate and not supported by substantial evidence:

The Negative Declaration was published in the Los Angeles Times on December 19, 2019, opening a 30 day period to receive

---

<sup>5</sup> The Letter of Determination is available at:  
<https://planning.lacity.org/pdiscaseinfo/document/MjM2MDgw0/46e6f77e-051c-4e11-ad6d-6ce8558211cd/pdd>

comments. It reflects the lead agency's independent judgment and analysis. On the basis of the whole of the record before the lead agency, including any comments received, the lead agency finds that there is no substantial evidence that the proposed ordinance will have a negative effect on the environment. (sic).<sup>6</sup>

Not only did the Planning Commission make findings about the adequacy of the Negative Declaration, before it has been subject to public review and comment, it did so after recommending significant alterations to the proposed project which included a quadrupling of the allowable number of vacation rental units in the City and after altering protections in the original version of the ordinance aimed at protecting neighborhoods from an excessive concentration of vacation rental units. The Planning Commission thus acted in a manner contrary to the requirements of CEQA Guideline Section 15074.

**I.c The Notice For The First Negative Declaration (12/19/19) Lacked Important Information About the Project Description**

The City's published Notice of the Availability of the first Negative Declaration contained the following description of the project; see also **Attachment A**:

An ordinance establishing regulations to permit use of non-primary residences to be used for short-term rentals as Vacation Rental units. Proposed ordinance **includes several limitations on number of Vacation Rentals that will be permitted to operate in the City, including caps on number of permits available citywide & in each census tract**, allowing any individual or entity to obtain only 1 Vacation Rental permit, & allowing only owners of a dwelling unit to be eligible to obtain a Vacation Rental permit. Additionally, proposed ordinance prohibits units subject to Rent Stabilization Ordinance (RSO), units subject to affordable housing covenants or otherwise income restricted, Accessory Dwelling Units, & buildings that have been removed from rental market through Ellis Act within the past 7 years from being used for Vacation Rentals. **Furthermore, proposed ordinance establishes distancing requirements between Vacation Rentals**, limits number of Vacation Rentals that may be allowed in any individual

---

<sup>6</sup> Exhibit B Letter of Determination available at:

<https://planning.lacity.org/pdiscaseinfo/document/MjM2MDgw0/46e6f77e-051c-4e11-ad6d-6ce8558211cd/pdd>

See also Planning Department Recommendation Report available at:

<https://planning.lacity.org/odocument/93d9f07c-c1b4-40dc-be51-137cf9916cee/CPC-2019-7045.pdf>

Supplemental Meeting Documents available at:

<https://planning.lacity.org/dcpapi/meetings/document/addtldoc/57260>

Meeting Minutes available at: <https://planning.lacity.org/dcpapi/meetings/document/68252>

Audio of the Planning Commission meeting available at:

<https://planning.lacity.org/dcpapi/meetings/document/65771>

Council File available at:

<https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=cfi.viewrecord&cfnumber=18-1246>

building, & establishes a maximum number of days that a dwelling unit may be rented as a Vacation Rental in a calendar year. Proposed ordinance establishes a process for Vacation Rental permit application, renewal, suspension & revocation, establishes standards & requirements for both owners of Vacation Rental units & hosting platforms, directs a portion of Transient Occupancy Taxes and/or per-night fees derived from Vacation Rentals to Short-Term Rental Enforcement Trust Fund, & establishes fees & fines. Collectively, this is referred to as City’s proposed Vacation Rental Ordinance Project (“Project”). (Emphasis added).

The project description in the notice thus failed to disclose the actual maximum number of rental units allowed, maximum days per year rentals would be permitted, and spacing requirements included to protect against a concentration of rental units within specific neighborhood, all of which were changed by Planning Commission action. Without that information in the Notice, members of the public and reviewing agencies would have no way of distinguishing between the two Negative Declarations, as discussed more fully under I.f.

#### **I.d The First Negative Declaration**

The first Negative Declaration was circulated for public review from December 19, 2019 to January 21, 2020. The first Negative Declaration fails to provide any quantitative information about the location or number of vacation rental units existing in the City currently. It does acknowledge that:<sup>7</sup>

Though Vacation Rental activity in the City of Los Angeles is prohibited by the City’s Zoning Code, the City had not actively enforced the City’s prohibition of Vacation Rentals due to limited resources until very recently. In December of 2018, the Los Angeles City Council adopted the Home-Sharing Ordinance, which established a legal process whereby residents may be authorized to rent their primary residence to short-term visitors. As such, the Home-Sharing Ordinance continued to prohibit Vacation Rentals as defined by the Proposed Project. **As an ordinance that regulates a portion of the short-term rental market, the Home-Sharing ordinance is a related project to the proposed Vacation Rental Ordinance, and its effect on the presence of short-term rentals in the City must be analyzed when discussing existing conditions.** (Emphasis added).

---

<sup>7</sup> Page 9-10 of the First Negative Declaration available at: [https://files.ceqanet.opr.ca.gov/258075-2/attachment/N0rPcmu-l0wRwt8NTBqwE5hq-9OQemharj\\_jHvG9yWPjTZH1n1kCyVH1t1WsRVtns4l4OpV9X73hdcMs0](https://files.ceqanet.opr.ca.gov/258075-2/attachment/N0rPcmu-l0wRwt8NTBqwE5hq-9OQemharj_jHvG9yWPjTZH1n1kCyVH1t1WsRVtns4l4OpV9X73hdcMs0)

However, the First Negative Declaration fails provide any such analysis, at least in any meaningful way, or to provide the requisite cumulative impact analysis. The same is true of the Second Negative Declaration.

The First Negative Declarations also fails to provide information on the number of units being rented to visitors before or after adoption of the Home-Sharing Ordinance<sup>8</sup> which allows for rental of a primary residence, or at the time the First Negative Declaration was prepared. In addition, it fails to provide information on the location and magnitude of existing visitor use of either first or second homes, or the geographic location and magnitude of concentration of such activity, or to document the type and magnitude of problems associated with such activity. Instead the Negative Declaration provides only the most general of qualitative information, while acknowledging that there is a geographic concentration of Home-Sharing activity, stating:

. . . data provided to City Planning prior to the enforcement of the Home Sharing Ordinance showed that, while short-term rental activity existed all over the city, it was most prevalent in a select number of neighborhoods that serve as the largest destinations for tourists to the City. According to data provided to the Department by Host Compliance, AirBnB, VRBO, and Keep Neighborhoods First, the neighborhoods with the highest concentrations of short-term rentals include Venice, **Hollywood**, Silver Lake, Echo Park, and Downtown Los Angeles. Thus, it can be reasonably assumed that there is an existing baseline level of activity, and this activity is disproportionately concentrated in a few neighborhoods in the City.<sup>9</sup> (Emphasis added).

The First Negative Declaration also states:

The intention of this Project is to allow some Vacation Rentals to legally operate, while eliminating those that contribute to issues that are commonly associated with short-term rentals- namely, **reducing available long-term housing supply, changing the residential character of neighborhoods, and nuisance related issues**. The proposed ordinance contains several provisions that establish limitations on the amount of and location where Vacation Rentals can operate, operational standards Vacation Rentals must comply with, and associated penalties for both owners of units and

---

<sup>8</sup> The City's Home-Sharing Ordinance is available at:

<https://planning.lacity.org/ordinances/docs/homesharing/adopted/Final%20Ordinance.pdf>

The ordinance allows for: "An accessory use of a Host's Primary Residence for a maximum of 120 days in a calendar year for the purpose of providing Short-Term Rental in compliance with the registration and other requirements of Los Angeles Municipal Code Section 12.22 A 32." A copy of the City's Home-Sharing Administrative Guidelines is available at: [https://planning.lacity.org/odocument/bf5980e9-2505-4046-9d7f-855899a99612/HSO\\_Admin\\_Guidelines.pdf](https://planning.lacity.org/odocument/bf5980e9-2505-4046-9d7f-855899a99612/HSO_Admin_Guidelines.pdf)

<sup>9</sup> Page 10 of the First Negative Declaration available at: [https://files.ceqanet.opr.ca.gov/258075-2/attachment/N0rPcmu-l0wRwt8NTBqwE5hq-90Qemharj\\_jHvG9yWPjTZH1n1kCyVH1t1WsRVtns4l4OpV9X73hdcMs0](https://files.ceqanet.opr.ca.gov/258075-2/attachment/N0rPcmu-l0wRwt8NTBqwE5hq-90Qemharj_jHvG9yWPjTZH1n1kCyVH1t1WsRVtns4l4OpV9X73hdcMs0)

hosting platforms for violating the provisions of the ordinance. **Cumulatively**, these provisions serve to **limit the impact** Vacation Rentals will have on existing neighborhoods and the environment. While it is expected that the presence of Vacation Rentals **will grow** beyond the limited presumed current baseline, the overall number of units that will be allowed to be used as Vacation Rentals will not exceed 3,625, which is approximately equal to 0.25% of the City's total current housing stock. Furthermore, the Project does not authorize any new development. Given the relatively small number of Vacation Rentals that will be permitted to operate within the entire City, the caps on the number allowed in each Census tract, and the other limitations and prohibitions contained in the Project, it is reasonably anticipated that no significant environmental impacts will be associated with this Project. (Emphasis added).

The First Negative Declaration thus acknowledges the potential for impacts, but fails to provide substantial evidence to support the belief that the provisions of the proposed Ordinance are sufficient to ensure that impacts will not be significant. In addition, the First Negative Declaration assumes that enforcement actions by the City will ensure that impacts will be limited. This is problematic for three reasons: (1) the First Negative Declaration has provided no substantial evidence that the City is actually engaging in enforcement of the Home-Sharing Ordinance – in fact, as detailed in this letter, the City has recently acknowledged its lack of such enforcement (see **Attachment E**) and the Negative Declaration itself acknowledges that “the City had not actively enforced the City’s prohibition of Vacation Rentals due to limited resources until very recently”; (2) no substantial evidence has been provided to demonstrate that the City will have resources for enforcement going forward; and (3) the threshold for enforcement provided for by both the first and second versions of the proposed project, would allow for impacts to occur, before enforcement actions are taken. Under the original version of the proposed project, if a Vacation Rental receives two citations for violating the provisions of the ordinance, the Vacation Rental permit will be suspended for 30 days, or as long as at least one citation is open, whichever is longer. If a Vacation Rental receives three citations, and the citations have been made final because they were not successfully appealed, the Vacation Rental permit will be revoked. If a Vacation Rental permit is revoked, the owner of the unit is prohibited from obtaining a Vacation Rental permit for one year from the effective date of the Notice of Intent to Revoke. The ordinance would thus allow for up to three impact incidences to occur before revoking the permit for a year and two incidences before any action whatsoever is taken. Clearly the potential for impacts remains.

#### **I.e The Revised Project**

As shown in **Table 1**, the changes in the proposed project made at the Planning Commission’s December 19, 2019 meeting substantially increase the project’s potential to result in environmental impacts from what would have occurred under the original version of the project, as a result in the increase in the number of allowable vacation

rentals, the number of potential days per year of rental use, and the potential for greater concentration of rental units:

<b>TABLE 1 COMPARISON OF FIRST AND SECOND VERSIONS OF THE PROJECT</b>		
	<b>First Version Project</b>	<b>Second Version Project</b>
Cap on Allowable Vacation Rental units City-wide	3,625	14,740
Allowable Vacation Rental units Hollywood Community Plan Area	Not disclosed	1,071
Allowable Rental Days Per Year	30	90
Maximum Total Rental Days per Year (units x days)	108,750	1,326,600
Maximum Total Rental Days per Year Hollywood Community Plan Area (units x days)		96,390
Maximum Units Limited by:	Census Tract	Community Plan Area
Proximity of Two Vacation Rentals Limited by:	Must be 250 feet away in any direction (i.e. 250-foot radius)	Must be 250 feet away from any rental on the same street frontage
Source: the First Negative Declaration and the Second Negative Declaration		

The revised project would thus allow almost the same number of Vacation Rental days per year, just within the Hollywood Community Plan area (96,390 days), as the original project would have allowed City-wide (108,750 days). City-wide, the revised project would allow more than a 12-fold increase in the number of Vacation Rental days. In addition, the revised project does little to protect against a concentration of Vacation Rental units within a Community Plan area. It is thus ridiculous to assume that the revised project would have the same lack of impacts as the first version of the proposed project, yet there was little to no change in the impact analysis, between the first and second Negative Declarations as documented in **Attachment B**, which is a comparison of the texts of the two Negative Declarations.

**I.f The Notice For The Second Negative Declaration (6/4/2020) Lacked Important Information About the Project Description**

**Table 2** compares the key language from the Notice for the First Negative Declaration with the language for the Second Negative Declaration:

<b>TABLE 2 COMPARISON OF PROJECT DESCRIPTION IN NOTICES FOR THE FIRST AND SECOND NEGATIVE DECLARATIONS</b>	
<b>Notice For First Negative Declaration</b>	<b>Notice For Second Negative Declaration</b>
<p>Proposed ordinance <b>includes several limitations on number of Vacation Rentals that will be permitted to operate in the City, including caps on number of permits available citywide &amp; in each <u>census tract</u></b>, allowing any individual or entity to obtain only 1 Vacation Rental permit, &amp; allowing only owners of a dwelling unit to be eligible to obtain a Vacation Rental permit. Additionally, proposed ordinance prohibits units subject to Rent Stabilization Ordinance (RSO), units subject to affordable housing covenants or otherwise income restricted, Accessory Dwelling Units, &amp; buildings that have been removed from rental market through Ellis Act within the past 7 years from being used for Vacation Rentals. <b>Furthermore, proposed ordinance establishes distancing requirements between Vacation Rentals</b>, limits number of Vacation Rentals that may be allowed in any individual building, <b>&amp; establishes a maximum number of days that a dwelling unit may be rented</b> as a Vacation Rental in a calendar year.</p>	<p>As discussed in more detail in Project Description, proposed ordinance <b>includes several limitations on number of Vacation Rentals that will be permitted to operate in the City, including caps on number of Vacation Rental permits available citywide &amp; in each <u>community plan area</u></b>, allowing an individual or entity to obtain only one Vacation Rental permit, &amp; allowing only owners of a dwelling unit to be eligible to obtain a Vacation Rental permit. Additionally, proposed ordinance prohibits units subject to the Rent Stabilization Ordinance (RSO), units subject to affordable housing covenants or otherwise income restricted, Accessory Dwelling Units, &amp; buildings that have been removed from rental market through Ellis Act within the past 7 years from being used for Vacation Rentals. <b>Furthermore, proposed ordinance establishes distancing requirements between Vacation Rentals</b>, limits number of Vacation Rentals that may be allowed in any individual building, <b>&amp; establishes a maximum number of days that a dwelling unit may be rented</b> as a Vacation Rental in a calendar year.</p>

As can be seen from this comparison, the only disclosure of a substantive change to the project, is the substitution of community plan area, for census tracts, something that might easily be missed by a reader. The Notice for the Second Negative Declaration failed to disclose that the City had prepared a Second Negative Declaration for the proposed project because the project had been changed in significant ways which had the potential to substantially increase project impacts, including a four-fold increase in the number of allowable units, a three-fold increase in the maximum number of rental days per year per unit, and that rather than restricting concentration based on a 250 foot radius, under the revised project, the restriction was changed to a 250 foot street frontage. These disclosure failures thus deprived the public and responsible agencies of important information which would have allowed them to determine whether or not they wanted to comment on the Second Negative Declaration.

**I.g The Second Negative Declaration**

Despite significant change to the project description, no substantive change to the environmental analysis included in the Second Negative Declaration,<sup>10</sup> from that included

<sup>10</sup> The second Negative Declaration is available at: <https://planning.lacity.org/odocument/a80492a4-a926-4f80-9967-958d7253b197/ENV-2019-7046.pdf>

in the First Negative Declaration,<sup>11</sup> was made, as shown in the comparison of the two documents contained in **Attachment B**, despite the significant increase in allowable vacation units and days of use, as detailed in **Table 1**, and the clear potential for this to result in impacts. (See **Sections I, II, III and IV** of this letter).

**I.h The Second Negative Declaration Has Not Been Reviewed or Considered By the Planning Commission**

Neither the First or Second Negative Declaration has actually been reviewed or considered by the Planning Commission, despite the fact that a Letter of Determination was issued for the proposed project on October 27, 2020.<sup>12</sup>

**II. A CLASS 1 CATEGORICALLY EXEMPTION CAN NOT BE USED FOR THE PROPOSED PROJECT**

The proposed project is not eligible for a Class 1 Categorical Exemption. It does not fall into the class of projects covered by a Class 1 exemption, and it has the potential to result in both significant impacts due to unusual circumstances and cumulative impacts.

**II.a The Project Doesn't Fall Into the Categories of Projects Eligible for a Class 1 Exemption**

CEQA Guidelines Section 15301 describes the types of projects eligible for a Class 1 Exemption as follows (emphasis added):

**15301. EXISTING FACILITIES**

Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, **involving negligible or no expansion of existing or former use**. The types of “existing facilities” itemized below are not intended to be all-inclusive of the types of projects which might fall within Class 1. The key consideration is whether the project involves negligible or no expansion of use.

Examples include but are not limited to:

- (a) Interior or exterior alterations involving such things as interior partitions, plumbing, and electrical conveyances;

---

<sup>11</sup> The first Negative Declaration is available at: [https://files.ceqanet.opr.ca.gov/258075-2/attachment/N0rPcmu-l0wRwt8NTBqwE5hq-9OQemharj\\_jHvG9yWPjTZH1n1kCyVH1t1WsRVtns4l4OpV9X73hdcMs0](https://files.ceqanet.opr.ca.gov/258075-2/attachment/N0rPcmu-l0wRwt8NTBqwE5hq-9OQemharj_jHvG9yWPjTZH1n1kCyVH1t1WsRVtns4l4OpV9X73hdcMs0)

<sup>12</sup> The Letter of Determination is available at: <https://planning.lacity.org/pdiscaseinfo/document/MjM2MDgw0/46e6f77e-051c-4e11-ad6d-6ce8558211cd/pdd>

- (b) Existing facilities of both investor and publicly owned utilities used to provide electric power, natural gas, sewerage, or other public utility services;
- (c) Existing highways and streets, sidewalks, gutters, bicycle and pedestrian trails, and similar facilities (this includes road grading for the purpose of public safety), and other alterations such as the addition of bicycle facilities, including but not limited to bicycle parking, bicycle-share facilities and bicycle lanes, transit improvements such as bus lanes, pedestrian crossings, street trees, and other similar alterations that do not create additional automobile lanes);
- (d) Restoration or rehabilitation of deteriorated or damaged structures, facilities, or mechanical equipment to meet current standards of public health and safety, unless it is determined that the damage was substantial and resulted from an environmental hazard such as earthquake, landslide, or flood;
- (e) Additions to existing structures provided that the addition will not result in an increase of more than:
  - (1) 50 percent of the floor area of the structures before the addition, or 2,500 square feet, whichever is less; or
  - (2) 10,000 square feet if:
    - (A) The project is in an area where all public services and facilities are available to allow for maximum development permissible in the General Plan and
    - (B) The area in which the project is located is not environmentally sensitive.
- (f) Addition of safety or health protection devices for use during construction of or in conjunction with existing structures, facilities, or mechanical equipment, or topographical features including navigational devices;
- (g) New copy on existing on and off-premise signs;
- (h) Maintenance of existing landscaping, native growth, and water supply reservoirs (excluding the use of pesticides, as defined in Section 12753, Division 7, Chapter 2, Food and Agricultural Code);
- (i) Maintenance of fish screens, fish ladders, wildlife habitat areas, artificial wildlife waterway devices, streamflows, springs and waterholes, and stream channels (clearing of debris) to protect fish and wildlife resources;
- (j) Fish stocking by the California Department of Fish and Game;
- (k) Division of existing multiple family or single-family residences into common-interest ownership and subdivision

- of existing commercial or industrial buildings, where no physical changes occur which are not otherwise exempt;
- (l) Demolition and removal of individual small structures listed in this subdivision:
    - (1) One single-family residence. In urbanized areas, up to three single-family residences may be demolished under this exemption.
    - (2) A duplex or similar multifamily residential structure. In urbanized areas, this exemption applies to duplexes and similar structures where not more than six dwelling units will be demolished.
    - (3) A store, motel, office, restaurant, or similar small commercial structure if designed for an occupant load of 30 persons or less. In urbanized areas, the exemption also applies to the demolition of up to three such commercial buildings on sites zoned for such use.
    - (4) Accessory (appurtenant) structures including garages, carports, patios, swimming pools, and fences.
  - (m) Minor repairs and alterations to existing dams and appurtenant structures under the supervision of the Department of Water Resources.
  - (n) Conversion of a single family residence to office use.
  - (o) Installation, in an existing facility occupied by a medical waste generator, of a steam sterilization unit for the treatment of medical waste generated by that facility provided that the unit is installed and operated in accordance with the Medical Waste Management Act (Section 117600, et seq., of the Health and Safety Code) and accepts no offsite waste.
  - (p) Use of a single-family residence as a small family day care home, as defined in Section 1596.78 of the Health and Safety Code.

### **Project Would Result in Expansion of Existing or Former Use**

The proposed project is a City-wide Ordinance that affects more than one or two dwelling units and which cannot be shown to involve negligible or no expansion of existing or former use, particularly given that the existing or former uses are largely vacant second homes that would be used as Vacation Rentals under the proposed project. The proposed project therefore is not eligible for a Class 1 exemption, something the City must have known, given the City's decision to also prepare a Negative Declaration for the project.

**Expansion in Number of Short-Term Rental Units** – Although neither of the two Negative Declarations provided any information on the number of existing in-home short-term rental units in the City, some of that information is contained in the Planning

Commission materials. According to Planning Commission Materials for the December 19, 2019 Planning Commission meeting, as of May of 2019:<sup>13</sup>

Short-term rentals in non-primary residences are currently prohibited in the City of Los Angeles. Though Transient Occupancy Residential Structures (TORS) and bed and breakfasts are both permitted, these have restrictive qualifying criteria and do not allow for individuals to engage in renting out secondary units on a short-term basis. However, despite being illegal, Vacation Rentals have operated in the City for years, **largely due to enforcement challenges**. Based on citywide data provided by Host Compliance, LLC, a short-term rental services company, in May 2019, there were approximately 37,196 active short-term rental listings in the City, of which 27,652 were “whole unit” listings. Using a formula that analyzed the economic tipping point between expected income from short-term as compared to long-term renting of whole units, **it was estimated that approximately 7,860 units were being used for Vacation Rentals (short-term rentals in non-primary residences) at the time the analysis was undertaken.**

. . . . According to the Department of City Planning’s Home-Sharing Unit, as of the beginning of December 2019, the total number of active short-term listings has fallen to approximately 15,000, representing a decline of roughly 40% from May 2019.

Vacation Rentals have been prohibited under the Zoning Code, and this prohibitions has been reinforced by the Home Sharing Ordinance, which allows short-term rentals only in primary residences. (sic)

This would mean, assuming the same proportion of primary to non-primary home rentals, that between zero and approximately 4,716 non-primary residences were illegally being used for Vacation Rentals in the City, as of December 2019, when the first of the two Negative Declarations and the Planning Commission’s action on the Categorical Exemption occurred. The Second Negative Declaration estimates the number slightly higher at 5,630.<sup>14</sup> Given that the revised project would allow for 14,740 Vacation Rentals in the City (see **Table 1** and the text of the revised project), the proposed project represents more than a negligible expansion in the use of vacant non-primary residences for

---

<sup>13</sup> See page 3-4 of the December 19, 2019 Planning Commission Hearing materials available at: For a copy of the ordinance considered by the Planning Commission on December 19, 2019 see: <https://planning.lacity.org/odocument/93d9f07c-c1b4-40dc-be51-137cf9916cee/CPC-2019-7045.pdf>

<sup>14</sup> See page 10 of the Second Negative Declaration, available at: <https://planning.lacity.org/odocument/a80492a4-a926-4f80-9967-958d7253b197/ENV-2019-7046.pdf>

Vacation Rental use. The proposed project is therefore not eligible for a Class 1 exemption.

**Growth-Inducing Effect** – The Planning Commission hearing materials also explain why the original version of the project only allowed for second homes to be operated 30 days a year as a Vacation Rental:<sup>15</sup>

Vacation Rentals may only be operated for a maximum of 30 nights per calendar year. While this provision of the proposed ordinance serves to limit the impact of transient occupation of residences in established neighborhoods, it also acts as a disincentive for individuals to purchase second homes for the express purpose of using them as Vacation Rentals. By limiting the number of nights a Vacation Rental may be listed to just 30 nights, it is intended that individuals looking to purchase secondary units to be used as Vacation Rentals will be dissuaded from doing so, and, as the units would be more profitable as long term housing, units will remain available for long-term residents in need of housing. According to research conducted by City Planning, and using data provided by Host Compliance, LLC, it is estimated that the tipping point of profitability between a short-term as compared to a long-term rental is approximately 70-85 days, so the booking limit of 30 nights in a calendar year helps ensure that the profitability of a Vacation Rental is well below that of a long-term rental.

The revised project addressed in the Second Negative Declaration would allow for second homes to be rented for up to 90 days a year as a Vacation Rental. Thus, based on the City's own analysis, the revised project has the potential to result in the purchase of second homes for the express purpose of using them as Vacation Rentals. This has the potential to result in a significant housing impact, through the loss of long-term housing units, which has not been addressed in any of the environmental documents for the proposed project. It may also encourage the construction of new homes for purposes of use as Vacation Rentals, and encourage the development of large "spec"<sup>16</sup> houses, since they could be rented as vacation homes, while a buyer is sought, thus encouraging increased production of party houses, with their associated impacts. Because it would

---

<sup>15</sup> See page 7 of the December 19, 2019 Planning Commission Hearing materials available at: For a copy of the ordinance considered by the Planning Commission on December 19, 2019 see: <https://planning.lacity.org/odocument/93d9f07c-c1b4-40dc-be51-137cf9916cee/CPC-2019-7045.pdf>

<sup>16</sup>What has happened in the DSPNA neighborhood is that very large houses were built on speculation (spec). These houses are investment vehicles and as such are almost necessarily second and third homes. When they are second/third/fourth homes that means that there is then an incentive to rent them out to create an additional income stream. What has also happened is that many of them remain unsold so that now the developers need to create an income stream since they are not selling, resulting in more short-term rentals. As a result, there are a large number of properties, specifically in the DSPNA neighborhood that are vacant and which owners would like to use for an income stream.

encourage an expansion of use, the proposed project is not eligible for a Class 1 exemption. Growth-Inducing impacts need to be addressed in an environmental document for the proposed project, as it is clear they are potentially significant.

**Proliferation of Party Houses** - As detailed more fully later in this letter, like the City's Home-Sharing Ordinance, the proposed project has the potential to result in a proliferation of party houses within the City. The Hollywood Hills is where party houses are concentrated, particularly the DSPNA, Laurel Canyon, and Mt. Olympus neighborhoods. LAPD Hollywood Station is a noted high performer in citing party houses. They have given 161 citations year-to-date. Any environmental document for the project needs to contain information on the number of party houses, and party house calls for service and citations by month and year, broken out by zip code, census tract and Community Plan Area. Hollywood hillside areas have seen a proliferation of the construction of large vacation or "spec" homes. Many of these are likely to be used as rentals under the proposed project. Given their size, they are likely to be occupied by more than one family group. Party houses are a substantial problem in hillside areas and the uses of largely vacant vacation homes as party houses, or even just by vacation groups, would represent more than a negligible expansion of existing or former use, particularly given that the project would allow for rental of 14,740 vacation homes City-wide<sup>17</sup> and 1,071 within the Hollywood Community Plan area.<sup>18</sup> The proposed project thus does not fall into one of the categories covered by a Class 1 exemption.

## **II.b Potential For Cumulative Impacts**

As discussed under **I.d**, above, the proposed project in combination with the City's Home-Sharing Ordinance, has the potential to result in cumulative impacts. This is acknowledged, but the potential for impacts is not addressed, in the Negative Declarations for the proposed project.<sup>19</sup> As shown in **Attachment G**, there are currently 76 approved Home-Sharing permits, 15 pending permits, 39 inactive permits and 68 denied permits within the DSPNA area (zip code 90069). The main reason for the denial of permits has been that the homes in question are not primary residences; thus, the 68 denied applications would likely be eligible for permits under the proposed project. In total, there are permits for 198 active, inactive, pending and denied (but likely eligible under the proposed project) short-term rentals on file for the DSPNA area. Given that there are approximately 2,000 homes in the approximately 1 square mile DSPNA area, past, present and reasonably foreseeable short-term rentals would represent approximately 10% of the housing stock in the DSPNA area, well above the 1% target of the revised project or the 0.25% target of the original project. This illustrates the fact that setting maximum concentration limits based on Community Plan areas, is inadequate to

---

<sup>17</sup> Page 14 of the Second Negative Declaration available at:

<https://planning.lacity.org/odocument/a80492a4-a926-4f80-9967-958d7253b197/ENV-2019-7046.pdf>

<sup>18</sup> Page 16 of the Second Negative Declaration available at:

<https://planning.lacity.org/odocument/a80492a4-a926-4f80-9967-958d7253b197/ENV-2019-7046.pdf>

<sup>19</sup> Page 9-10 of the First Negative Declaration available at: [https://files.ceqanet.opr.ca.gov/258075-2/attachment/N0rPcmu-10wRwt8NTBqwE5hq-9OQemharj\\_jHvG9yWPjTZH1n1kCyVH1t1WsRVtns4l4OpV9X73hdcMs0](https://files.ceqanet.opr.ca.gov/258075-2/attachment/N0rPcmu-10wRwt8NTBqwE5hq-9OQemharj_jHvG9yWPjTZH1n1kCyVH1t1WsRVtns4l4OpV9X73hdcMs0)

Also see page 10 of the Second Negative Declaration available at:

<https://planning.lacity.org/odocument/a80492a4-a926-4f80-9967-958d7253b197/ENV-2019-7046.pdf>

prevent an over-concentration of short-term units. Under the proposed project, the concentration of short-term rentals in the DSPNA area (zip code 90069) would represent a significant cumulative impact.

The environmental document for the proposed project needs to include an analysis and mapping of existing short-term rental distribution in the City, by Community Plan, census tracts and zip codes, to determine the appropriate geographic unit to use in the proposed Ordinance to protect against an overconcentration of units. The environmental document should also provide mitigation measures to ensure that short-term rentals do not exceed either the thresholds of significance or proposed project maximums in any given area, and those maximums should be for short-term rentals regardless of whether they are in primary or secondary homes. Such mitigation measures should include prohibiting the issuance of additional permits in areas which exceed the maximum number of short-term units and methods for reducing the number of short-term rental units in areas experiencing an overconcentration. In the absence of such mitigation measures, the proposed project would contribute to a significant cumulative impact.

The proposed project would allow for an additional 1,071 Vacation Rentals within the Hollywood Community Plan area, as well as additional units in the adjacent portions of the hillside area. Given the potential for cumulative impacts, the proposed project is not eligible for a Class 1 Exemption.

## **II.c Unusual Circumstances With the Potential To Result In Impacts**

There are a number of unusual circumstances that lead to the potential for the proposed project to result in significant impacts.

**Tendency for Concentration That Would Be Exacerbated By Proposed Project** - As acknowledged in the two Negative Declaration, there is a tendency of short-term rentals to be concentrated in areas of the City which are frequented by tourists:<sup>20</sup>

. . . data provided by Host Compliance, AirBnB, VRBO, and Keep Neighborhoods First all shows that short-term rental activity is most concentrated in a few neighborhoods. These neighborhoods include Venice, located within the Venice Community Plan, Silver Lake and Echo Park, located within the Silver Lake- Echo Park- Elysian Valley Community Plan, **Hollywood, located within the Hollywood Community Plan**, and Downtown, located within the Central City and Central City North Community Plans. (Emphasis added).

So, there is already an unequal distribution of short-term rental units across the City, be they primary residences or secondary homes being illegally rented. The Negative Declarations fail to provide information on the number of short-term rentals within each community plan area, or the distribution within community plans areas, so

---

<sup>20</sup> See for example, page 15 of the Second Negative Declaration.

any assumption that units are or would be evenly distributed within each community plan area is not supported by substantial evidence and is contrary to the evidence that is available.

The Hollywood Community Plan area covers 25 square miles.<sup>21</sup> Of this, approximately 30 percent is taken up by Griffith Park. As a result, the approximately 17.5 square mile developed portion of the Hollywood Community Plan area has a population density that exceeds 22,000 persons per square mile.<sup>22</sup> According to page 62 of the Draft Community Plan, the “Hollywood Community Plan Area represents the City’s second largest regional center and #1 tourist attraction, drawing over 25 million tourists annually.” Thus, the Hollywood Community Plan area is likely to have the highest demand for short-term rental units.

According to the Second Negative Declaration, the Hollywood Community Plan area has 107,095 dwelling units, more than any other Community Plan area, except the Wilshire Community Plan Area, with 130,636 dwelling units.<sup>23</sup> As a result the proposed project would allow for 1,070 Vacation Rentals within this Community Plan area, resulting the in second most of any Community Plan area. The Hollywood Community Plan’s draw as a tourist attraction coupled with the large number of housing units within the Plan area and thus the high number of Vacation Rentals that would be permitted under the proposed project, has the potential to result in a concentration of Vacation Rental Units in the most desirable portions of the Community Plan area. That represents an unusual circumstance. That coupled with the lack of any real mechanism to ensure an even distribution within the Community Plan area, has the potential to result in impacts. The tendency for Vacation Rentals and Home-Sharing units to be concentrated in certain parts of the City, and for the proposed project to further that concentration is an unusual circumstance with the potential to result in impacts.

**Party House Problem** – The demand for and problems associated with party houses in the Hollywood Hills represents an unusual circumstance. There is a tendency for larger rental homes to be used as party houses. This is particularly true in the Hollywood Hills. Party houses pose a potential for noise, traffic and police service impacts. For approximately the last six months, the DSPNA<sup>24</sup> has been tracking problems at homes used as Vacation Rentals, Home-Sharing and party houses in the DSPNA area west of Sunset Plaza Drive. About six months ago, DSPNA hired a dedicated patrol service at night, and those officers are directed to call the LAPD for any party. **Attachment D** contains information on party house reports from the patrol service (Officer Ruis), and direct reports from neighbors, documenting problems such as noise, traffic, gun and other violence, and other violations associated with party houses. Even though these reports represent an incomplete picture of the problem, they include

---

<sup>21</sup> See page 2-10 of the Hollywood Community Plan available at: <https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update#the-plan>

<sup>22</sup> See page 2-8 of the Hollywood Community Plan, available at: <https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update#the-plan>

<sup>23</sup> See Page 15-16 of the Second Negative Declaration.

<sup>24</sup> For information on the DSPNA see: <https://www.dspna.org>

violations at 87 different addresses from within this small area.<sup>25</sup> The existence of, number, and demand for party houses in hillside areas is an unusual circumstance. Given the large allocation of potential Vacation Rental permits that would occur as a result of the proposed project in the Hollywood Community Plan area, the propensity for party houses within the Hollywood Hills, and the lack of mechanisms to limit the distribution of Vacation Rental permits within the Community Plan area, there is the potential for the proposed project to result in impacts associated with the operation of party houses and Vacation Rentals.

**Lack of City Enforcement** – Both Negative Declarations acknowledge that the City has not enforced restrictions on Vacation Rentals and Home-Sharing until recently, and assume that enforcement improved once it was begun in November of 2019.<sup>26</sup> However, at least when it comes to the Hollywood Hills,<sup>27</sup> this is contradicted by City staff. Despite the documented problems in the DSPNA area (see **Attachment D**), as shown in **Attachment E**, when recently asked about enforcement activities, staff stated:

- In response to a request for information on suspended or revoked Home-Sharing Permits within the Hollywood Hills, staff stated: “LA City Planning's Home-Sharing has not suspended or revoked any registration.”
- Question: Has any listing site/platform been fined for non-conforming listings? Answer: “*No fines have been issued, we work with the platforms and mostly Hosts to remove non-compliant listings.*”
- Question: Would the ordinance allow for multiple \$1000/non-conforming listing fines per day? Answer: “*We have not gotten into multiple fines as we have not reached that stage.*”
- Question: Does anybody check whether the required language re: smoking, etc. is included in listings in high fire hazard severity zones? Answer: “*The Ordinance was written as to allow self certification for such compliance.*” (sic)
- Question: Does anybody check whether required notices are posted on-site? Answer: *The Ordinance was written as to allow self certification for such compliance.*” (sic)

The lack of enforcement is exacerbated by the fact that, as has been seen in the case of Home-Sharing short-term rentals, hosts who were denied permits or who would be ineligible for permits are listing their properties on other short-term rental sites, such as luxuryhomerentals.com and VRBO, with whom the City does not have agreements. **Attachment F** includes a listing of homes within the DSPNA area listed on luxuryhomerentals.com. Highlighted listing are where known calls for policing services

---

<sup>25</sup> The DSPNA area is largely comprised of the portion of zip code 90069 which is north of Sunset Boulevard. It is a little over one square mile in area. The City of Los Angeles is approximately 503 square miles in size. Although the DSPNA represents approximately 1/500<sup>th</sup> of the City, the DSPNA has experienced problems with 87 different party houses within the last year or so as documented in **Attachment D**.

<sup>26</sup> See for example, page 10 of the Second Negative Declaration.

<sup>27</sup> Zip Codes: 90046,90069, 90077 and 90210.

for parties have occurred. As can be seen from the spreadsheet, there have been problems with a large portion of the listings on this site.

The City's lack of enforcement, presence of home-share sites that are not monitored by the City, and allowing permittees to self-certify for compliance are all unusual circumstances with the potential to result in impacts. Given that some of the provisions in the ordinance are intended to avoid or mitigate impacts, as discussed below, allowing for self-certification would appear to violate CEQA requirements that a Lead Agency engage in mitigation monitoring and reporting.<sup>28</sup>

**The Proposed Ordinance Allows for Violations** – As previously noted, the proposed project, as well as the Home-Sharing Ordinance, include provisions that would allow for multiple violations of provisions aimed at reducing environmental impacts, by, in the case of the proposed project, providing:

(d) **Suspension and Revocation.** Notwithstanding any other provision of this Code to the contrary, the Director may require the suspension, modification, discontinuance or revocation of any Vacation Rental permit if it is found that the Permittee has violated this Subdivision or any other city, state, or federal regulation, ordinance or statute.

(1) **Suspension.** If a Permittee receives **two Citations**, as the term is defined in Section 12.22 A.32 the Vacation Rental permit shall be **suspended for 30 days** or as long as at least one Citation is open, whichever is longer.

(2) **Revocation.** If **three Citations** have been issued to the Permittee and have been made final either because they were not appealed during the appeal period, or the appeals were denied, the Permittee's Vacation Rental permit shall be revoked.

The provisions aimed at reducing environmental impacts such as noise, traffic, emergency access and fire hazards, that could be violated multiple times under the proposed project include:

(g) **Prohibitions and Requirements**

(4) A Permittee may not rent all or a portion of his or her Vacation Rental to more than one group of guests or under more than one booking, at any given time.

(5) Except for allowable Home Occupations, nonresidential uses including, but not limited to, sales or exchange of products, events

---

<sup>28</sup> See CEQA Guidelines Section 15097.

that charge a fee, or the promotion, display or servicing of any product shall not be permitted in the Vacation Rental.

(6) A Permittee shall only advertise on a Hosting Platform that was listed on the Permittee's Vacation Rental permit application form, unless the Permittee has submitted a written request and received written approval from the Department of City Planning to use another Hosting Platform.

(7) No more than two overnight guests are allowed per habitable room (not including kitchens) in a Vacation Rental.

(8) There shall be no use of sound amplifying equipment, as that term is defined in Section 111.01 (j) of this Code after 10:00 pm and no evening outdoor congregations of more than eight people (excluding children) in a Vacation Rental. Vacation Rental activities are subject to the noise regulations in the Los Angeles Municipal Code.

**(f) Vacation Rental Permittee Requirements.**

(1) The Permittee shall be responsible for any nuisance violations, as described in Section 12.27.1.B of this Code, arising at the Permittee's Vacation Rental unit. The Permittee shall be assessed a minimum inspection fee, as specified in Section 98.0412 of this Code for each site inspection.

(6) The Permittee who lists a Vacation Rental unit located in a Very High Fire Hazard Severity Zone designated by the City of Los Angeles Fire Department pursuant to Government Code Section 51178 shall include in all Vacation Rental listings and post written notices on any patio or deck that smoking is not permitted in any exterior of the property.

(7) The Permittee who lists a Vacation Rental unit located in a Red Flag No Parking Zone, as defined in Section 80.72 of this Code, shall post written notice in the unit alerting guests of Red Flag parking restrictions, and requiring compliance when such restrictions are activated. The Permittee, or a designated responsible agent of the Permittee, is also required to notify guests when Red Flag No Parking restrictions have been activated.

(8) The Permittee shall provide a code of conduct to guests that includes the relevant provisions of this Subdivision and other information to address behavioral, safety, and security issues.

The fact that the proposed project includes what are essentially mitigation measures, that the City allows for self-certification of compliance with such measures, and that the City expressly allows multiple violations of measures aimed at reducing impacts, are unusual circumstances which will allow impacts to occur.

### **Unique Characteristics of Portions of the City**

There are key portions of the City, where impacts associated with Vacation Rentals are likely to be greater. These include hillside areas which often have substandard streets, or windy streets and limited access, or poor roadway quality, or are located in High Fire Severity Zones, or are within the Santa Monica Mountains Zone, or include wildlife corridors and habitat blocks. All of these unusual circumstances have the potential to contribute to potentially significant project impacts. The potential of some of these unusual circumstances to contribute to significant project impacts is discussed more fully in **Section III**. However, all of these unusual circumstances should be addressed in an EIR for the proposed project.

**Substandard (Narrow) Streets** – Parking on substandard streets, and the presence of substandard streets in hillside areas, presents hazards and emergency access issues, regardless of whether or not the substandard streets are designated Red Flag streets. The environmental document for the proposed project needs to address these issues and to include an updated and more complete map than the examples provided in **Figure 1A, Figure 1B, and Figure 1C** showing the location of substandard streets. As shown on the figures, which are based on incomplete publicly available information, there are a number of streets in the hillside areas of the Hollywood Community Plan area that do not meet Local Street standards, and in some cases do not even meet Access Roadway standards.<sup>29</sup> This has emergency access implications, particularly given that many of these substandard hillside streets are located in High Fire Severity Zones. This is an unusual circumstance with the potential for impacts, given that the proposed project will introduce vacation renters into the area who are not familiar with parking restrictions or the geography of the area.

---

<sup>29</sup> See page 19 of the 2035 Mobility Element for roadway standards. A Hillside Collector is defined as having a 50-foot right-of-way and a 40-foot roadway. A Hillside Local is defined as having a 44-foot right-of-way and a 36-foot roadway. A Hillside Limited Standard is defined as having a 36-foot right-of-way and a 28-foot roadway. An Access Roadway is defined as having 20-foot roadway.



FIGURE 1A: Roadway Widths in Hillside Areas West of US-101  
Source: Arcgis

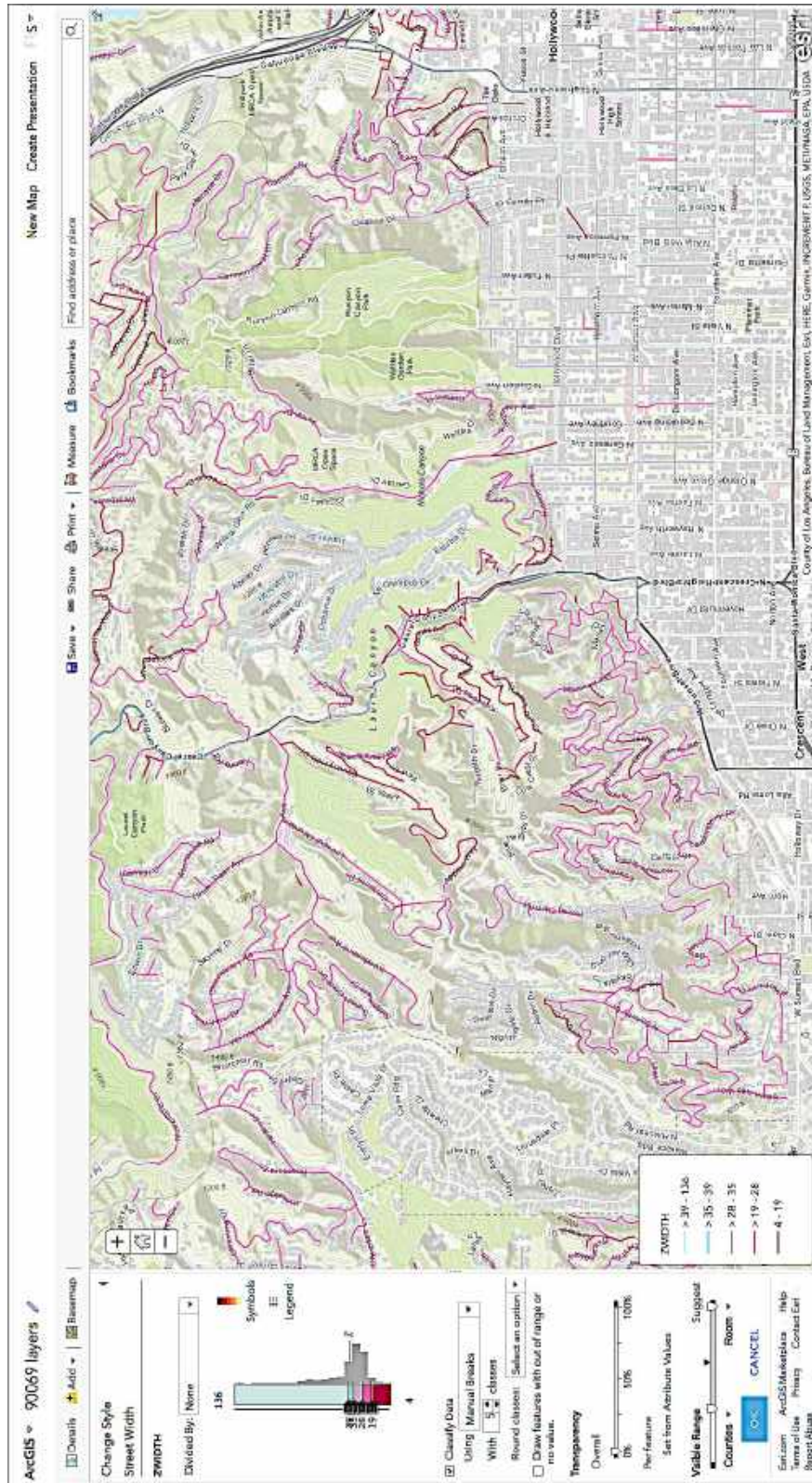


FIGURE 1B: Roadway Widths in Hillside Areas West of US-101  
Source: Arcgis

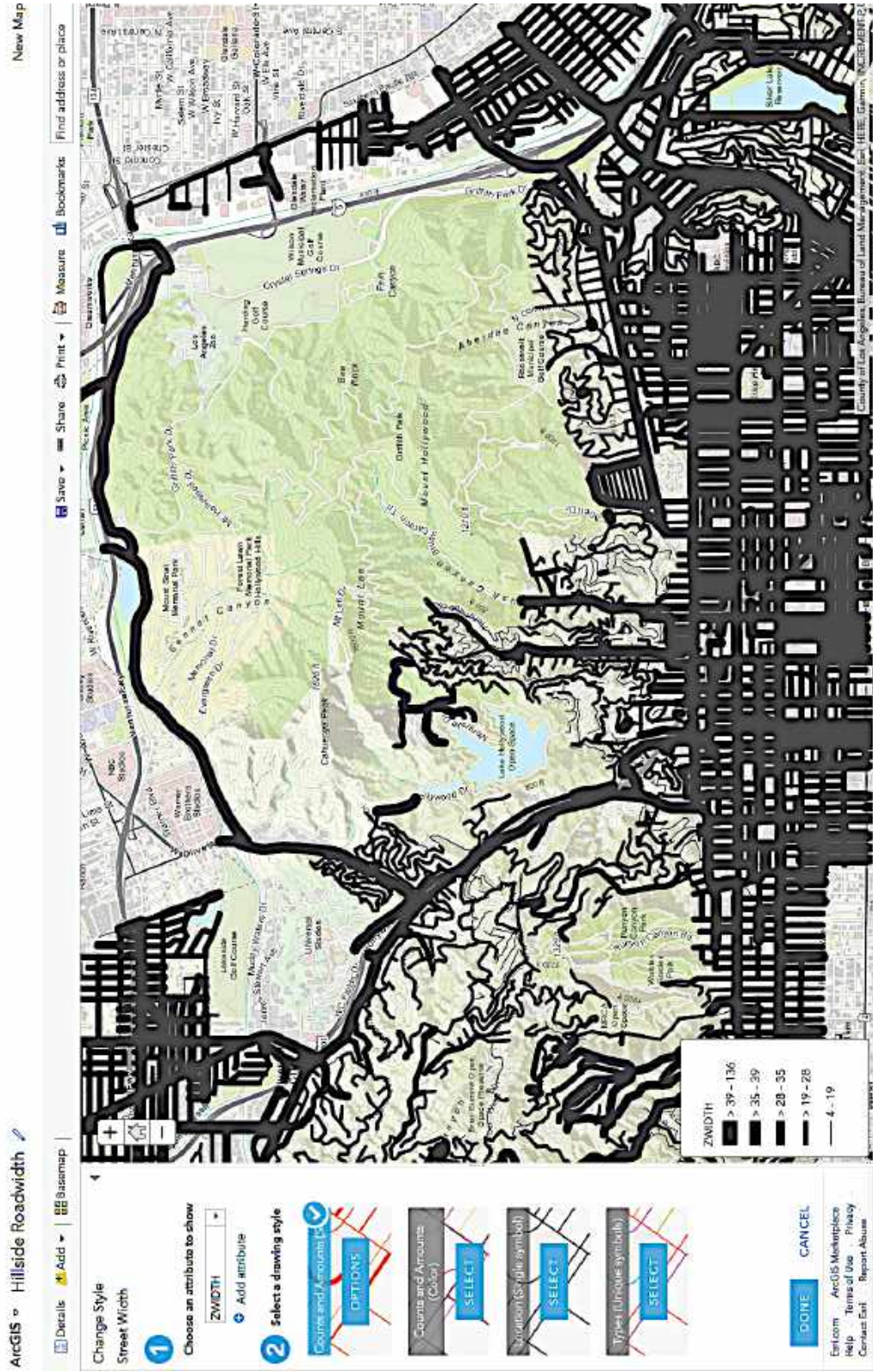


FIGURE 1C: Roadway Widths in Hillside Areas West of US-101  
Source: Arcgis

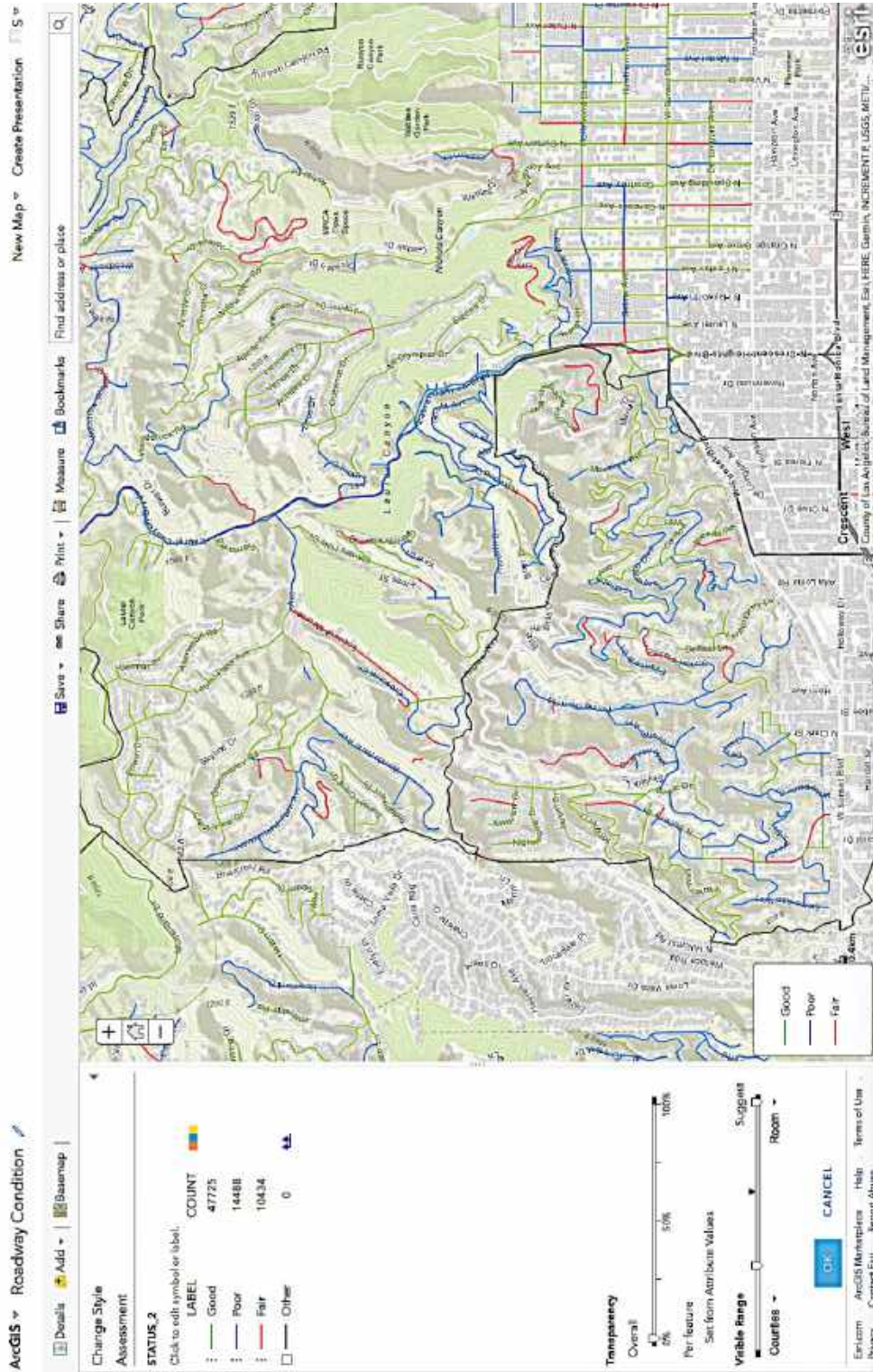
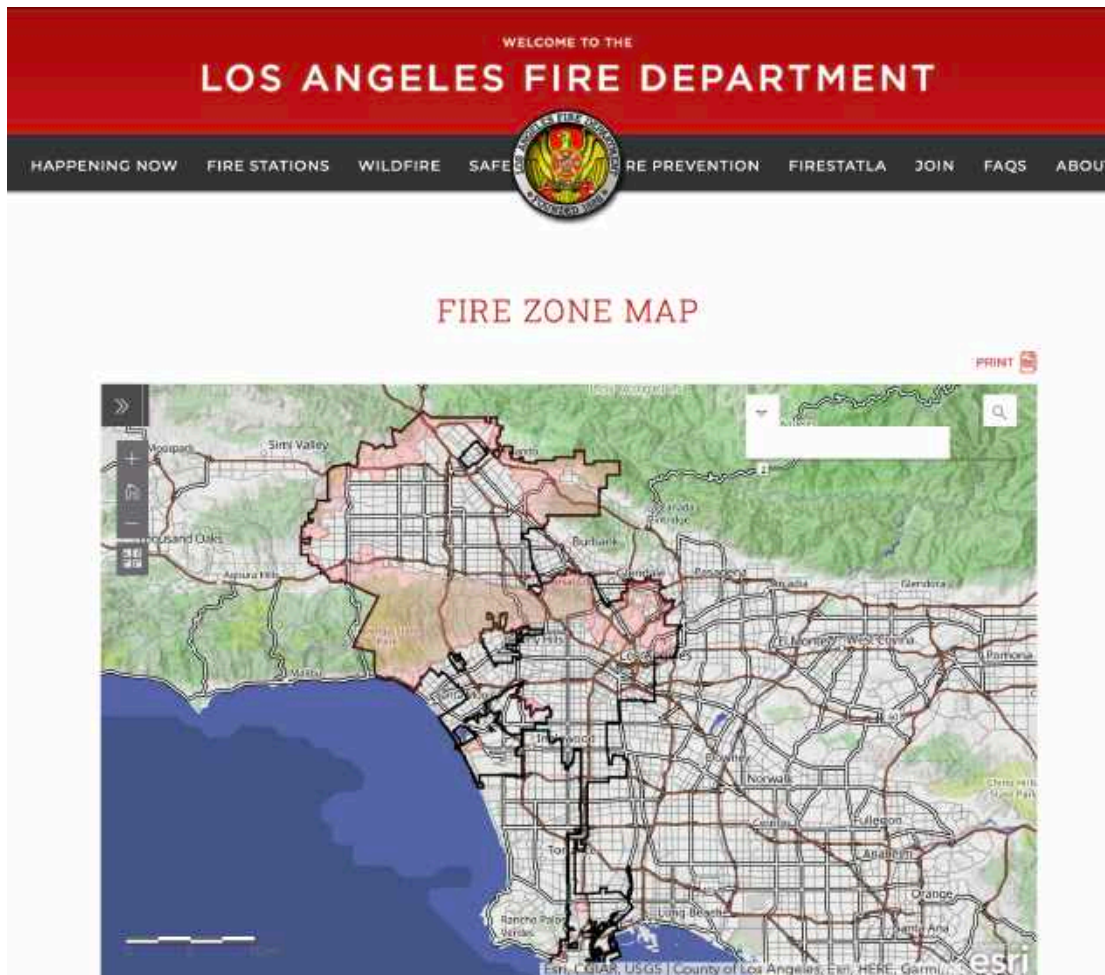


FIGURE 2A: Roadway Condition in Areas West of US-101  
Source: Arcgis

**Poor Roadway Quality** - Many of the substandard streets in the hillside areas are in poor conditions. This is an unusual circumstance with the potential to result in impacts. There is the potential for hazard impacts associated with increased visitor use and its effect on emergency access, and infrastructure failure-related hazards resulting from increased traffic and future construction activity that may result from the growth-inducing impacts of the proposed project. This needs to be addressed in the EIR for the proposed project. **Figure 2A and Figure 2B** provide publicly available information regarding current roadway conditions in hillside areas west of US-101 and US-5. The EIR for the proposed project needs to include updated information on roadway conditions.

**High Fire Severity Zones** – **Figure 3** show the location of High Fire Severity Zones within the City of Los Angeles. Location within a High Fire Severity Zone is an unusual circumstance. Party house uses in High Fire Severity Zones have the potential to result in fire-related impacts, since short-term vacation renters may be less likely to observe no-smoking signage and restrictions.



**FIGURE 3 – High Fire Severity Zones (in red)**

Source: <https://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map>

**Red Flag Streets** – **Figure 4** is a map showing the location of red flag parking restriction streets in the Hollywood Hills. As explained by the Los Angeles Fire Department:<sup>30</sup>

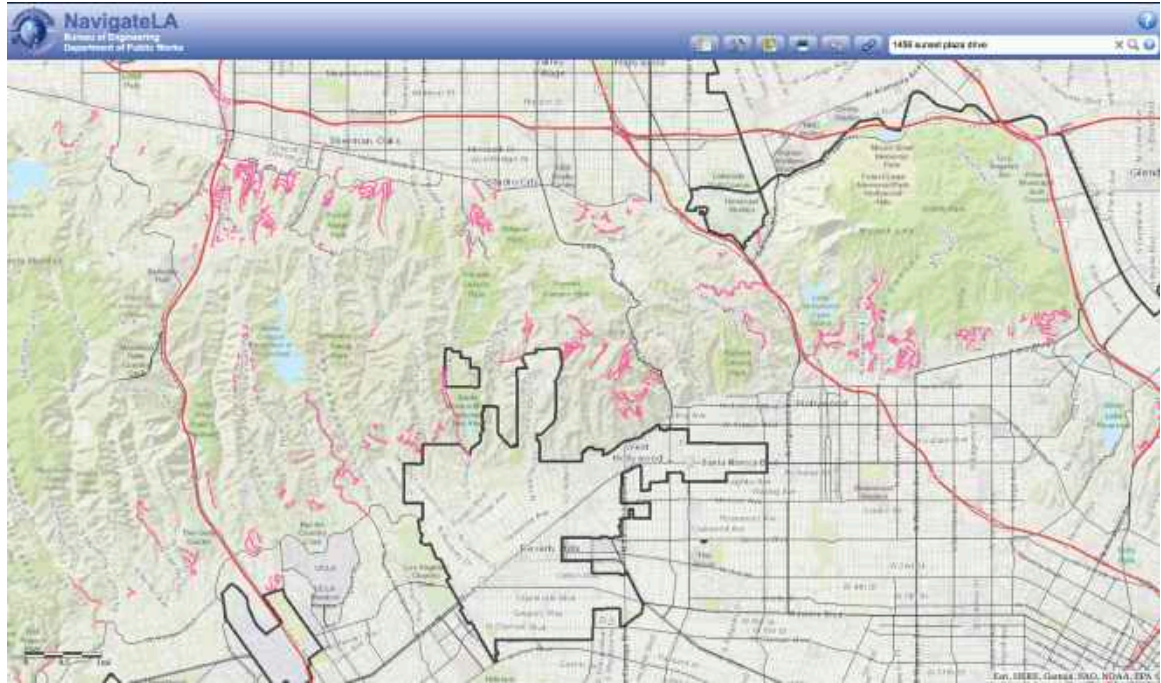
In an attempt to increase public safety, the Fire Department and Department of Transportation have created a program to remove illegally parked vehicles in posted locations within the Very High Fire Hazard Severity Zones. This program was implemented with the assistance of the City Council to remove vehicles that create a hazardous condition on Red Flag Days. Station Commanders were asked to survey their district and identify critical areas where parked vehicles could delay citizens trying to evacuate and fire companies attempting to gain access during a Brush Incident. Station Commanders were asked to identify areas such as very narrow roads, hairpin turns, tight curves, and key intersections that, if not cleared of vehicles, would create a choke point. These intersections were highlighted and given to the Department of Transportation. The Department of Transportation made 1700 new signs and posted them in these identified areas, since January 1, 2006.

The goal of this program is to educate the public on the potential hazards associated with a fast-moving brush fire, and the importance of keeping roadways clear and traffic moving. The fire service has learned from incidents such as the Oakland Hills fire and the Cedar fire that citizens becoming trapped in their vehicles, while evacuating, can lead to a catastrophic situation.

As can be seen from a comparison of **Figures 1a, 1b, and 1c and Figure 4**, not all substandard streets have been designated red flag streets. The EIR for the proposed project needs to include a similar map showing all substandard streets in High Fire Severity areas of the City and all Red Flag streets. As part of the impact analysis, the EIR for the proposed project needs to address the potential emergency access issues associated with increases in traffic and parking violations on red flag streets due to increases in the number of vacationers unfamiliar with the area or these types of parking restrictions.

---

<sup>30</sup> <https://ers.lafd.org/redflag/>



**FIGURE 4 – Red Flag Streets in the Hollywood Hills**

Source: NavigateLA

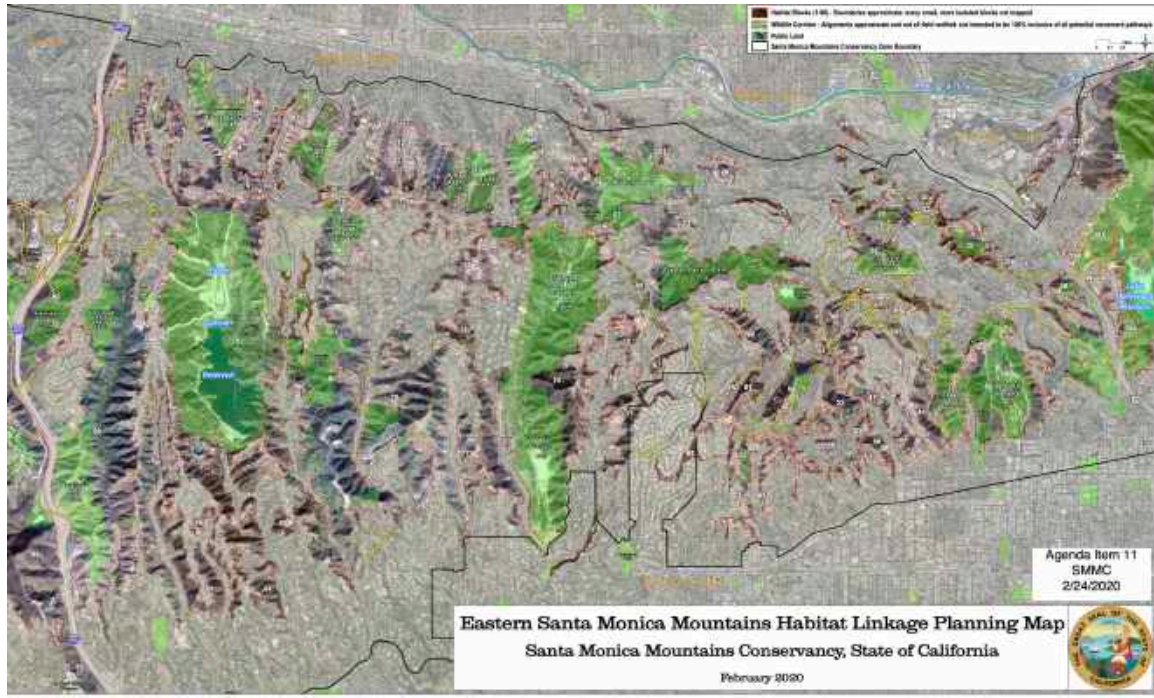
**Santa Monica Mountains Zone** – Portions of the City and the Hollywood Community Plan area are within the Santa Monica Mountains Zone. The Zone was established by the Legislature via the Santa Monica Mountains Conservancy Act, which is codified at Section 33001 et. seq. of the Public Resources Code and which established the Santa Monica Mountains Conservancy as the State agency responsible for carrying out the Act. The Act states as follows:

"The Legislature hereby finds and declares that the **Santa Monica Mountains Zone**, as defined in Section 33105, is a **unique and valuable** economic, **environmental**, agricultural, scientific, educational, and recreational **resource** that should be held in trust for present and future generations; that, as the last large undeveloped area contiguous to the shoreline within the greater Los Angeles metropolitan region, comprised of Los Angeles and Ventura Counties, it provides **essential relief from the urban environment**; that it exists as a single ecosystem in which changes that affect one part may also affect all other parts; and that the preservation and protection of this resource is in the public interest." (Emphasis added).

As part of the Act, the Legislature also stated that "the people of the State of California have an interest in the protection of resources and the use of lands acquired or managed by the conservancy pursuant to this division, and that the conservancy in carrying out its duties pursuant to this division acts on behalf of the State of California." Location in the Santa Monica Mountains Zone is an unusual circumstance.

**Proximity to Wildlife Corridors and Habitat Blocks** – The Santa Monica Mountains contain a number of important habitat linkages and wildlife corridors. The

Santa Monica Mountains Conservancy has adopted the Eastern Santa Monica Mountains Habitat Linkage Map shown in **Figure 5**.<sup>31</sup> This is an unusual circumstance. The proposed project would introduce vacation renters in areas proximate to these corridors and any growth-inducing impacts of the project that resulted in new construction in hillside areas would have the potential to impact habitat blocks and wildlife corridors, depending on where such new development was located.



**FIGURE 5** – Location of Habitat Blocks and Habitat Linkages in the Hollywood Hills  
Source: Santa Monica Mountains Conservancy

**III. THE CONCLUSIONS IN THE NEGATIVE DECLARATION THAT IMPACTS ARE NOT SIGNIFICANT ARE NOT SUPPORTED BY SUBSTANTIAL EVIDENCE – SUBSTANTIAL EVIDENCE INSTEAD SUPPORTS THE POTENTIAL FOR IMPACTS**

The impact judgments in the Negative Declarations rely on an “analysis” contained in Section 3.3.2 of the respective Negative Declarations. As detailed in **Section II** of this letter, the “analysis” is flawed because:

- It is not supported by substantial evidence;
- It fails to provide quantitative data on the location and distribution of existing short-term rentals within the City, Community Plan areas, and census tract needed for an adequate impact analysis;

<sup>31</sup> See: [http://smmc.ca.gov/pdf/attachment5314\\_Staff%20Report.pdf](http://smmc.ca.gov/pdf/attachment5314_Staff%20Report.pdf)  
[http://smmc.ca.gov/pdf/attachment5314\\_Resolution.pdf](http://smmc.ca.gov/pdf/attachment5314_Resolution.pdf)  
[http://smmc.ca.gov/pdf/attachment5314\\_Attachment.pdf](http://smmc.ca.gov/pdf/attachment5314_Attachment.pdf)  
[http://smmc.ca.gov/pdf/attachment5314\\_Map.pdf](http://smmc.ca.gov/pdf/attachment5314_Map.pdf)

- It fails to show that the project will not result in a level of concentration that could result in impacts, or to define an associated threshold of significance;
- It fails to demonstrate that the City has the capacity and will to enforce the two short-term rental ordinances (see **Attachments E and F** for evidence of inadequate enforcement);
- It allows for multiple violations of measures aimed at reducing impacts, before action is taken to prevent further impacts;
- It fails to provide any evidence that impacts from Home-Sharing and illegal Vacation Rentals have been less than significant;
- Evidence provided from the DSPNA shows that short-term rentals do result in noise, traffic and policing impacts (see **Attachment D**);
- It contains unsupported statements, that the proposed project will not affect the long-term housing supply, that are contradicted by evidence in the administrative record which shows, based on the City's own analysis of the number of rental days that could trigger a conversion of long-term to short-term housing, that the revised project is likely to trigger a conversion of long-term housing to short-term housing; and,
- It fails to address the potential for cumulative impacts, while acknowledging that the Home-Sharing Ordinance is a related project that should be addressed (see **Attachment G** for a list of Home-Sharing permits in the Hollywood Hills).

Instead, of providing any real analysis of the potential for impacts, the Negative Declarations make statements like the following, which are not supported by substantial evidence, and rely on the inadequate analysis in Negative Declaration Sections 3.3.2:

### **III.a Hazards (Fire and Emergency Access)**

This is the sum total of the Negative Declaration's analysis of the potential of the proposed project to impair emergency response or exacerbate fire risk, even though the project would permit Vacation Rentals in High Fire Severity Zones, in hillside areas with poor access, which has necessitated the creation of Red Flag Parking Restrictions in many area, and those Vacation Rentals would be occupied by individuals unfamiliar with Red Flag restrictions and the area:

## **IX. HAZARDS AND HAZARDOUS MATERIALS**

### **f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

**No Impact.** Based upon the analysis set forth above, the Project only affects the use of existing residential structures in established neighborhoods, and no new development is authorized or reasonably foreseeable. No aspects of this Project would inhibit access to hospitals, emergency response centers, school locations,

communication facilities, highways and bridges, or airports. Thus, no impacts related to this issue would occur.

**g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?**

**No Impact.** Based upon the analysis set forth above, the Project only affects the use of existing residential structures in established neighborhoods, and no new development is authorized or reasonably foreseeable. There is no reasonably foreseeable increased risks involving wildland fires. Therefore, no impacts related to this issue would occur.

**XVII. TRANSPORTATION/TRAFFIC**

**d) Result in inadequate emergency access?**

**No Impact.** Based upon the analysis set forth above, the Project does not expressly authorize new development, and is not expected to induce growth or development because, due to caps on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a very limited basis. Therefore, no related impacts would occur.

**XX. WILDFIRE**

*If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:*

**a) Substantially impair an adopted emergency response plan or emergency evacuation plan?**

**No Impact.** Based upon the analysis set forth above, the Project does not expressly authorize new development, and is not expected to induce growth or development because, due to caps on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a very limited basis. The Project is not intensifying the use of any existing residential structures beyond the baseline conditions, and thus will not impair any adopted emergency response or evacuation plans. Therefore, no impacts related to this issue will occur.

Clearly these “No Impact” conclusions are not supported by substantial evidence. Portions of the project area are located in High Fire Severity Zones and in hillside areas with substandard street widths, and winding roads. Vacation Rental users are unlikely to read details in the rental contract which explain Red Flag restrictions and may believe they have limited chance of being ticketed for parking violations given the short-term

nature of their stay. Many parts of the High Fire Severity Zones are not designated Red Flag streets, despite substandard street conditions. Party house attendees may park on these substandard streets, since adequate parking would not be available on-site for party events. Party houses result in an excessive number of cars parking on narrow streets in the High Fire Severity Zone. Vacation Renters and party house attendees are less likely than residents to observe such things as no-smoking restrictions. In the event of an emergency or fire situation, vacationers unfamiliar with the area may have difficulty finding the appropriate evacuation route, and may inhibit emergency access. Hillside areas have experienced a number of problems with party houses, where occupancy restrictions and no-smoking and noise restrictions were clearly not observed. The potential for the proposed project to exacerbate these situations and to result in significant fire and emergency access impacts clearly exists.

### **III.b Housing**

This is the sum total of the Negative Declaration's analysis of the project's potential to result in the conversion of long-term to short-term housing:

## **XIV. POPULATION AND HOUSING**

### **b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

**Less than Significant Impact.** Based upon the analysis set forth above, the Project does not expressly authorize new development, and is not expected to induce growth or development because, due to caps on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a very limited basis. Furthermore, the Project requires the dwellings used for Vacation Rentals to be occupied by the owner on an occasional or intermittent basis, meaning this housing would not be available to be otherwise lived in by other people. The Project does not displace any residents, and it prohibits buildings that have been taken out of the rental market via the Ellis Act from being used for Vacation Rentals within seven years of the building's conversion, so there is no incentive for building owners to displace residents to participate in Vacation Rentals. Additional protective measures, including restricting Vacation Rental permits to only owners of dwelling units, limiting the number of Vacation Rental permits an individual or entity can receive to one, citywide, community plan area, and individual building level caps on the number of Vacation Rental permits that can exist at any one time, and distancing requirements from other Vacation Rentals all work to ensure that displacement of existing people is less than significant.

The discussion ignores the information in the administrative record as to the tipping point for the number of allowable rental days per year, which would result in the conversion of long-term to short-term housing units, and the fact that the number of days (90) allowed by the revised project is above the tipping point. The discussion ignores the fact that the proposed Ordinance does not define the terms “occasional” or “intermittent” as it applies to the requirement for some level of owner occupation. Would one overnight stay a year by the owner or ownership entity’s representative be sufficient to meet the residency requirement? The discussion ignores the fact that the proposed Ordinance requires no disclosure of the underlying ownership of entities that may hold title to the Vacation Rental. Given the propensity to use LLC’s or other such entities as real estate title holders, it is not realistic that the City will be able to limit Vacation Rental ownership to only one owner, as it would be easy for individuals to evade the limitation on the number of Vacation Rental permits allowed, that are aimed trying to ensure that only second homes are used as Vacation Rentals, by having ownership of the Vacation Rental held by an LLC or other legal entity? Even the Planning Commission recognized the potential for the project as proposed to result in growth-inducing and housing market impacts, as evidenced by the Planning Commission’s request that additional information be provided to the City Council on the:

Feasibility of requiring documentation showing Vacation Rentals are second homes, not investment properties.

Feasibility of limiting Vacation Rental ownership eligibility to individuals and individual trusts, not limited liability corporations.

Additional information regarding the economic tipping point between a long-term and short-term rental within the construct of other regulatory limitations of the ordinance.

In the absence of a showing that the City can reasonably restrict permits to only demonstrated second homes, and the current information in the record which shows the number of days that units could be rented per year is above the documented tipping point at which there is an incentive for long-term housing to be converted to short-term rentals, the analysis in the Negative Declaration is not supported by substantial evidence. In fact, substantial evidence supports the conclusion that the proposed project has the potential to result in housing and growth-inducing impacts.

### **III.c Noise**

This is the sum total of the Negative Declaration’s analysis of the project’s potential to result in the operational noise impacts:

## **XIII. NOISE**

### **a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in**

**excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

**Less than Significant Impact.** Based upon the analysis set forth above, the Project does not expressly authorize new development, and is not expected to induce growth or development because, due to caps on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a very limited basis. As such, there would not be any noise generated from construction-related activities. **While occupancy levels of Vacation Rentals are presumed to be similar to existing residential uses,** there is the possibility of isolated instances of increases in operational noise levels in homes that are rented as Vacation Rentals simply due to the transient nature of short-term rental guests. However, the Project prohibits the use of sound amplifying equipment and outdoor congregations of more than eight people after 10:00 PM. Furthermore, it is anticipated that **enforcement of existing Municipal Code noise regulations, for which funding is provided by the proposed ordinance,** will generally ensure excess noise does not result from Vacation Rentals. Additionally, the Project states that Vacation Rental Permittees are responsible for all nuisance violations that occur in the Vacation Rental, and the Permittee is charged a minimum inspection fee for anytime an inspection needs to occur at the unit. Thus, while the vast majority of Vacation Rentals are not expected to have elevated noise levels, regulations and penalties have been included in the Project in order to address Vacation Rentals that do violate noise standards. Thus, the impact of the Project on temporary or permanent ambient noise levels is less than significant. (Emphasis added).

As previously noted, the City has yet to impose any fines on short-term rentals for violations (see **Attachment E**). The Negative Declaration provides no substantial evidence to demonstrate that fees collected will be adequate to ensure timely enforcement of noise or other violations. In fact, the Planning Commission recommended that the City Council be provided with information on: “Feasibility of allocating a significant portion of the Transient Occupancy Tax (TOT) and/or fees collected from Vacation Rentals to support affordable housing, permanent supportive housing, and/or housing for the homeless.” Thus, it is unclear that the proposed project will actually result in any improvement in enforcement activities.

The Negative Declarations fail to support the assumption that Vacation Rental use will result in occupancy levels that are similar to existing residential uses. This is particularly unlikely to be the case in areas that have experienced a proliferation of party houses. As documented in **Attachment D**, party houses in the DSPNA area have resulted in a number of noise violations, yet there is no evidence in the record that this has resulted in any fines or other enforcement activities. Anyone who has tried to report

a noise violation is familiar with the difficulty of so doing in the City of Los Angeles. Anyone who has calling the non-emergency police number (877-ASK-LAPD) has probably experienced the excessive hold times, which are interrupted every few minutes by a piercing TTY screeching noise which discourages remaining on hold long enough to report an incident. Given the documented problems with party houses in the DSPNA area, the documented lack of enforcement, the difficulty of reporting violations, and the fact the proposed Ordinance would allow for multiple violations, the proposed project has the potential to result in additional significant short-term noise impacts.

### **III.d Public Services (Police and Fire)**

This is what the Negative Declarations have to say about the project's potential to result in impacts to fire and police services:

## **XV. PUBLIC SERVICES**

### **a) Fire protection?**

**No Impact.** Based upon the analysis set forth above, the Project does not expressly authorize new development, and is not expected to induce growth or development because, due to caps on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a very limited basis. The Project also requires all Vacation Rentals to be equipped with working smoke detectors and fire extinguishers, and requires the posting of signs prohibiting outdoor smoking in Very High Fire Severity Zones. Furthermore, there is no evidence that Vacation Rentals would increase demands on fire protection services so as to require the construction of new or expanded facilities. Therefore, no related impacts would occur.

### **b) Police protection?**

**No Impact.** Based upon the analysis set forth above, the Project does not expressly authorize new development, and is not expected to induce growth or development because, due to caps on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a very limited basis. Furthermore, there is no evidence that Vacation Rentals would increase demands on police protection services so as to require the construction of new or expanded facilities. Therefore, no related impacts would occur.

As previously discussed, the proposed project has the potential to result in growth-inducing impacts by allowing rentals for up to 90 days per year, a number of days per year that is above the tipping point for incentivizing the conversion of long-term housing to short-term rentals. This is likely to result in both the need to construct

additional long-term housing, as well as provide an incentive to construct additional Vacation Rental units. This is likely to increase demand for both police and fire services, which may necessitate personnel and facilities expansion in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services. The potential for this to occur is further evidenced by the fact that the DSPNA felt the need to hire a private security company, in part, to address party house problems within the DSPNA area. The potential for Vacation Rentals to result in additional demand for police service and an increase in service calls is documented in **Attachments D and F**. The proliferation of party houses in High Fire Severity Zones also has the potential to result in additional demands on fire services. The proposed project thus has the potential to result in significant public service impacts.

### **III.e Traffic**

#### **XVII. TRANSPORTATION/TRAFFIC**

##### **d) Result in inadequate emergency access?**

**No Impact.** Based upon the analysis set forth above, the Project does not expressly authorize new development, and is not expected to induce growth or development because, due to caps on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a very limited basis. Therefore, no related impacts would occur.

As previously discussed, the proposed project has the potential to impact emergency access. The statements to the contrary in the Negative Declarations are not supported by substantial evidence.

### **III.f Cumulative Impacts**

#### **XXI. MANDATORY FINDINGS OF SIGNIFICANCE**

##### **b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?**

**No Impact.** For the reasons stated in this Initial Study, the Project would not potentially result in any significant impacts and would not have the potential to contribute to cumulative impacts.

**Attachments H and G** contains a list of current Home-Sharing permits within the Hollywood Hills. **Attachment D** contains a list of known party houses within the DSPNA area. These constitutes the beginnings of a cumulative project’s list. The City

needs to provide a cumulative projects list by Community Plan and by census tract and zip code, so that the location and distribution of cumulative projects is considered as part of the needed environmental analysis of the proposed project. As detailed in this comment letter, the proposed project has the potential to result in significant impacts, and thus, cumulative impacts, when the impacts of the proposed project are added to existing, past, present and reasonably foreseeable future short-term rentals, and housing construction resulting from the project's growth-inducing impacts.

**IV. THE PROJECT'S POTENTIAL TO RESULT IN SIGNIFICANT IMPACTS**

As documented earlier in this letter, the proposed project would allow for a significant expansion in the number of Vacation Rental units within the City in General and the Hollywood Community Plan area in particular. This has the potential to result in a number of significant impacts, some of which would potentially be City-wide, and some of which would occur in areas where Vacation Rentals are concentrated. Of particular concern are impacts in areas such as the Hollywood Hills, since little in the proposed Ordinance would serve to ensure that a disproportional share of a Community Plan's allocated number of Vacation Rentals would not be concentrated in subareas of Community Plan areas, such as the Hollywood Hills. The proposed project has the potential to result in both project and cumulative impacts. **Attachments G and D** represent the beginnings of a cumulative project's list for the Hollywood Hills, but the EIR required to be prepared for the project needs to include a full list of cumulative projects by Community Plan, zip code, and census tract in order to aid in the analysis of the nature and magnitude of potential impacts that would result from the proposed project.

**V. CONCLUSION – THE CITY OF LOS ANGELES HAS VIOLATED CEQA GUIDELINES SECTION 15073.5(d) – AN EIR IS REQUIRED WHEN THERE IS SUBSTANTIAL EVIDENCE THAT THE PROJECT MAY HAVE A SIGNIFICANT IMPACT.**

CEQA Guidelines Section 155064(f)(1) states that an EIR **shall** be prepared when the City has been presented with a fair argument that the project **may** have a significant effect on the environment even when there are arguments to the contrary. In this comment letter we have documented the procedural failing of the City and provided a fair argument supported by substantial evidence of the project's potential for significant impacts.

//

//

//

//

The City must recognize and correct its failures when it comes to CEQA compliance and must prepare an EIR for the proposed project, properly notify all those who have participated to date in the process, circulate the document to the State Clearinghouse, and circulate the EIR for the mandated comment period. The EIR must include mitigation measures to address project impacts.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Hill", is positioned below the word "Sincerely,".

#### ATTACHMENTS

- A. Notice of Availability for the First Negative Declaration
- B. Comparison of the First and Second Negative Declarations
- C. Notice of Availability for the Second Negative Declaration
- D. Documentation of Party House Violations and Problems in the DSPNA Area
- E. Emails Documenting the City's Lack of Enforcement for Short-Term Rentals
- F. Party-Houses Listed on luxuryhomerentals.com – Highlighted Houses Have Had Violations, Party-Related, Noise or Policing Issues
- G. City's Records as of 12/13/2020 Of Home-Sharing Permit Applications in the DSPNA area: 1) Record of Applications For Home-Sharing Permits In Zip Code 90069, Including The Name Of The Applicant/Host As Well As The Property Address; 2) Record of Approved Applications For Home-Sharing Permits in Zip Code 90069 Which Include The Name Of The Applicant/Host, The Address Of The Property, And The Titles/Types Of Documents Submitted In Connection With Permit Application; And, 3) Record Of Denied Applications For Home-Sharing Permits In Zip Code 90069 Including Identifying Information.

# Attachment A

PUBLICATION OF ENVIRONMENTAL NOTICES

LOS ANGELES TIMES

THURSDAY, DECEMBER 19, 2019

Notice is hereby given to the general public of the availability for public review and comment on the following Environmental documents. This publication is intended to serve as our Notice of Intent to adopt the following Negative Declarations (ND's). Documents are also available online at the Dept. of City Planning's website <http://cityplanning.lacity.org/development-services/negative-declaration-public-notices>. CD indicates the Council District, sf indicates square feet.

NEGATIVE DECLARATION-NG-19-057-PL: ENV-2017-557. 7543 North Tampa Avenue; Reseda-West Van Nuys. CD3. Project is the demolition of an existing, 1-story, approx. 4,800 sf, commercial building & construction of a new, 4-story, 45-ft. in height, approx. 22,570 sf, 31-unit apartment building on an approx. 13,095 sf parcel. 31 vehicular parking spaces will be provided on ground floor & in 1 subterranean level. 34 long-term bicycle parking spaces & 4 short-term bicycle parking spaces shall be provided. Project requires cut & export of approx. 5,335 cubic yards of soil. 2 trees will be removed as part of project, 1 at rear of property & 1 in right-of-way, neither of which are considered protected trees. Documents are available for review at: Los Angeles Planning Dept., 6262 Van Nuys Blvd., Rm 430, Van Nuys, CA 91401. Please call (818)374-5038 to review file. You can email your comments to: [valentina.knox.jones@lacity.org](mailto:valentina.knox.jones@lacity.org). REVIEW/COMMENT period begins 12/19/19 & ends on 1/8/20

NEGATIVE DECLARATION-NG-19-058-PL: ENV-2018-4796. ENV-2018-4796-A. ENV-2018-4796-B. ENV-2018-4796-C. ENV-2018-4796-D. ENV-2018-4796-E. ENV-2018-4796-F-1. ENV-2018-4796-F-2. ENV-2018-4796-F-3. 7366 Osage Ave; Westchester-Playa Del Rey. CD11. Property, an irregularly-shaped & mostly flat parcel consisting of 2 parcels totaling 31,173 sf. The larger of 2 parcels, which fronts the street, is currently zoned C2-1VL with a General Plan Designation of "General Commercial". Smaller parcel, located to rear of property, is currently zoned R1-1 with a General Plan Designation of "Low Residential". There is currently an existing mortuary building & an adjoining paved parking lot located on site which will be demolished to accommodate proposed development. Applicant is proposing to develop a new Storage of Household Goods building encompassing a total of 50,382 sf & less than 54 ft. high. Building will consist of 3 structural stories above ground level, as well as 3 levels below ground level

consisting entirely of storage. Ground floor of building will consist of surface-level parking, loading, storage units, & the operational office for facility as well as a community benefit in the way of a community gallery space to be utilized by surrounding Westchester neighborhood. Documents are available for review at: Los Angeles Planning Dept., 200 N Spring St., Room 763, Los Angeles, CA 90012. Please call (213)978-1319 to review file. You can email your comments to: [more.song@lacity.org](mailto:more.song@lacity.org). REVIEW/COMMENT period begins 12/19/19 & ends on 1/8/20

**NEGATIVE DECLARATION-NG-19-059-PL:** ENV-2019-7046. Citywide. CD All. An ordinance establishing regulations to permit use of non-primary residences to be used for short-term rentals as Vacation Rental units. Proposed ordinance includes several limitations on number of Vacation Rentals that will be permitted to operate in the City, including caps on number of permits available citywide & in each census tract, allowing any individual or entity to obtain only 1 Vacation Rental permit, & allowing only owners of a dwelling unit to be eligible to obtain a Vacation Rental permit. Additionally, proposed ordinance prohibits units subject to Rent Stabilization Ordinance (RSO), units subject to affordable housing covenants or otherwise income restricted, Accessory Dwelling Units, & buildings that have been removed from rental market through Ellis Act within the past 7 years from being used for Vacation Rentals. Furthermore, proposed ordinance establishes distancing requirements between Vacation Rentals, limits number of Vacation Rentals that may be allowed in any individual building, & establishes a maximum number of days that a dwelling unit may be rented as a Vacation Rental in a calendar year. Proposed ordinance establishes a process for Vacation Rental permit application, renewal, suspension & revocation, establishes standards & requirements for both owners of Vacation Rental units & hosting platforms, directs a portion of Transient Occupancy Taxes and/or per-night fees derived from Vacation Rentals to Short-Term Rental Enforcement Trust Fund, & establishes fees & fines. Collectively, this is referred to as City's proposed Vacation Rental Ordinance Project ("Project"). Documents are available for review at: Los Angeles Planning Dept., 200 N Spring St., Room 721, Los Angeles, CA 90012. Please call (213)978-1370 to review file. You can email your comments to: [patrick.whalen@lacity.org](mailto:patrick.whalen@lacity.org). REVIEW/COMMENT period begins 12/19/19 & ends on 1/21/20

<b>Local Action</b>	Code Amend.
<b>Project Issues</b>	Aesthetic/Visual
	Agricultural Land
	Air Quality
	Archaeologic-Historic
	Biological Resources
	Drainage/Absorption
	Flood Plain/Flooding
	Forest Land/Fire Hazard
	Geologic/Seismic
	Greenhouse Gas Emissions
Minerals	
Noise	
Population/Housing Balance	
Public Services	
Recreation/Parks	
Schools/Universities	
Septic System	
Sewer Capacity	
Soil Erosion/Compaction/Grading	
Solid Waste	
Toxic/Hazardous	
Traffic/Circulation	
Tribal Cultural Resources	
Water Quality	
Water Supply	
Wetland/Riparian	
Growth Inducing	
Land Use	
Cumulative Effects	
<b>Reviewing Agencies</b>	California Air Resources Board
	California Baldwin Hills Conservancy
	California Department of Conservation
	California Department of Fish and Wildlife, South Coast Region 5
	California Department of Forestry and Fire Protection
	California Department of Housing and Community Development
	California Department of Parks and Recreation
	California Department of Water Resources
	California Highway Patrol
	California Native American Heritage Commission
	California Natural Resources Agency
	California Regional Water Quality Control Board, Los Angeles Region 4
	California Santa Monica Mountains Conservancy
	California State Lands Commission
Department of Toxic Substances Control	
Office of Historic Preservation	
San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy	
Santa Monica Bay Restoration	
State Water Resources Control Board, Division of Water Quality	
California Department of Transportation, District 7	

## Attachments

<b>Environmental Document</b>	Initial Study and Negative Declaration- Final	PDF	468 K
<b>NOC</b>	NOC	PDF	1505 K
<b>State Comments</b>	2019129072_DOT7	PDF	307 K

**Disclaimer:** The Governor’s Office of Planning and Research (OPR) accepts no responsibility for the content or accessibility of these documents. To obtain an attachment in a different format, please contact the lead agency at the contact information listed above. You may also contact the OPR via email at [state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov) or via phone at [\(916\) 445-0613](tel:9164450613). For more information, please visit [OPR’s Accessibility Site](#).

# Attachment B

## Compare PDFs




Find the difference between two PDF files!  
Enter two PDFs and the difference will show up below.

## Try our desktop app

Offline mode, advanced features and more

December 2019 - ENV-2019-7046.pdf 

June 2020 - ENV-2019-7046.pdf 

1

2

3

4

5 Vacation Rentals Ordinance PAGE 2 C  
ity of Los Angeles

6 Initial Study December 2019

7

8

9 INITIAL STUDY

10 TABLE OF CONTENTS

11 Page

12 1. Introduction ..... 3

13 2. Executive Summary ..... 5

14 3. Project Description

1

2 June 2020

3

4

5

6

7 Vacation Rentals Ordinance Project

8 Case Number: ENV-2019-7046-ND

9

10

11 Project Location: Citywide

12 Community Plan Area: Citywide

13 Council District: Citywide

14 Project Description Summary: The  
Vacation Rentals Ordinance is  
an ordinance that

15 establishes regulations to permi  
t the use of certain non-prim  
ary residences as short-term

16 Vacation Rental units. As discus

14 3. Project Description ..... 9

15 3.1. Project Summary ..... 9

16 3.2. Environmental Setting ..... 9

17 3.3. Description of Project ..... 11

18 3.4. Requested Permits and Approvals ..... 16

19 4. Environmental Checklist ..... 17

20 I. Aesthetics ..... 17

21 II. Agriculture and Forestry Resources ..... 19

22 III. Air Quality ..... 22

23 IV. Biological Resources ..... 24

24 V. Cultural Resources ..... 27

25 VI. Energy

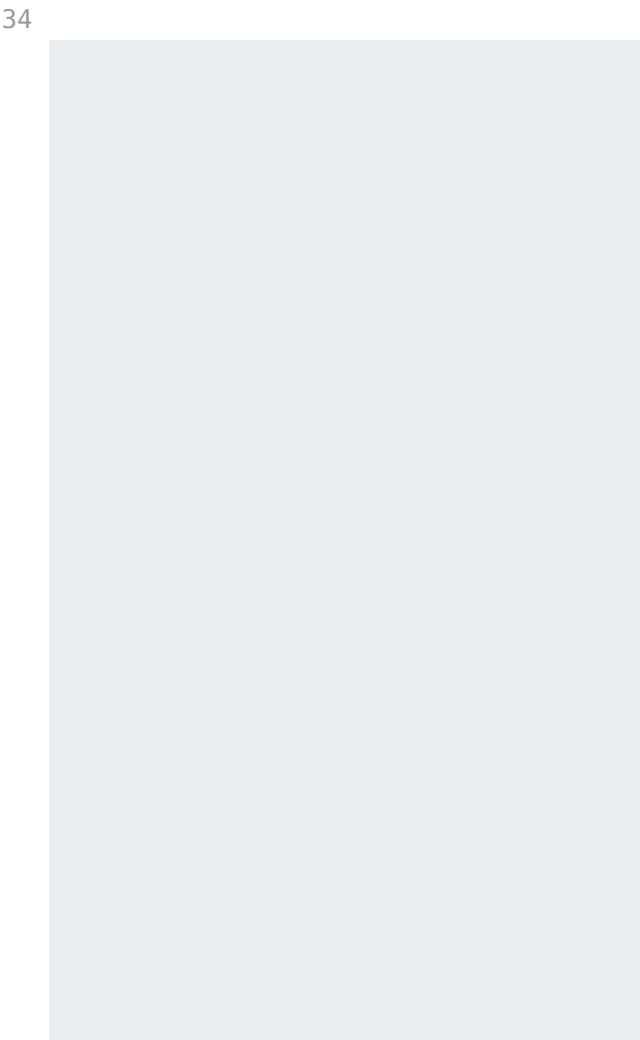
10 vacation rental units. As discussed in more detail in the Project Description, the proposed ordinance includes several limitations on the number of Vacation Rentals that will be permitted to operate in the City, including caps on the number of Vacation Rental permits available citywide and in each community plan area, allowing an individual or entity to obtain only one Vacation Rental permit, and allowing only owners of a dwelling unit to be eligible to obtain a Vacation Rental permit. Additionally, the proposed ordinance prohibits units subject to the Rent Stabilization Ordinance (RSO), units subject to affordable housing covenants or otherwise income restricted, Accessory Dwelling Units, and buildings that have been removed from the rental market through the Ellis Act within the past seven years from being used for Vacation Rentals. Furthermore, the proposed ordinance establishes distancing requirements between Vacation Rentals, limits the number of Vacation Rentals that may be allowed in any individual building, and establishes a maximum number of days that a dw

..... 30

.....  
elling unit may be rented as  
a

28 Vacation Rental in a calendar year. The proposed ordinance establishes a process for Vacation  
29 Rental permit application, renewal, suspension and revocation, establishes standards and  
30 requirements for both Vacation Rental permittees and hosting platforms, directs a portion of  
31 Transient Occupancy Taxes and/or per-night fees derived from Vacation Rentals to the Short-  
32 Term Rental Enforcement Trust Fund, and establishes fees and fines. Collectively, this is  
33 referred to as the City's proposed Vacation Rental Ordinance Project ("Project").

26  
27 VII. Geology and Soils .....  
.....  
..... 31  
28 VIII. Greenhouse Gas Emissions ..  
.....  
..... 34  
29 IX. Hazards and Hazardous Materials .....  
.....  
.... 36  
30 X. Hydrology and Water Quality  
.....  
..... 38  
31 XI. Land Use and Planning .....  
.....  
..... 42  
32 XII. Mineral Resources .....  
.....  
.....



33 XIII. Noise ..... 44

34 XIV. Population and Housing ..... 45

35 XV. Public Services ..... 47

36 XVI. Recreation ..... 49

37 XVII. Transportation/Traffic ..... 50

38 XVIII. Tribal Cultural Resources .. 52

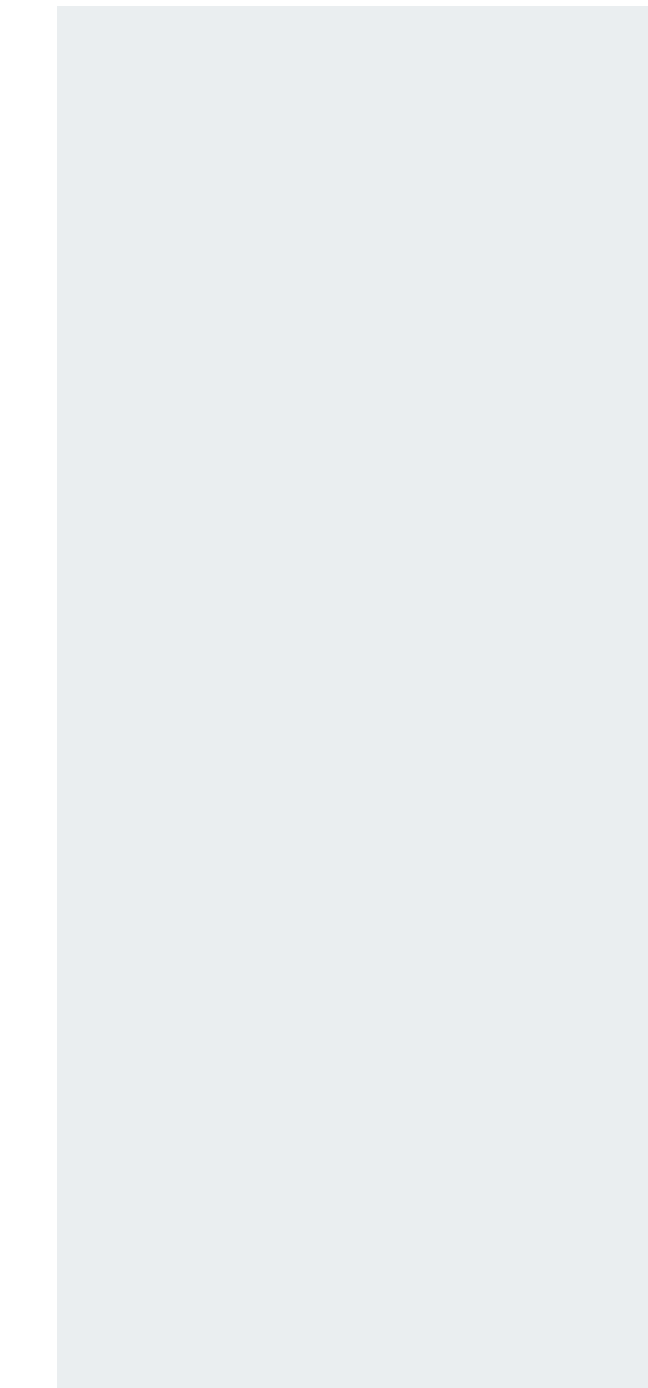
39 XIX. Utilities and Service System s ..... 54

40 XX. Wildfire ..... 57

41

42 XXI. Mandatory Findings of Signific  
ance ..... 59

43  
44  
45  
46



35

36 PREPARED BY:

37 The City of Los Angeles

38 Department of City Planning

39  
40  
41  
42

43

44

45 Vacation Rentals Ordinance PAGE 2 C

City of Los Angeles

46 Initial Study June 2020

47

48

49 INITIAL STUDY

50 TABLE OF CONTENTS

51 Page

52 1. Introduction .....  
.....  
..... 3

53 2. Executive Summary .....  
.....  
..... 5

54 3. Project Description .....  
.....  
..... 9

55 3.1. Project Summary .....  
.....  
..... 9

56 3.2. Environmental Setting .....  
.....  
..... 9

57 3.3. Description of Project .....  
.....  
..... 11

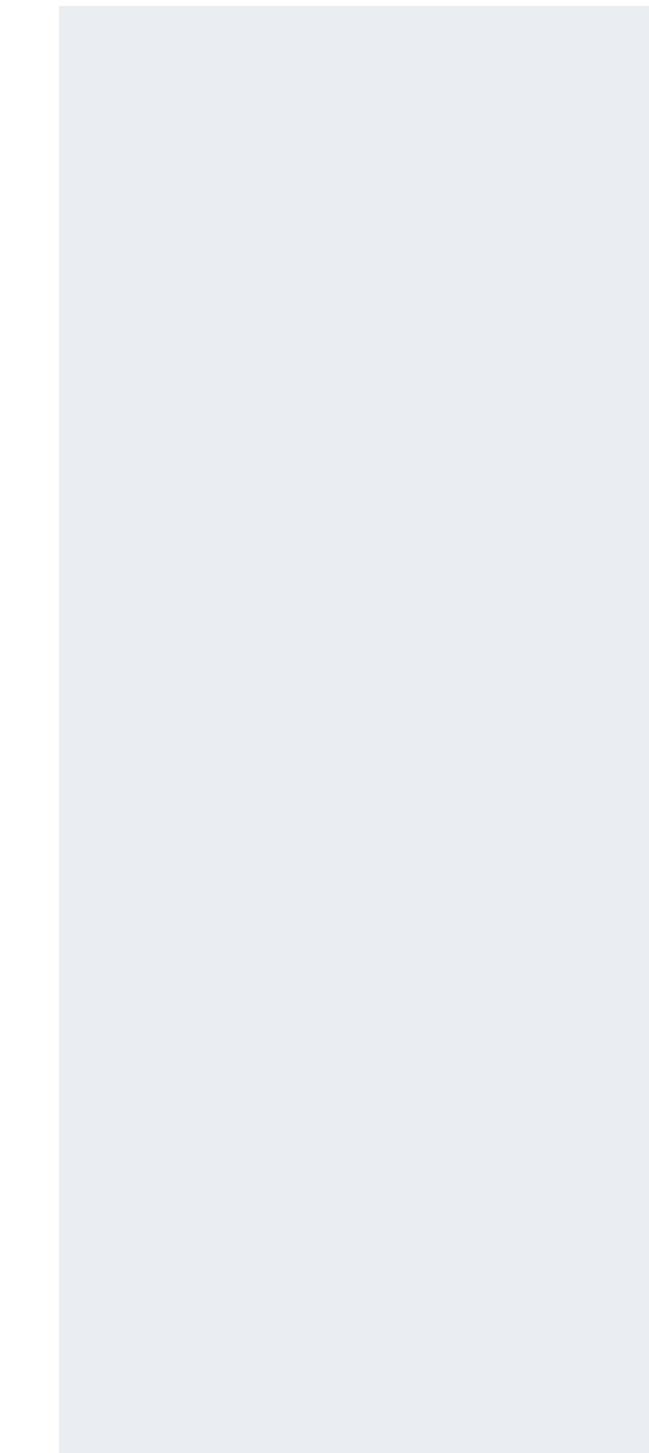
58 3.4. Requested Permits and Approvals .....  
.....  
... 22

59 4. Environmental Checklist .....  
.....  
..... 23

60 I. Aesthetics .....  
.....  
..... 23

61 II. Agriculture and Forestry Reso

	Resources .....	
	.....	
	.....	25
62	III. Air Quality .....	
	.....	
	.....	28
63	IV. Biological Resources .....	
	.....	
	.....	30
64	V. Cultural Resources .....	
	.....	
	.....	33
65	VI. Energy .....	
	.....	
	.....	36
66	VII. Geology and Soils .....	
	.....	
	.....	37
67	VIII. Greenhouse Gas Emissions ..	
	.....	
	.....	40
68	IX. Hazards and Hazardous Materials .....	
	.....	
	.....	42
69	X. Hydrology and Water Quality ..	
	.....	
	.....	45
70	XI. Land Use and Planning .....	
	.....	
	.....	48
71	XII. Mineral Resources .....	
	.....	
	.....	49
72	XIII. Noise .....	
	.....	



47



48



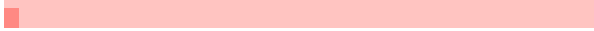
49 Vacation Rentals Ordinance PAGE 3 C  
City of Los Angeles

50 Initial Study December 2019

51



52



..... 50

73 XIV. Population and Housing .....

..... 51

74 XV. Public Services .....

..... 53

75 XVI. Recreation .....

..... 55

76 XVII. Transportation/Traffic .....

..... 56

77 XVIII. Tribal Cultural Resources ..

..... 58

78 XIX. Utilities and Service Systems

..... 60

79 XX. Wildfire .....

..... 63

80 XXI. Mandatory Findings of Signific

ance .....

..... 65

81



82



83

84

85

86

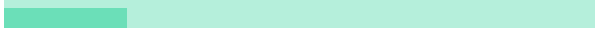
87 Vacation Rentals Ordinance PAGE 3 C  
City of Los Angeles

88 Initial Study June 2020

89



90



53 INITIAL STUDY

54 1 INTRODUCTION

55

56 This Initial Study (IS) document evaluates potential environmental effects resulting from adoption, implementation, and enforcement of the proposed Vacation Rentals Ordinance Project (“Project”). The proposed Project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). Therefore, this document has been prepared in compliance with the relevant provisions of CEQA and the State CEQA Guidelines as implemented by the City of Los Angeles (City). Based on the analysis provided within this Initial Study, the City has concluded that the Project will not result in significant impacts on the environment. This Initial Study and Negative Declaration are intended as informational documents, and are ultimately required to be adopted by the decision maker prior to project approval by the City.

67 1.1 PURPOSE OF AN INITIAL STUDY

69 The California Environmental Quality Act was enacted in 1970 with several basic purposes: (1) to inform governmental decision makers and the public about the potential significant environmental

91 INITIAL STUDY

92 1 INTRODUCTION

93

94 This Initial Study (IS) document evaluates potential environmental effects resulting from adoption, implementation, and enforcement of the proposed Vacation Rentals Ordinance Project (“Project”). The proposed Project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). Therefore, this document has been prepared in compliance with the relevant provisions of CEQA and the State CEQA Guidelines as implemented by the City of Los Angeles (City). Based on the analysis provided within this Initial Study, the City has concluded that the Project will not result in significant impacts on the environment. This Initial Study and Negative Declaration are intended as informational documents, and are ultimately required to be adopted by the decision maker prior to project approval by the City.

105 1.1 PURPOSE OF AN INITIAL STUDY

107 The California Environmental Quality Act was enacted in 1970 with several basic purposes: (1) to inform governmental decision makers and the public about the potential significant

71 effects of proposed projects; (2) to  
to identify ways that environmental  
damage can be avoided or  
72 significantly reduced; (3) to  
prevent significant, avoidable  
damage to the environment by requir  
ing  
73 changes in projects through the  
use of feasible alternatives or  
mitigation measures; and (4) to  
74 disclose to the public the reasons  
behind a project's approval even if  
significant environmental  
75 effects are anticipated.

76  
77

78 An application for the proposed pro  
ject has been submitted to the City  
of Los Angeles Department  
79 of City Planning for discretionary  
review. The Department of City Plan  
ning, as Lead Agency, has  
80 determined that the project is subj  
ect to CEQA, and the preparation of  
an Initial Study is required.

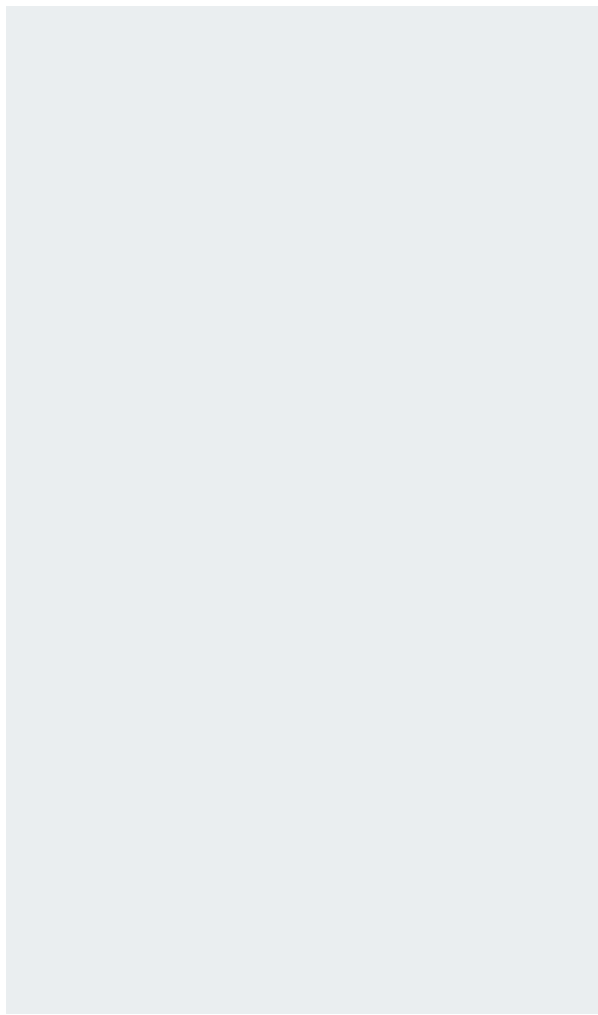
81  
82

83 An Initial Study is a preliminary a  
nalysis conducted by the Lead Agenc  
y, in consultation with other  
84 agencies (responsible or trustee  
agencies, as applicable), to de  
termine whether there is  
85 substantial evidence that a project  
may have a significant effect on th  
e environment. If the Initial  
86 Study concludes that the Projec  
t, with mitigation, may have a  
significant effect on the  
87 environment, an Environmental Impac  
t Report should be prepared; otherw  
ise the Lead Agency  
88 may adopt a Negative Declaration or

109 environmental effects of proposed p  
rojects; (2) to identify ways that  
environmental damage can  
110 be avoided or significantly  
reduced; (3) to prevent signifi  
cant, avoidable damage to the  
111 environment by requiring changes  
in projects through the use of  
feasible alternatives or  
112 mitigation measures; and (4) to  
disclose to the public the rea  
sons behind a project's  
approval  
113 even if significant environmental e  
ffects are anticipated.

may adopt a Negative Declaration or a Mitigated Negative Declaration.

89



90

91 This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006).

94

95

96

97

98

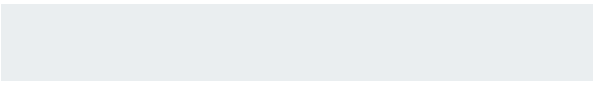
99

100



101 Vacation Rentals Ordinance PAGE 4 City of Los Angeles

102 Initial Study December 2019



114

115 The Department of City Planning, as Lead Agency, has determined that the project is subject to CEQA, and the preparation of an Initial Study is required. An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study concludes that the Project, with mitigation, may have a significant effect on the environment, an Environmental Impact Report should be prepared; otherwise the Lead Agency may adopt a Negative Declaration or a Mitigated Negative Declaration.

123

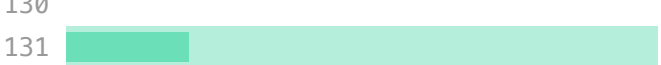
124 This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City of Los Angeles CEQA Guidelines (1981, amended 2006).

127

128

129

130



133 Vacation Rentals Ordinance PAGE 4 City of Los Angeles

134 Initial Study June 2020

103  
104  
105 1.2. ORGANIZATION OF THE INITIAL ST  
UDY  
106  
107 This Initial Study is organized int  
o four sections as follows:  
108  
109 1 INTRODUCTION  
110  
111 Describes the purpose and content o  
f the Initial Study, and provides a  
n overview of the  
112 CEQA process.  
113  
114  
115 2 EXECUTIVE SUMMARY  
116  
117 Provides Project information, ident  
ifies key areas of environmental co  
ncern, and includes  
118 a determination whether the project  
may have a significant effect on th  
e environment.  
119  
120  
121 3 PROJECT DESCRIPTION  
122  
123 Provides a description of the  
environmental setting and the P  
roject, including project  
124 characteristics and a list of discr  
etionary actions.  
125  
126  
127 4 EVALUATION OF ENVIRONMENTAL IMPAC  
TS  
128  
129 Contains the completed Initial Stud  
y Checklist and discussion of the e  
nvironmental factors  
130 that would be potentially affected  
by the Project.  
131

135  
136  
137 1.2. ORGANIZATION OF THE INITIAL ST  
UDY  
138  
139 This Initial Study is organized int  
o four sections as follows:  
140  
141 1 INTRODUCTION  
142  
143 Describes the purpose and content o  
f the Initial Study, and provides a  
n overview of the  
144 CEQA process.  
145  
146 2 EXECUTIVE SUMMARY  
147  
148 Provides Project information,  
identifies key areas of envir  
onmental concern, and  
149 includes a determination whether  
the project may have a signifi  
cant effect on the  
150 environment.  
151  
152 3 PROJECT DESCRIPTION  
153  
154 Provides a description of the  
environmental setting and the P  
roject, including project  
155 characteristics and a list of discr  
etionary actions.  
156  
157 4 EVALUATION OF ENVIRONMENTAL IMPAC  
TS  
158  
159 Contains the completed Initial  
Study Checklist and discussion  
of the environmental  
160 factors that would be potentially a  
ffected by the Project.  
161

132

133

134

135  
136

137 Vacation Rentals Ordinance PAGE 5 C  
ity of Los Angeles

138 Initial Study December 2019  
139  
140

141 INITIAL STUDY

142 2 EXECUTIVE SUMMARY  
143

144

145 PROJECT TITLE VACATION RENTALS ORDI  
NANCE

146 ENVIRONMENTAL CASE NO.  
147 ENV-2019-7046-ND

148 ENV-2019-7375-CE

149 RELATED CASES n/a

150

151 PROJECT LOCATION CITYWIDE

152 COMMUNITY PLAN AREA CITYWIDE

153 GENERAL PLAN DESIGNATION N/A

154 ZONING N/A

155 COUNCIL DISTRICT CITYWIDE

156  
157

158 LEAD AGENCY City of Los Angeles

159 STAFF CONTACT PATRICK WHALEN

160 ADDRESS 200 N. SPRING ST. LOS ANGEL  
ES, CA 90012

161 PHONE NUMBER (213) 978-1370

162 EMAIL PATRICK.WHALEN@LACITY.ORG

163  
164  
165 APPLICANT  
166 CITY OF LOS ANGELES

167 ADDRESS N/A

168 PHONE NUMBER N/A

169

170

171

172

162

163

164

165  
166

167 Vacation Rentals Ordinance PAGE 5 C  
ity of Los Angeles

168 Initial Study June 2020  
169  
170

171 INITIAL STUDY

172 2 EXECUTIVE SUMMARY  
173

174

175 PROJECT TITLE VACATION RENTALS ORDI  
NANCE

176 ENVIRONMENTAL CASE NO. ENV-2019-70  
46-ND

177 ENV-2019-7375-CE

178 RELATED CASES n/a

179

180 PROJECT LOCATION CITYWIDE

181 COMMUNITY PLAN AREA CITYWIDE

182 GENERAL PLAN DESIGNATION N/A

183 ZONING N/A

184 COUNCIL DISTRICT CITYWIDE

185  
186

186 LEAD AGENCY City of Los Angeles

187 STAFF CONTACT PATRICK WHALEN

188 ADDRESS 200 N. SPRING ST. LOS ANGEL  
ES, CA 90012

189 PHONE NUMBER (213) 978-1370

190 EMAIL PATRICK.WHALEN@LACITY.ORG

191  
192 APPLICANT CITY OF LOS ANGELES

193 ADDRESS N/A

194 PHONE NUMBER N/A

195

196

197

198

172  
173  
174  
175  
176  
177  
178  
179  
180  
181  
182  
183  
184  
185  
186  
187  
188  
189  
190  
191  
192  
193  
194  
195

Vacation Rentals Ordinance PAGE 6 C  
ity of Los Angeles

Initial Study December 2019

Executive Summary

The Vacation Rentals Ordinance (Project) is an ordinance that establishes regulations to permit the use of non-primary residences to be used for short-term rentals as Vacation Rental units. The Project includes several limitations on the number of Vacation Rentals that will be permitted to operate in the City, including caps on the number of permits available citywide and in each Census tract, allowing any individual or entity to obtain only one Vacation Rental permit, and allowing only owners of dwelling units to be eligible to obtain a Vacation Rental permit. Additionally, the Project prohibits units subject to the Rent Stabilization Ordinance (RSO), units subject to affordable housing covenants or are otherwise income restricted, Accessory Dwelling Units, and buildings that have been removed from the rental market through the Ellis Act within the past seven years from being used for Vacation Rentals. Furthermore, the

196  
199  
200  
201  
202  
203  
204  
205  
206  
207  
208  
209  
210  
211  
212  
213  
214  
215  
216  
217  
218  
219  
220  
221

Vacation Rentals Ordinance PAGE 6 C  
ity of Los Angeles

Initial Study June 2020

Executive Summary

The Vacation Rentals Ordinance (VRO or Project) is an ordinance that establishes regulations to permit the use of certain non-primary residences as short-term Vacation Rental units. The VRO defines "Vacation Rental" as a Dwelling Unit which is not a property owner's primary residence and is used for Short-Term Rental. As more fully explained in the Project Description below, the Project includes the following types of restrictions on Vacation Rentals: (1) placing numeric caps on the number of permits available citywide and in each community plan area, (2), allowing any individual or entity to obtain only one Vacation Rental permit, (3) allowing only owners of dwelling units to be eligible to obtain a Vacation Rental permit, (4) prohibiting units subject to the Rent Stabilization Ordinance (RSO), units subject to affordable housing covenants or are otherwise income restricted. Accessory Dwelling Units

196 Project establishes distancing requirements between Vacation Rentals, limits the number of Vacation Rentals that may be allowed in any individual building, and establishes a maximum number of days that a dwelling unit may be rented as a Vacation Rental in a calendar year. The Project establishes a process for

199 Vacation Rental permit application, renewal, suspension and revocation, establishes standards

200 and requirements for both owners of Vacation Rental units and hosting platforms, directs a portion

201 of Transient Occupancy Taxes and/or per-night fees derived from Vacation Rentals to the Short-Term Rental Enforcement Trust Fund, and establishes fees and fines.

203

204 The citywide, Census tract, and building level caps, as well as the distancing requirements for

205 Type 1 buildings all serve to limit the concentration of Vacation Rental units at the citywide,

206 neighborhood, block, and building levels. When viewed in conjunction with the eligibility

207 requirements for obtaining a Vacation Rental permit, operational standards, and the prohibitions

208 on the types of buildings that are permitted to be used for Vacation Rentals, it is clear that

restricted, Accessory Dwelling Units, and buildings that have

222 been removed from the rental market through the Ellis Act within the past seven years from

223 being used for Vacation Rentals; (6) establishing minimum distancing requirements between

224 Vacation Rentals, (7) establishing limits on the number of Vacation Rentals that may be allowed

225 in any individual building, and (8) establishing a maximum number of days that a dwelling unit

226 may be rented as a Vacation Rental in a calendar year. The Project establishes a process for

227 Vacation Rental permit application, renewal, suspension and revocation, establishes standards

228 and requirements for both Vacation Rental permittees and hosting platforms, directs a portion of

229 Transient Occupancy Taxes and/or per-night fees derived from Vacation Rentals to the Short-Term Rental Enforcement Trust Fund, and establishes fees and fines.

231

232 The citywide, community plan area, and building level caps, as well as the distancing

233 requirements for Type 1 buildings all serve to limit the concentration of Vacation Rental units at

234 the citywide, neighborhood, block, and building levels. When viewed in conjunction with the

235 eligibility requirements for obtaining a Vacation Rental permit, operational standards, and the

236 prohibitions on the types of buildings that are permitted to be used for Vacation Rentals,

209 Project utilizes multiple measures  
to limit the scope and impact of the  
proposed ordinance on  
210 the environment and the City's hous-  
ing stock. Enforcement of these pro-  
visions will largely utilize  
211 the framework that was established  
to enforce the Home Sharing ordinance,  
and additional  
212 money will be deposited into the Sh-  
ort Term Rental Enforcement Fund to  
expand enforcement  
213 efforts to cover Vacation Rentals.  
These regulations and enforcement  
mechanisms will  
214 necessarily limit the units availab-  
le to be used as Vacation Rentals and  
may discourage  
215 individuals who are currently  
listing dwelling units as Vacation  
Rentals from continuing to do so.  
216 The Project will be applicable to a  
ll parcels in which residential use  
s are permitted or currently  
217 exist.

218  
219  
220  
221  
222

223 OTHER PUBLIC AGENCIES WHOSE APPROVA  
L IS REQUIRED

224 (e.g. permits, financing approval,  
or participation agreement)

225  
226 None.  
227  
228

229

230

237 anticipated that these multiple mea-  
sures will limit the impact of the  
proposed ordinance on the  
238 environment and the City's housing  
stock. Enforcement of these provisi-  
ons will largely utilize the  
239 framework that was established to e-  
nforce the Home Sharing Ordinance,  
and additional money,  
240 collected from a per-night fee  
levied on Vacation Rental permit-  
tees, will be deposited into  
the  
241 Short Term Rental Enforcement Fund  
to expand enforcement efforts to co-  
ver Vacation Rentals.  
242 These regulations and enforcement  
mechanisms will necessarily limit  
the units available to be  
243 used as Vacation Rentals and  
may discourage individuals who  
are currently listing dwelling  
244 units as Vacation Rentals from cont-  
inuing to do so. The Project will b-  
e applicable to all parcels  
245 in which residential uses are permi-  
tted or currently exist.

246  
247  
248  
249  
250

251 OTHER PUBLIC AGENCIES WHOSE APPROVA  
L IS REQUIRED

252 (e.g. permits, financing approval,  
or participation agreement)

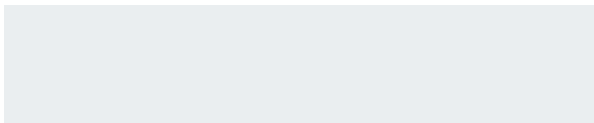
253  
254 None.  
255  
256

257

258  
259

260  
261  
262 Vacation Rentals Ordinance PAGE 7 C  
City of Los Angeles  
263 Initial Study June 2020  
264  
265  
266 ENVIRONMENTAL FACTORS POTENTIALLY A  
FFECTED  
267  
268 The environmental factors checked b  
elow would be potentially affected  
by this project, involving  
269 at least one impact that is a "Pote  
ntially Significant Impact" as indi  
cated by the checklist on the  
270 following pages.  
271  
272 Aesthetics  
273 Greenhouse Gas Emissions Public  
Services  
274  
275 Agriculture & Forestry Resources  
276  
277 Hazards & Hazardous Materials  
278  
279 Recreation  
280  
281 Air Quality  
282  
283 Hydrology / Water Quality  
284  
285 Transportation  
286  
287 Biological Resources  
288  
289 Land Use / Planning  
290  
291 Tribal Cultural Resources  
292  
293 Cultural Resources  
294  
295 Mineral Resources

232

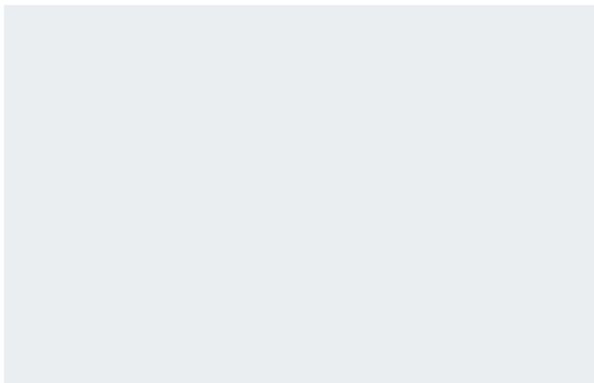


233

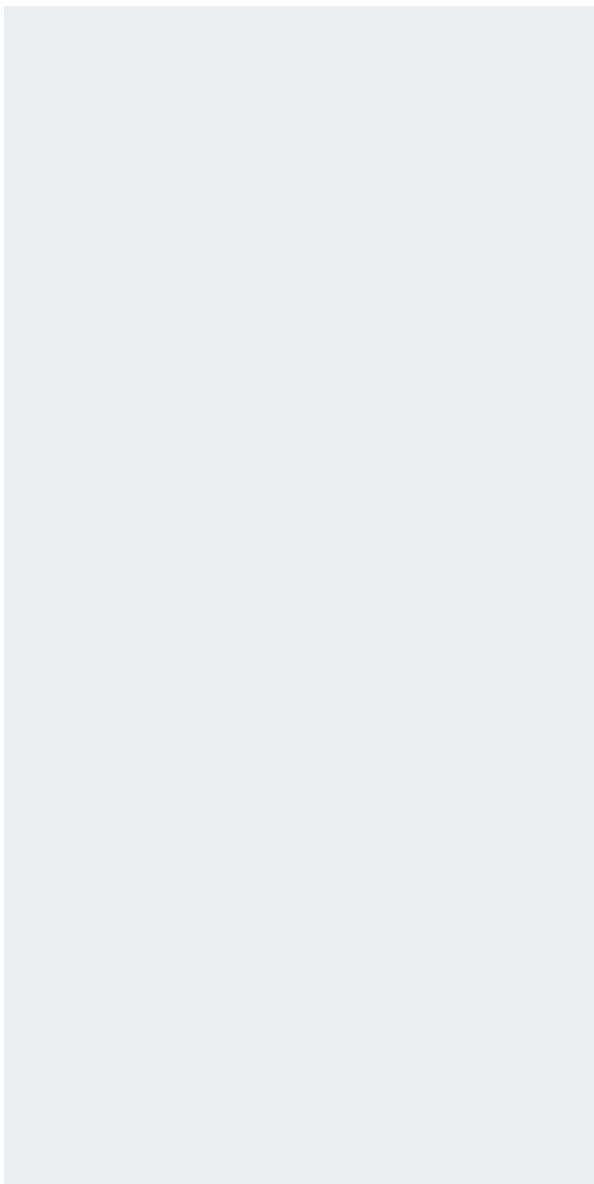
234 Vacation Rentals Ordinance PAGE 8 C  
ity of Los Angeles

235 Initial Study December 2019

236



237



296

Utilities / Service Systems

297

298

299 Energy

300

301 Noise

302 Wildfire

303

304 Geology / Soils

305

306 Population / Housing

307 Mandatory Findings of

308 Significance

309

310

311 DETERMINATION

312 (To be completed by the Lead Agency )

313

314 On the basis of this initial evalua  
tion:

315

316 I find that the proposed proj  
ect COULD NOT have a significant ef  
fect on the environment, and a  
317 NEGATIVE DECLARATION will be prepar  
ed.

318

319 I find that although the prop  
osed project could have a signifi  
cant effect on the environment, there  
will not

320 be a significant effect in this cas  
e because revisions on the project  
have been made by or agreed to by t  
he

321 project proponent. A MITIGATED NEG  
ATIVE DECLARATION will be prepared.

322

323 I find the proposed project MA  
Y have a significant effect on the  
environment and an ENVIRONMENTAL

IMPACT REPORT is required.

324

325

326 I find the proposed project MAY  
have a “potentially significant imp  
act” or “potentially significant un  
less

327 mitigated” impact on the environmen  
t, but at least one effect 1) has b  
een adequately analyzed in an earli  
er

328 document pursuant to applicable leg  
al standards, and 2) has been addre  
ssed by mitigation measures

329 based on earlier analysis as descri  
bed on attached sheets. An ENVIRON  
MENTAL IMPACT REPORT is

330 required, but it must analyze only  
the effects that remain to be addre  
ssed.

331

332 I find that although the propo  
sed project could have a significan  
t effect on the environment, becaus  
e all

333 potentially significant effects (a)  
have been analyzed adequately in an  
earlier EIR or NEGATIVE

334 DECLARATION pursuant to applicable  
standards, and (b) have been avoide  
d or mitigated pursuant to that

335 earlier EIR or NEGATIVE DECLARATION  
, including revisions or mitigation  
measures that are imposed

336 upon the proposed project, nothing  
further is required.

337

338

339 Patrick Whalen

340 PRINTED NAME

341

342

343

344 SIGNATURE

345

City Planning Associate

346

347 TITLE

348

349 5/29/20

350

351 DATE

352

353

354

355

356

357

358

359 Vacation Rentals Ordinance PAGE 8 C  
ity of Los Angeles

360 Initial Study June 2020

361

362

238 EVALUATION OF ENVIRONMENTAL IMPACTS

239

240 1) A brief explanation is required for all answers except "No Impact" answers that are adequately

241 supported by the information source  
s a lead agency cites in the parent  
heses following each question.

242 A "No Impact" answer is adequately supported if the referenced information sources show that the

243 impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault

244 rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors

245 as well as general standards (e.g., the project will not expose sensitive

363 EVALUATION OF ENVIRONMENTAL IMPACTS

364

365 1) A brief explanation is required for all answers except "No Impact" answers that are adequately

366 supported by the information source  
s a lead agency cites in the parent  
heses following each question.

367 A "No Impact" answer is adequately supported if the referenced information sources show that the

368 impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault

369 rupture zone). A "No Impact" answer should be explained where it is based on project-specific

370 factors as well as general standards (e.g., the project will not expose sensitive

the project will not expose sensitive receptors to pollutants, based

246 on a project-specific screening analysis).

247 2) All answers must take account of the whole action involved, including off-site as well as on-site,

248 cumulative as well as project-level, indirect as well as direct, and construction as well as operational  
249 impacts.

250 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist

251 answers must indicate whether the impact is potentially significant, less than significant with mitigation,

252 or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence

253 that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when

254 the determination is made, an EIR is required.

255 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the

256 incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to

257 "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly

258 explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier

3 (e.g.), the project will not expose sensitive receptors to pollutants

371 based on a project-specific screening analysis).

372 2) All answers must take account of the whole action involved, including off-site as well as on-site,

373 cumulative as well as project-level, indirect as well as direct, and construction as well as operational  
374 impacts.

375 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist

376 answers must indicate whether the impact is potentially significant, less than significant with

377 mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial

378 evidence that an effect may be significant. If there are one or more "Potentially Significant Impact"

379 entries when the determination is made, an EIR is required.

380 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the

381 incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to

382 "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly

383 explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier

259 Analysis," as described in (5) below, may be cross referenced).

260 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an

261 effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D).

262 In this case, a brief discussion should identify the following:

263 a) Earlier Analysis Used. Identify and state where they are available for review.

264 b) Impacts Adequately Addressed. Identify which effects from the above checklist were within

265 the scope of and adequately analyzed in an earlier document pursuant to applicable legal

266 standards, and state whether such effects were addressed by mitigation measures based

267 on the earlier analysis.

268 c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures

269 Incorporated," describe the mitigation measures which were incorporated or refined from

270 the earlier document and the extent to which they address site-specific conditions for the

271 project.

272 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general

273 plans, zoning ordinances). Reference to a previously prepared

384 Analysis," as described in (5) below, may be cross referenced).

385 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process,

386 an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063

387 (c)(3)(D). In this case, a brief discussion should identify the following:

388 a) Earlier Analysis Used. Identify and state where they are available for review.

389 b) Impacts Adequately Addressed. Identify which effects from the above checklist were

390 within the scope of and adequately analyzed in an earlier document pursuant to

391 applicable legal standards, and state whether such effects were addressed by mitigation

392 measures based on the earlier analysis.

393 c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation

394 Measures Incorporated," describe the mitigation measures which were incorporated or

395 refined from the earlier document and the extent to which they address site-specific

396 conditions for the project.

397 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general

398 plans, zoning ordinances). Reference to a previously prepared

274 outside document should, where  
appropriate, include a reference  
to the page or pages where th  
e

275 statement is substantiated

276 7) Supporting Information Sourc  
es: A sources list should be  
attached, and other sources use  
d or

277 individuals contacted should be cit  
ed in the discussion.

278 8) This is only a suggested  
form, and lead agencies are fr  
ee to use different formats; h  
owever, lead

279 agencies should normally address  
the questions from this checkli  
st that are relevant to a pro  
ject's

280 environmental effects in whichever  
format is selected.

281 9) The explanation of each issue  
should identify:

282 a) The significance criteria or thr  
eshold, if any, used to evaluate ea  
ch question; and

283 b) The mitigation measure identifie  
d, if any, to reduce the impact to  
less than significance.

284

285

286

287

288 Vacation Rentals Ordinance PAGE 9 C  
ity of Los Angeles

289 Initial Study December 2019

290

291

292 INITIAL STUDY

293 3 PROJECT DESCRIPTION

294

295 3.1 PROJECT SUMMARY

399 outside document should, where  
appropriate, include a reference  
to the page or pages where th  
e

400 statement is substantiated

401 7) Supporting Information Sources  
: A sources list should be at  
tached, and other sources used  
or

402 individuals contacted should be cit  
ed in the discussion.

403 8) This is only a suggested fo  
rm, and lead agencies are free  
to use different formats; howev  
er, lead

404 agencies should normally address  
the questions from this checkli  
st that are relevant to a pro  
ject's

405 environmental effects in whichever  
format is selected.

406 9) The explanation of each issue sh  
ould identify:

407 a) The significance criteria or thr  
eshold, if any, used to evaluate ea  
ch question; and

408 b) The mitigation measure identifie  
d, if any, to reduce the impact to  
less than significance.

409

410

411

412

413 Vacation Rentals Ordinance PAGE 9 C  
ity of Los Angeles

414 Initial Study June 2020

415

416

417 INITIAL STUDY

418 3 PROJECT DESCRIPTION

419

420 3.1 PROJECT SUMMARY

421

422 The Vacation Rentals Ordinance is a  
n ordinance that establishes regula

423 of certain non-primary residence  
424 s as short-term Vacation Rental  
425 units. As discussed in more  
426 detail in the Project Descripti  
427 on, the proposed ordinance incl  
428 udes several limitations on the  
429 number of Vacation Rentals that wil  
430 l be permitted to operate in the Ci  
431 ty, including caps on the  
432 number of Vacation Rental permi  
433 ts available citywide and in e  
434 ach community plan area,  
435 allowing an individual or entit  
436 y to obtain only one Vacation  
437 Rental permit, and allowing onl  
438 y  
439 owners of a dwelling unit to  
440 be eligible to obtain a Vacati  
441 on Rental permit. Additionally,  
442 the  
443 proposed ordinance prohibits uni  
444 ts subject to the Rent Stabili  
445 zation Ordinance (RSO), units  
446 subject to affordable housing c  
447 ovenants or otherwise income re  
448 stricted, Accessory Dwelling  
449 Units, and buildings that have been  
450 removed from the rental market thro  
451 ugh the Ellis Act within  
452 the past seven years from bein  
453 g used for Vacation Rentals. F  
454 urthermore, the proposed  
455 ordinance establishes distancing re  
456 quirements between Vacation Rentals  
457 , limits the number of  
458 Vacation Rentals that may be a  
459 llowed in any individual buildi  
460 ng, and establishes a maximum  
461 number of days that a dwelling unit  
462 may be rented as a Vacation Rental  
463 in a calendar year. The  
464 proposed ordinance establishes a  
465 process for Vacation Rental per  
466 mit application approval

mit application, renewal,  
437 suspension and revocation, estab-  
lishes standards and requiremen-  
s for both Vacation Rental  
438 permittees and hosting platforms,  
directs a portion of Transient  
Occupancy Taxes and/or per-  
439 night fees derived from Vacatio-  
n Rentals to the Short-Term Re-  
ntal Enforcement Trust Fund,  
440 and establishes fees and fines. Col-  
lectively, this is referred to as t-  
he City's proposed Vacation  
441 Rental Ordinance Project ("Project")  
).

296  
297 An ordinance establishing regulatio-  
ns to permit the use of non-primary  
residences to be used for  
298 short-term rentals as Vacation Rent-  
al units. The proposed ordinance in-  
cludes several limitations  
299 on the number of Vacation Rentals t-  
hat will be permitted to operate in  
the City, including caps on  
300 the number of permits available cit-  
ywide and in each Census tract, all-  
owing any individual or entity  
301 to obtain only one Vacation Rental  
permit, and allowing only owners of  
dwelling units to be eligible  
302 to obtain a Vacation Rental permit.  
Additionally, the proposed ordinanc-  
e prohibits units subject to  
303 the Rent Stabilization Ordinance  
(RSO), units subject to afforda-  
ble housing covenants or  
304 otherwise income restricted, Acc-  
essory Dwelling Units, and buil-  
dings that have been removed  
305 from the rental market through  
the Ellis Act within the past  
seven years from being used fo-  
r

442

443

306 Vacation Rentals. Furthermore, t  
he proposed ordinance establishe  
s distancing requirements  
307 between Vacation Rentals, limits  
the number of Vacation Rentals  
that may be allowed in any  
308 individual building, and establishe  
s a maximum number of days that a d  
welling unit may be rented  
309 as a Vacation Rental in a cal  
endar year. The proposed ordina  
nce establishes a process for  
310 Vacation Rental permit application,  
renewal, suspension and revocation,  
establishes standards  
311 and requirements for both owners of  
Vacation Rental units and hosting p  
latforms, directs a portion  
312 of Transient Occupancy Taxes and/or  
per-night fees derived from Vacatio  
n Rentals to the Short-  
313 Term Rental Enforcement Trust Fund,  
and establishes fees and fines. Col  
lectively, this is referred  
314 to as the City's proposed Vacation  
Rentals Ordinance Project ("Proje  
ct").

315

### 316 3.2 ENVIRONMENTAL SETTING

317

#### 318 3.2.1 Project Location

319 Citywide

#### 320 3.2.2 Existing Conditions

321

322 For the purposes of CEQA, the  
analysis of potential environmental  
impacts from a "project" is

323 based upon a comparison of the pote  
ntial impacts of a project with the  
baseline. The baseline is

324 generally the existing conditions  
at the time the City commences the  
environmental review of

### 444 3.2 ENVIRONMENTAL SETTING

445

#### 446 3.2.1 Project Location

447 Citywide

#### 448 3.2.2 Existing Conditions

449

450 For the purposes of CEQA, the  
analysis of potential environmen  
tal impacts from a "project"  
is

451 based upon a comparison of the pote  
ntial impacts of a project with the  
baseline. The baseline is

452 generally the existing physical c  
onditions at the time the City  
commences the environmental

325 the project (CEQA Guidelines, section 15125(a)). This is the case even when the existing  
326 conditions are the result of prior illegal activities, including zoning and building code violations  
327 (See Riverwatch v. County of San Diego (1999) 76 Cal.App.4

328 th  
329 1428, 1452-1453, Citizens for  
330 East Shore Park v. State Lands Commission (2011) 202 Cal.App.4

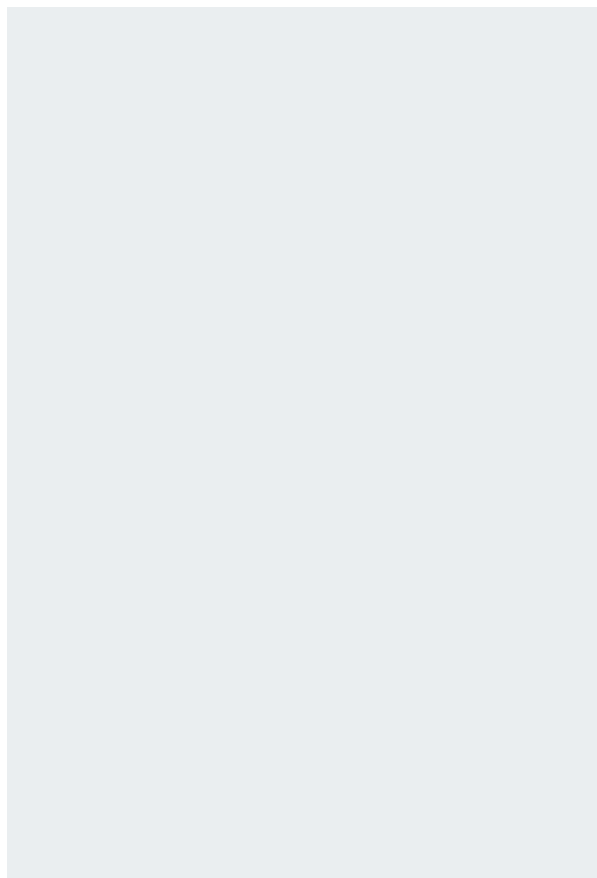
331 th  
332 549, 559-560). Though  
333 Vacation Rental activity in the City of Los Angeles is prohibited by the City's Zoning Code, the  
334 City had not actively enforced the City's prohibition of Vacation Rentals due to limited resources  
335 until very recently. In December of 2018, the Los Angeles City Council adopted the Home-  
336 Sharing Ordinance, which established a legal process whereby residents may be authorized to  
337 rent their primary residence to short-term visitors. As such, the Home-Sharing Ordinance  
338 continued to prohibit Vacation Rentals as defined by the Proposed Project. As an ordinance that

339  
340  
341

453 review of the project (CEQA Guidelines, section 15125(a)). This is the case even when the  
454 existing conditions are wholly or partially the result of prior illegal activities, including zoning and  
455 building code violations (See Riverwatch v. County of San Diego (1999) 76 Cal.App.4

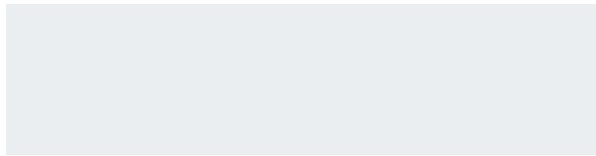
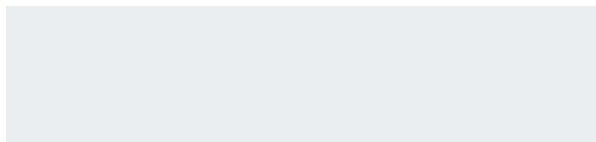
456 th  
457 1428,  
458 1452-1453, Citizens for East Shore Park v. State Lands Commission (2011) 202 Cal.App.4

459 th



460  
461 549, 559-560). Though Vacation Rental activity in the City of Los Angeles is prohibited by the  
462 City's Zoning Code, the City had not actively enforced the City's prohibition of Vacation Rentals  
463 due to limited resources until very

342



343 Vacation Rentals Ordinance PAGE 10  
City of Los Angeles

344 Initial Study December 2019

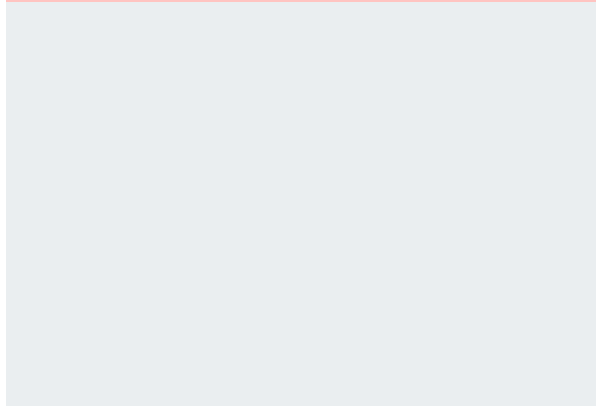
345

346

347 regulates a portion of the short-term rental market, the Home-Sharing ordinance is a related

348 project to the proposed Vacation Rental Ordinance, and its effect on the presence of short-term

349 rentals in the City must be analyzed when discussing existing conditions.



350

351 While the Home-Sharing Ordinance became effective in July of 2019, enforcement of the

352 ordinance did not begin until November of 2019 in order to provide a transition period for hosts,

353 and to allow the City to establish its enforcement mechanisms and properly staff the

354 enforcement body charged with implementing the ordinance. Given the recent date of

355 enforcement of this ordinance, data

463 due to limited resources until very recently. In December of 2018, the Los Angeles City Council

464

465

466

467

468 Vacation Rentals Ordinance PAGE 10  
City of Los Angeles

469 Initial Study June 2020

470

471

472 adopted the Home-Sharing Ordinance, which established a legal process whereby residents

473 may be authorized to rent their primary residence to short-term visitors. As such, the Home-Sharing Ordinance continued to prohibit Vacation Rentals as defined by the Proposed Project.

474 As an ordinance that regulates a portion of the short-term rental market, the Home-Sharing ordinance is a related project to the proposed Vacation Rental Ordinance, and its effect on the

475 presence of short-term rentals in the City must be analyzed when discussing existing conditions.

476 While the Home-Sharing Ordinance became effective in July of 2019, enforcement of the

477 ordinance did not begin until November of 2019 in order to provide a transition period for hosts,

478

479 and to allow the City to establish its enforcement mechanisms and procedures and properly

480 staff the enforcement body charged with implementing the ordinance. Given the recent date of

481 enforcement of this ordinance, data

482

483

355 enforcement of this ordinance, data  
on the number of short-term rentals  
is currently uncertain,  
356 as the market is in considerable fl  
ux. However, the City does have dat  
a on the number of short-  
357 term rentals, including a breakdown  
on the number that were estimated t  
o be operating as  
358 Vacation Rentals, prior to the Home  
Sharing Ordinance being implemented  
. Additionally, the  
359 City also has evidence of the remov  
al of thousands of units from the r  
olls of short-term rental  
360 platforms in response to hosts and  
owners either not following the reg  
istration requirements or  
361 for violating the provisions of the  
Home Sharing Ordinance. When one ev  
aluates these data  
362 points, it is apparent that the Hom  
e Sharing Ordinance has already red  
uced the scope of short-  
363 term rental activity in the City, t  
hus rendering previous estimates on  
the baseline level of  
364 Vacation Rental activity invalid.  
This data also speaks to the effect  
iveness of regulating the  
365 short-term rental market in terms o  
f reducing its activity and, conse  
quently, the potential  
366 negative side effects that can acco  
pany short-term rental activity,  
such as impacts to housing  
367 availability, nuisance issues such  
as noise, and disruptions to the ch  
aracter of residential

368 neighborhoods

483 enforcement of this ordinance,  
data on the number of short-te  
rm rentals is incomplete, as th  
e  
484 short-term rental market is in t  
ransition. However, the City do  
es have data on the number of  
485 short-term rentals, including a bre  
akdown on the number that were esti  
mated to be operating as  
486 Vacation Rentals, prior to the  
Home Sharing Ordinance being im  
plemented. Additionally, the  
487 City also has evidence of the  
removal of thousands of units  
from the rolls of short-term r  
ental  
488 platforms in response to hosts eith  
er not following the registration r  
equirements or for violating  
489 the provisions of the Home  
Sharing Ordinance. When one eva  
luates these data points, it is  
490 apparent that the Home Sharing Ordi  
nance has already reduced the scope  
of short-term rental  
491 activity in the City, thus ren  
dering pre-HSO enforcement  
estimates of the level of Vacati  
on  
492 Rental activity outdated. This data  
also speaks to the effectiveness of  
regulating the short-term  
493 rental market in terms of  
reducing its activity and, cons  
equently, the potential negative  
side  
494 effects that can accompany  
short-term rental activity, such  
as impacts to housing availabil  
ity,  
495 nuisance issues such as noise,  
and possible disruptions to the  
character of residential  
496 neighborhoods

369

370 While the baseline of Vacation Rental activity must be assumed to be very low given the

371 effectiveness of the Home Sharing Ordinance's enforcement efforts, one must assume that

372 there are still operators who have found a way to rent units as Vacation Rentals, either through

373 exploiting regulatory loopholes, listing on new or private platforms, or through other means.

374 Even though the City will develop additional enforcement tools to close these loopholes, until

375 they are closed, this illegal activity is likely to continue. Additionally, data provided to City

376 Planning prior to the enforcement of the Home Sharing Ordinance showed that, while short-term

377 rental activity existed all over the city, it was most prevalent in a select number of

378 neighborhoods that serve as the largest destinations for tourists to the City. According to data

379 provided to the Department by Host Compliance, AirBnB, VRBO, and Keep Neighborhoods

380 First, the neighborhoods with the highest concentrations of short-term rentals include Venice,

381 Hollywood, Silver Lake, Echo Park, and Downtown Los Angeles. Thus, it can be reasonably

382 assumed that there is an existing baseline level of activity, and this

497

498 For purposes of the analysis in this Initial Study, the City is conservatively estimating that the

499 baseline of Vacation Rental activity is low given the implementation and enforcement of the

500 Home Sharing Ordinance. However, based upon reports of a certain number of Vacation

501 Rentals still being listed in contravention of the HSO's restrictions, the City reasonably believes

502 that there are still operators who have found a way to rent units as Vacation Rentals, either

503 through exploiting regulatory loopholes, listing on new or private platforms, or through other

504 means. In order to obtain an estimate of the number of Vacation Rentals currently operating

505 illegally, City Planning, using data obtained from Host Compliance, compared the number of

506 whole home listings across platforms (8,719), with the number of whole home units that are

507 registered through the HSO (3,089) to estimate that there are 5,630 Vacation Rentals currently

508 in operation. However, as enforcement of the HSO continues, and hosting platforms continue to

509 remove unregistered operators, this current estimation would likely fluctuate. Until there is a

510 system in place to permit and regulate Vacation Rentals, the

activity is disproportionately

City will not be able to reliably

511 trace the precise amount of Vacation Rental activity occurring, and illegal Vacation Rental activity is likely to continue.

513

514 Additionally, data provided to City Planning prior to the enforcement of the Home Sharing Ordinance showed that, while short-term rental activity existed all over the city, it was most

516 prevalent in a select number of neighborhoods that serve as the largest destinations for tourists to the City. According to data provided to the Department by Host Compliance, AirBnB, VRBO,

518 and Keep Neighborhoods First, the neighborhoods with the highest concentrations of short-term

519 rentals include Venice, Hollywood, Silver Lake, Echo Park, and Downtown Los Angeles. Thus, it

520 can be reasonably assumed that there is an existing baseline level of activity, and this activity is

383 concentrated in a few neighborhoods in the City.

521 concentrated in a few neighborhoods in the City.

384

522

523

385 By allowing a path forward for Vacation Rentals to legally operate in the City, it can be reasonably assumed that the presence of Vacation Rentals will increase from the presumed

524

525

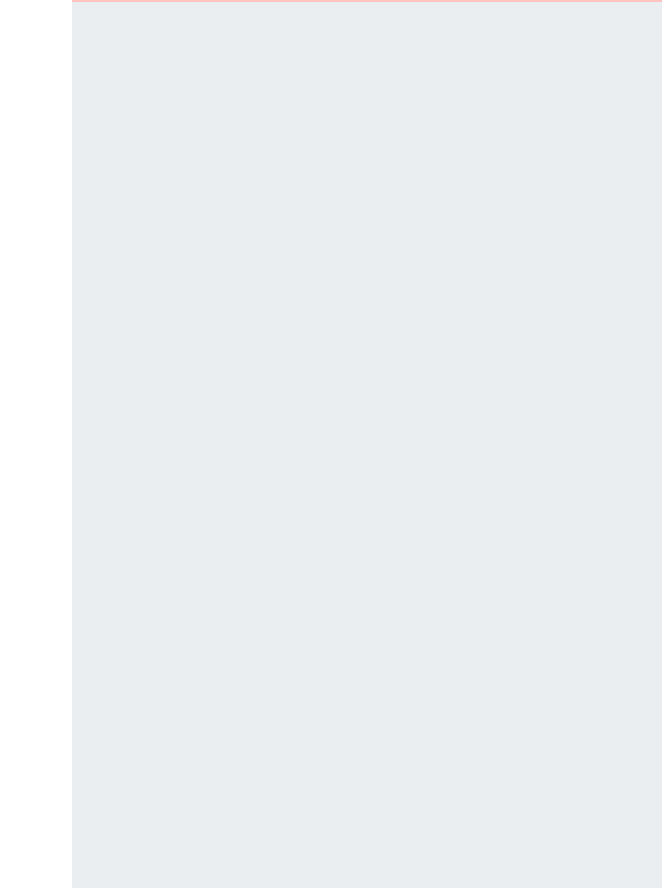
387 very low existing baseline upon the adoption of this proposed ordinance. However, there are

526 Vacation Rentals Ordinance PAGE 11 City of Los Angeles

388 myriad measures contained in the Project to ensure that Vacation

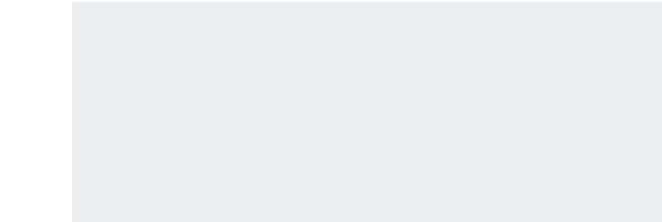
527 Initial Study June 2020

ject to ensure that vacation Rentals will have a minimal impact on the environment, housing availability, and the existing residential character of neighborhoods. The ordinance also contains specific provisions to address the known existing



condition of the overconcentration of Vacation Rental units in certain neighborhoods. Additional details of the provisions of the proposed ordinance and how they will work to reduce potential

impacts associated with this Project are contained in the "Analysis" section of this report.



By allowing a path forward for Vacation Rentals to legally operate in the City, it can be reasonably assumed that the presence of Vacation Rentals will increase from the presumed very low existing baseline upon the adoption of this proposed ordinance. However, there are myriad measures contained in the Project to ensure that Vacation Rentals will have a minimal impact on the environment, housing availability, and the existing residential character of neighborhoods. The ordinance also contains specific provisions to address the known existing

condition of the overconcentration of Vacation Rental units in certain neighborhoods. Additional details of the provisions of the proposed ordinance and how they will work to reduce potential

impacts associated with this Project are contained in the "Analysis" section of this report.

3.3 DESCRIPTION OF PROJECT  
3.3.1 Project Overview  
The Project includes regulations to

545 The Project includes regulations to  
546 permit only a limited number of Vac  
ation Rentals to operate  
547 in the City. In addition, Vaca  
tion Rentals permitted by the P  
roject would be subject to  
548 regulations and operational standar  
ds. Attached to this Initial Study  
is the draft VRO. The VRO  
549 includes the following key provisio  
ns:

395 549  
396 550 Definition of Vacation Rental

551  
552 1. A Vacation Rental is defined  
as a Dwelling Unit which is no  
t a property owner's  
553 primary residence and is used for S  
hort-Term Rental. (Draft Ord. Sect  
ion 1, 12.03)

397 554  
398 555 Limitations on Dwelling Units that  
are Permitted to be Used as Vacatio  
n Rentals

556  
557 1. Only an individual owner of  
a Dwelling Unit may apply for  
a permit for a Vacation  
558 Rental. Renters or lessees of D  
welling Units may not receive a  
Vacation Rental  
559 Permit (Draft Ord. Section 2: 12.22  
A.34(b)(1) & (c)(2).  
560 2. No person or entity may app  
ly for or otherwise operate mo  
re than one Vacation  
561 Rental at a time. (Draft Ord. Sect  
ion 2: 12.22 A.34(c)(2)(ii)(c))  
562 3. Only Dwelling Units occupied on  
an occasional or intermittent basis  
by the owner are  
563 eligible to be used as Vacation Ren  
tals. An owner of a dwelling unit w

no is applying  
564 for a Vacation Rental permit must submit an affidavit, under the penalty of perjury,  
565 stating that he or she occupies the unit intended to be used as a Vacation Rental on  
at least an occasional basis annually. (Draft Ord. Section 2: 12.22 A.34 (c)(2)(ii)(b),  
566  
567 12.22 A.34(f)(1).  
568 4. Dwelling Units subject to affordable housing covenants, and/or income-restrictions  
569 under City, State, or Federal law, and/or are subject to the City's Rent Stabilization  
570 Ordinance are not eligible to be used as Vacation Rentals. (Draft Ord. Section 2:  
571 12.22 A.34 (c)(ii)(2)(d)&(e).  
572 5. Accessory Dwelling Units are not eligible to be used for Vacation Rentals. (Draft  
573 Ord. Section 2: 12.22 A.34 (c)(2)(ii)(f)  
574 6. Vacation Rental permits may not be issued to buildings that have been removed  
575 from the rental market through the Ellis Act within seven years of the application  
576 submittal date. (Draft Ord. Section 2: 12.22 A.34 (c)(2)(ii)(h)

399

400 Vacation Rentals Ordinance PAGE 11  
City of Los Angeles

401 Initial Study December 2019

402

403

577

578

579

580

581

582

583 Vacation Rentals Ordinance PAGE 12  
City of Los Angeles

584 Initial Study June 2020

585

586

587 Caps on Number of Vacation Rentals  
and Rentals Nights

588

404

405 3.3 DESCRIPTION OF PROJECT

589 1. The total number of active Vacat  
ion Rental permits at any time in t  
he City is capped

590 at 14,740, which is approximately 1  
% of the City's total housing stock  
. (Draft Ord.

591 Section 2: 12.22 A.34 (c)(3)(i)

592 2. The total number of active  
Vacation Rental permits at any  
time is capped at 1% of

593 the total number of housing units w  
ithin each community plan area. Th  
e ordinance

594 contains numerical caps for each co  
mmunity plan area. (Draft Ord. Sect  
ion 2: 12.22

595 A.34 (c)(3)(ii))

596 3. In buildings with four or fewer  
units (Type 1) only one (1) unit ma  
y be permitted as a

597 Vacation Rental. (Draft Ord. Sectio  
n 2: 12.22 A.34 (b)(2) and (c)(4)(i  
)

598 4. Vacation Rentals in buildings  
with more than four units (Typ  
e 2) may have a

599 minimum of one (1) Vacation Rental.  
In Type 2 buildings, the maximum nu  
mber of

600 Vacation Rentals shall not exce  
ed 5 percent of the total num  
ber of units in the

601 building, or 10 units in total  
, whichever is less. (Draft  
Ord. Section 2: 12.22 A.34

602 (b)(2) and (c)(4)(i)

603 5. A Vacation Rental may be re  
nted for no more than 90 nigh  
ts per calendar year

406

407 3.3.1 Project Overview

408 The Project includes regulations to  
409 permit only a limited number of Vac  
410 ation Rentals to operate

409 in the City. In addition, Vacation  
410 Rentals permitted by the Project wo  
411 uld be subject to

410 regulations and operational standar  
411 ds. The Project includes the follow  
412 ing key provisions:

411

412 1. Vacation Rental permits may on  
413 ly be issued to owners of Dwelling  
414 Units. Renters and

413 lessees are not eligible to obtain  
414 a Vacation Rental permit, and only  
415 housing units that

414 meet the criteria of a Dwelling Uni  
415 t are eligible to be operated as a  
416 Vacation Rental.

415 2. Only Dwelling Units occupied o  
416 n an occasional or intermittent bas  
417 is by the owner are

416 eligible to be used as Vacation Ren  
417 tals. An owner of a dwelling unit w  
418 ho is applying for a

417 Vacation Rental permit must submit  
418 an affidavit, under the penalty of  
419 perjury, stating that

418 he or she occupies the unit intende  
419 d to be used as a Vacation Rental o  
420 n at least an

419 occasional annually.

420 3. Only one Vacation Rental at a  
421 time is allowed to be operated by a  
422 n individual or entity

421 4. Dwelling Units subject to affo  
422 rdable housing covenants, and/or in  
423 come-restrictions under

422 City, State, or Federal law, and/or

604 (Draft Ord. Section 2: 12.22 A.34(c)  
605 )(3)(iii))

605

606 Distancing Requirements for Vacatio  
607 n Rentals in Type 1 Buildings

607

608 1. A Vacation Rental in a Type 1 bu  
609 ilding is required to be at least 2  
610 50 feet away from

609 other Vacation Rentals in Type  
610 1 building on the same block  
611 face. (Draft Ord.

610 Section 2: 12.22. A.34(b)(2) and (c)  
611 )(4)(i)(b))

422 City, State, or Federal law, and/or  
are subject to the City's Rent Stab  
ilization Ordinance  
423 are not eligible to be used as Vaca  
tion Rentals  
424 5. Accessory Dwelling Units are n  
ot eligible to be used for Vacation  
Rentals  
6. Vacation Rental permits may no  
425 t be issued to buildings that have  
been removed from  
426 the rental market through the Ellis  
Act in the past seven years from th  
e application  
427 submittal date.  
428 7. The total number of active Vac  
ation Rental permits at any time is  
capped at 3,625,  
429 approximately 0.25 percent of the C  
ity's total housing stock  
430 8. The total number of active Vac  
ation Rental permits at any time wo  
uld be capped at 0.25  
431 percent of the total number of hous  
ing units within each Census Tract  
432 9. Vacation Rentals in buildings  
with four or fewer units (Type 1) a  
re required to be at least  
433 250 feet away from other Vacation R  
entals in Type 1 buildings  
434 10. Vacation Rentals in buildings w  
ith more than four units (Type 2) m  
ay not exceed 5  
435 percent of the total number of unit  
s in the building, or 10 units in t  
otal, whichever is less  
436 11. Vacation Rental units may not b  
e booked for more than 30 days in a  
calendar year

437  
438 In addition, the Project includes  
enforcement tools and resources, in  
cluding a requirement for  
439 the Owner of a Vacation Rental unit

611  
612 In addition, the Project  
includes enforcement tools and  
resources, including fines for  
both  
613 Vacation Rental permittees and

439 the owner of a vacation rental unit  
to pay a per-night fee for each night the  
Vacation Rental  
unit is rented. The revenue from which  
is required to be deposited into the Short Term  
Rental Enforcement Fund to enforce the provisions  
of this ordinance.

442

443

### 444 3.3.2 Analysis

445

446 Vacation Rentals are currently prohibited from  
operating in the City, and evidence from the early  
447 stages of enforcement of the Home-Sharing  
Ordinance shows great effectiveness at reducing  
448 the scope of short-term rentals from presumed  
pre-enforcement baseline levels. However, for  
449 the purposes of this analysis, the City assumes  
that there is still a baseline level of Vacation

450 Rental activity occurring illegally, and while the  
baseline is small, it is not zero. The intention of  
451 this Project is to allow some Vacation Rentals  
to legally operate, while eliminating those that

452 contribute to issues that are commonly associated  
with short-term rentals- namely, reducing

613 vacation rental permittees and hosting platforms  
for violating the provisions of the ordinance,  
and a requirement for the Vacation Rental  
permittee to pay a per-night fee for each night  
the

615 Vacation Rental unit is rented. The revenue  
from this fee is required to be deposited into  
the

616 Short Term Rental Enforcement Fund to enforce  
the provisions of this ordinance.

617

618

### 619 3.3.2 Analysis

620

621 Vacation Rentals are currently prohibited from  
operating in the City, and evidence from the early  
622 stages of enforcement of the Home-Sharing  
Ordinance shows a significant reduction in the  
623 number of short-term rental listings from  
estimated pre-enforcement baseline levels.  
624 However, based upon information received  
regarding the continued listing of Vacation  
Rentals in violation

625 of the HSO, for the purposes of this analysis,  
the City estimates a relatively small baseline  
level of Vacation Rental activity occurring  
626 illegally but not a baseline of zero  
Vacation Rental listings.

627 The policy goals of this Project is to allow  
certain Vacation Rentals to legally operate,  
628 while eliminating those that contribute to

to issues that are commonly associated with  
short-term rentals-

629 namely, reducing available long-term

453  
454  
455  
456  
457  
458  
459  
460  
461  
462  
463  
464

Vacation Rentals Ordinance PAGE 12  
City of Los Angeles  
Initial Study December 2019  
available long-term housing supply, changing the residential character of neighborhoods, and nuisance related issues. The proposed ordinance contains several provisions that establish limitations on the amount of and location where Vacation Rentals can operate, operational standards Vacation Rentals must comply with, and associated penalties for both owners of units

629  
630  
631  
632  
633  
634  
635  
636  
637  
638  
639  
640  
641  
642  
643  
644  
645  
646  
647  
648

namely, reducing available long-term rental housing supply, changing the residential character of neighborhoods, and nuisance related issues. As set forth above, the VRO contains several provisions that establish limitations on the amount of and location where Vacation Rentals can operate, operational standards Vacation Rentals must comply with, and associated penalties for both permittees and hosting platforms for violating the provisions of the ordinance. Cumulatively, these provisions serve to limit the impact Vacation Rentals will have on existing neighborhoods and the environment. While it is expected that the presence of Vacation Rentals will grow beyond the estimated current baseline, the overall number of units that will be allowed to be used as Vacation Rentals will not exceed 14,740 citywide, which is approximately equal to 1% of the City's total current housing stock. Furthermore, the proposed ordinance does not expressly authorize any new development, and it is reasonably anticipated that permitted Vacation Rentals will operate in existing structures, and little, if any, new development will occur

for both owners of units  
465 and hosting platforms for violating  
the provisions of the ordinance. Cu  
mulatively, these  
466 provisions serve to limit the impac  
t Vacation Rentals will have on  
existing neighborhoods and  
467 the environment. While it is expect  
ed that the presence of Vacation Re  
ntals will grow beyond

468 the limited presumed current baseli  
ne, the overall number of units tha  
t will be allowed to be  
469 used as Vacation Rentals will not e  
xceed 3,625, which is approximately  
equal to 0.25% of the  
470 City's total current housing stock.  
Furthermore, the Project does not a  
uthorize any new

471 development. Given the relatively s  
mall number of Vacation Rentals tha  
t will be permitted to  
472 operate within the entire City, the  
caps on the number allowed in each  
Census tract, and the  
473 other limitations and prohibitions  
contained in the Project, it is rea  
sonably anticipated that no

474 significant environmental impacts w  
ill be associated with this Project  
. An in-depth analysis of the

475 proposed regulations contained in t  
he ordinance follows below.

476

477 Owners of units intended to be used  
as Vacation Rentals must obtain a p  
ermit from the City in  
478 order to operate. The ordinance est  
ablishes procedures and requirement  
s for what prospective  
479 Vacation Rental owners must submit  
in order to apply for a Vacation Re  
ntal permit, including

any, new development will occur  
649 as a result of this ordinance.  
While the Vacation Rental Ordin  
ance could result in incidental  
650 development, there is no evidence t  
o indicate that resulting developme  
nt would be widespread  
651 or rise to a significant level  
. Given the relatively small numbe  
r of Vacation Rentals that  
will be

652 permitted to operate within the ent  
ire City, caps on the number allowe  
d in each community plan  
653 area, the limited number of day  
s a Vacation Rental may be re  
nted each year, and the other  
654 limitations and prohibitions  
contained in the Project, it is  
reasonably anticipated that no

655 significant environmental impacts w  
ill be associated with this Project  
. An in-depth analysis of the

656 proposed regulations contained in t  
he ordinance follows below.

657

658 Vacation Rental Permitting and Perm  
it Eligibility

659

660 As described in the above Proj  
ect Description section of this  
Initial Study, owners of units

480 documentation that verifies ownersh  
ip of the unit proposed for Vacatio  
n Rental, an affidavit,  
481 under the penalty of perjury, verif  
ying the occupancy of the unit by t  
he owner on an occasional  
482 or intermittent basis, a list of al  
l hosting platforms intended to be  
used to list the Vacation  
483 Rental, and more. Additionally, the  
ordinance stipulates that only owne  
rs of dwelling units are  
484 eligible to obtain a Vacation Renta  
l permit, meaning renters are not p  
ermitted to operate  
485 Vacation Rental units. These restri  
ctions, in essence, limit the poten  
tial housing units that can  
486 be used for Vacation Rentals to sec  
ond homes. Finally, an individual o  
r entity may only operate,  
487 or hold a valid permit for, one Vac  
ation Rental at a time, and Vacatio  
n Rentals may not be  
488 booked for more than 30 days in a c  
alendar year. However, neither the  
occasional or  
489 intermittent owner occupation nor t  
he limitation on the number of nigh  
ts a Vacation Rental may  
490 be operated in a calendar year are  
being relied upon for the purposes  
of this environmental  
491 analysis.

492  
493

Cumulatively, the eligibility restr  
ictions described above will greatl  
y limit the number of units that

661 intended to be used as Vacation Ren  
tals must obtain a permit from the  
City in order to operate.  
662 The ordinance establishes  
procedures and requirements for  
what prospective Vacation Rental  
663 permittees must submit in order to  
apply for a Vacation Rental permit,  
including documentation  
664 that verifies ownership of the unit  
proposed for Vacation Rental, an af  
fidavit, under the penalty  
665 of perjury, verifying the occup  
ancy of the unit by the owner  
on an occasional or intermitten  
t  
666 basis, a list of all hosting  
platforms intended to be used  
to list the Vacation Rental,  
and more.  
667 Additionally, the ordinance stip  
ulates that only owners of dwe  
lling units are eligible to ob  
tain a  
668 Vacation Rental permit, meaning  
renters are not permitted to op  
erate Vacation Rental units.  
669 These restrictions, in essence,  
limit the potential housing unit  
s that can be used for  
Vacation  
670 Rentals to second homes. Additional  
limitations on Vacation Rental perm  
itting include allowing  
671 Vacation Rental permittees to  
operate, or hold a valid permit for  
, only one Vacation Rental at a  
672 time, and prohibiting Vacation Ren  
tals from being booked for more than  
90 days in a calendar  
673 year.

674  
675

Cumulatively, the eligibility restr  
ictions described above will greatl  
y limit the number of units that

y limit the number of units that  
494 can be operated as Vacation Rentals  
. Specifically, the provision that  
any entity or individual may  
495 only operate one Vacation Rental at  
a time is intended to prevent large  
clusters of units in multi-  
496 family buildings from being operate  
d as Vacation Rental units, as buil  
ding owners would only be  
497 allowed to obtain one permit for th  
e whole building. While there is po  
tential for people to find a  
498 way around this provision by creati  
ng separate ownership structures fo  
r portions of buildings,  
499 the Project establishes fines that  
may be levied against hosting  
platforms and owners in order to  
500 discourage them from attempting to  
circumvent this restriction on perm  
it eligibility. These fines  
501 include a \$1,000 per day fine that  
can be levied against hosting platf  
orms that complete booking  
502 service transactions for listings w  
here more than one Vacation Rental  
property is affiliated with a  
503 single owner, and a \$500 daily fine  
that may be levied against Vacation  
Rental owners for the  
504 same violation. Furthermore, the Pr  
oject contains additional regulatio  
ns that reinforce the intent  
505 of restricting permit eligibility,  
which is, ultimately, to limit the  
number of Vacation Rentals  
506 allowed to operate citywide, at the  
neighborhood level, and at the indi  
vidual building level. Given  
507 these additional restrictions, whic  
h will be discussed in detail below  
, the potential for significant  
508 levels of abuse or circumvention of

y limit the number of units that  
676 can be operated as Vacation Rentals  
. Specifically, the provision that  
any entity or individual may  
677 only operate one Vacation Rental at  
a time is intended to prevent large  
clusters of units in multi-  
678 family buildings from being operate  
d as Vacation Rental units, as buil  
ding owners would only be  
679 allowed to obtain one permit f  
or the whole building. Additiona  
l restrictions, such as the cap  
s  
680 established for Type 2 buildings, h  
elp to ensure that clusters of unit  
s in condominium buildings  
681 also do not become oversaturated wi  
th Vacation Rentals. While there i  
s potential for individuals  
682 to circumvent the provision that  
limits each qualifying individua  
l or entity to a maximum of one  
683 Vacation Rental permit by creati  
ng separate ownership structures  
for portions of multi-unit  
684 buildings, the Project establishes  
fines that may be levied again  
st hosting platforms and  
685 permittees in order to discourag  
e them from attempting to circum  
vent this restriction on permit  
686 eligibility. These fines include a  
\$1,000 per day fine that can be lev  
ied against hosting platforms  
687 that complete booking service  
transactions for listings where  
more than one Vacation Rental  
688 property is affiliated with a  
single permittee, and a \$500 da  
ily fine that may be levied  
against  
689 Vacation Rental permittees for the  
same violation. Furthermore, the Pr  
oject contains additional  
690 regulations that reinforce the inte

508 levels of abuse or circumvention of individual provisions of this Project is negligible due to the  
509 redundancy and layered approach the ordinance takes to regulate Vacation Rentals.  
510

511  
512  
513  
514  
515 Vacation Rentals Ordinance PAGE 13  
City of Los Angeles  
516 Initial Study December 2019

517  
518  
519 In addition to permit eligibility restrictions, the Project contains a series of prohibitions on the  
520 types of buildings that may be used for Vacation Rentals. The Project stipulates that units  
521 subject to the City's Rent Stabilization Ordinance, a segment of the housing market that  
522 represents approximately 45% of the City's total housing stock, as well as those subject to  
523 affordable housing covenants, and/or income restrictions pursuant to C

690 regulations that reinforce the intent of restricting permit eligibility, which is, ultimately, to limit the  
691 number of Vacation Rentals allowed to operate citywide, at the neighborhood level, and at the  
692 individual building level. Given these additional restrictions, which will be discussed in detail  
693 below, the potential for significant levels of abuse or circumvention of individual provisions of

694  
695  
696  
697  
698 Vacation Rentals Ordinance PAGE 14  
City of Los Angeles  
699 Initial Study June 2020  
700  
701  
702 this Project is negligible due to the redundancy and layered approach the ordinance takes to  
703 regulate Vacation Rentals.

704  
705 Prohibited Types of Housing  
706  
707 In addition to permit eligibility restrictions, the Project contains a series of prohibitions on the  
708 types of buildings that may be used for Vacation Rentals. The Project stipulates that units  
709 subject to the City's Rent Stabilization Ordinance, a segment of the housing market that  
710 represents approximately 45% of the City's total housing stock, as well as those subject to  
711 affordable housing covenants, and/or income restrictions pursuant to C

Income restrictions pursuant to City, State, or Federal law

524 are not eligible to be used for Vacation Rentals. Accessory Dwelling Units (ADUs) and buildings

525 removed from the rental market via the Ellis Act in the past seven years from the Vacation

526 Rental permit application submittal date are also prohibited to be used for Vacation Rentals. By

527 prohibiting RSO, income restricted, and covenanted housing from being used as Vacation

528 Rentals, the City is protecting some of its most vulnerable residents, and ensuring that housing

529 for these populations will continue to be used for long-term housing and not Vacation Rentals.

530 Displacement of existing residents is not reasonably anticipated as a result of this Project, and

531 therefore, one cannot reasonably anticipate new construction occurring to house affected

532 residents. Additionally, by prohibiting ADUs and buildings that have been removed from the

533 rental market via the Ellis Act within the past 7 years from being used for Vacation Rentals, the

534 City can reasonably conclude that no new environmental impacts related to the construction of

535 ADUs or the conversion of buildings from rental housing to other uses will occur as a result of

536 this Project.

537

Income restrictions pursuant to City, State, or Federal law

712 are not eligible to be used for Vacation Rentals. Accessory Dwelling Units (ADUs) and buildings

713 removed from the rental market via the Ellis Act in the past seven years from the Vacation

714 Rental permit application submittal date are also prohibited to be used for Vacation Rentals. By

715 prohibiting RSO, income restricted, and covenanted housing from being used as Vacation

716 Rentals, the City is protecting some of its most vulnerable residents, ensuring that housing for

717 these populations will continue to be used for long-term housing and not Vacation Rentals, and

718 thus limiting displacement. Due to these restrictions, as well as other provisions of the proposed

719 ordinance, displacement of existing residents is not reasonably anticipated as a result of this

720 Project, and therefore, one cannot reasonably anticipate new construction occurring to house

721 affected residents. Additionally, by prohibiting ADUs and buildings that have been removed from

722 the rental market via the Ellis Act within the past 7 years from being used for Vacation Rentals,

723 the City can reasonably conclude that no new environmental impacts related to the construction

724 of ADUs or the conversion of buildings from rental housing to other uses

will occur as a result of

725 this Project.

726

538 While restrictions on eligibility and prohibitions on the types of housing units that may be used for Vacation Rentals both serve to limit the environmental effects of allowing Vacation Rentals to operate in the City, the most impactful provision of the proposed ordinance for regulating the scope of Vacation Rentals and their concentrations are the caps and distancing requirements contained in the ordinance. The proposed ordinance establishes a citywide cap on the number of active Vacation Rental permits that may exist at any given time. That cap has been set at 3,625 units, which is roughly equal to 0.25% of the City's total housing stock. The citywide cap is an important tool for understanding potential impacts of the ordinance, because it presents a clear figure on the absolute maximum number of units that may be affected by the ordinance. When viewed in the context of the whole City and its approximately 1.45 million housing units, the cap of 3,625 permits is minimal, and its presumed impact is also reasonably expected to be less than significant. While the amount of Vacation Rental units is expected to rise from the extremely low presumed baseline, the total number that will be allowed is low enough that one can reasonably assume that no signi-

727 Concentration Limitations

728

729 While restrictions on eligibility and prohibitions on the types of housing units that may be used for Vacation Rentals both serve to limit the environmental effects of allowing Vacation Rentals to operate in the City, the most impactful provisions of the proposed ordinance for regulating the scope of Vacation Rentals and their concentrations are the caps and distancing requirements. The proposed ordinance establishes a citywide cap on the number of active Vacation Rental permits that may exist at any given time. That cap has been set at 14,740 units, which is roughly equal to 1% of the City's total housing stock. The citywide cap of 14,740 is static, meaning it will not increase as more housing is constructed in the City unless the City adopts a later amendment to the VRO to increase the numerical cap. As a result, while the current proposed cap is representative of approximately 1% of the overall housing stock in the City, the percentage is expected to decrease in the future as more housing is added to the City's stock. Furthermore, according to Department of City Planning data, almost 14,000 dwelling units were built in 2018, meaning the total number of dwelling units permitted to be used as Vacation Rentals is comparable to the number

551 can reasonably assume that no significant impacts will arise.

552

553 In addition to the citywide cap on the number of active Vacation Rental permits, the Project also  
554 contains provisions aimed at preventing an overconcentration of Vacation Rental units in any  
555 neighborhood or portion thereof. As previously discussed in the “Existing Conditions” section of  
556 this study, data provided by Host C

742 Rentals is comparable to the number of units produced in just one year.  
743  
744 The citywide cap establishes an absolute maximum number of units that may be affected by the  
745 ordinance. When viewed in the context of the whole City and its approximately 1.45 million  
746 housing units, the cap of 14,740 permits is small and, unless the VR  
747 Ordinance is amended to increase the numerical cap, it will represent an ever smaller percentage of the  
748 total housing units in the City as more housing is built over time. While the amount of Vacation Rental units is expected to  
749 rise from the low presumed current baseline, the total number that will be allowed is low enough  
750 that one can reasonably assume that no significant impacts will arise.  
751  
752

753  
754  
755  
756 Vacation Rentals Ordinance PAGE 15  
757 City of Los Angeles  
758 Initial Study June 2020  
759

760 In addition to the citywide cap on the number of active Vacation Rental permits, the Project also  
761 contains provisions aimed at preventing an overconcentration of Vacation Rental units in any  
762 neighborhood or portion thereof. As previously discussed in the “Existing Conditions” section of  
763 this study, data provided by Host C

550 this study, data provided by most c  
ompliance, AirBnB, VRBO, and Keep N  
eighborhoods First all  
557 shows that short-term rental activi  
ty is most concentrated in a few ne  
ighborhoods.  
558 Neighborhoods such as Venice, Silve  
r Lake, Echo Park, Hollywood, and D  
owntown show some  
559 of the greatest concentrations of s  
hort-term rentals in the City. In o  
rder to prevent most of the  
560 3,625 permits allowed under the cit  
ywide cap from being clustered in t  
hese neighborhoods, or  
561 other parts of the City that may be  
come popular tourist destinations i  
n the future, the Project  
562 contains caps on the percent of hou  
sing units that may be used for Vac  
ation Rentals in every  
563 Census tract in the City. Under the  
proposed ordinance, no more than 0.  
25% of the total amount  
564 of housing units in any Census trac  
t may be used for Vacation Rentals.  
Compliance with this  
565 provision of the ordinance will be  
checked at the time of permit appli  
cation.

566  
567 The citywide cap and Census tract c  
aps serve to keep Vacation Rental n  
umbers predictably  
568 low, and to limit the concentration  
of Vacation Rental units at the nei  
ghborhood level. However,

763 this study, data provided by most c  
ompliance, AirBnB, VRBO, and Keep N  
eighborhoods First all  
764 shows that short-term rental ac  
tivity is most concentrated in  
a few neighborhoods. These  
765 neighborhoods include Venice, loca  
ted within the Venice Community  
Plan, Silver Lake and  
766 Echo Park, located within the Si  
lver Lake– Echo Park– Elysian Val  
ley Community Plan,  
767 Hollywood, located within the Ho  
llywood Community Plan, and Dow  
ntown, located within the  
768 Central City and Central City  
North Community Plans. To preven  
t most of the 14,740 permits  
769 allowed under the citywide cap from  
being concentrated in these neighbo  
rhoods, or other parts  
770 of the City that may become pop  
ular tourist destinations in  
the future, the Project contains  
771 numerical caps on the amount of hou  
sing units that may be used for Vac  
ation Rentals in every  
772 community plan area in the City. |  
Under the proposed ordinance, |  
no more than 1% of the total  
773 amount of housing units in any  
community plan area may be used  
for Vacation Rentals.

774 Compliance with this provision of t  
he ordinance will be checked at the  
time of permit application.

775  
776 Table 1 below shows the total n  
umber of dwelling units in eac  
h community plan area, and,  
777 consequently, the total number of p  
ermits that would be allowed in eac  
h plan area. By breaking  
778 up the citywide cap into these

778 up the Citywide cap into these  
 smaller geographies, the Project  
 ensures that no portion of the  
 779 city is unduly burdened with more V  
 acation Rentals than another. Witho  
 ut the geographic caps  
 780 by community plan area, it is likel  
 y that Vacation Rental activity wou  
 ld cluster in neighborhoods  
 781 like Venice, Hollywood, and Sil  
 ver Lake. While 14,740 permits i  
 s a fairly small number when  
 782 viewed in the context of the  
 entire City, a large percentage  
 of those permits clustering in  
 any  
 783 particular neighborhood could inc  
 rease the potential for certain  
 environmental impacts. The  
 784 geographic caps serve to greatly mi  
 nimize the potential for this clust  
 ering to occur, and further  
 785 measures are contained in the  
 Project to ensure that clusteri  
 ng does not occur at even mor  
 e  
 786 localized levels, such as individua  
 l streets, blocks, and buildings.

787  
 788 Table 1: Community Plan Area Vacati  
 on Rental Permit Caps

789 Community Plan Area	Total	Number
790 Dwelling Units		of
791 (2018)		
792 Maximum Number of Vacation Rental		
793 Permits		
794 Arleta	–	Pacoima 23,633 236
795 Bel Air	–	Beverly Crest 9,039 90
796 Boyle Heights	24,186	242
797 Brentwood	–	Pacific Palisades 27,214 272
798 Canoga Park	–	Winnetka
		Woodland Hills

WOODLAND HILLS

69,158 692

799 Central City 28,798 288

800 Central City North 8,078 81

801 Chatsworth - Porter

Ranch 36,425 364

802 Encino - Tarzana 32,332 323

803 Granada Hills - Knollwood

21,297 213

804

805

806

807

Vacation Rentals Ordinance PAGE 16

808 City of Los Angeles

809 Initial Study June 2020

810

811

812 Harbor - Gateway 13,327 133

813 Hollywood 107,095 1,071

814 LAX 589 6

815 Mission Hills - Panorama

City - North Hills

41,232 412

816 North Hollywood -

Valley Village 58,690 587

817 Northeast Los Angeles 80,

500 805

818 Northridge 24,089 241

819 Palms - Mar Vista -

Del Rey 54,469 544

820 Port of Los Angeles 32

1

821 Reseda - West Van

Nuys 37,191 372

822 San Pedro 32,706 327

823 Sherman Oaks - Studio

City - Toluca Lake -

Cahuenga

824 Pass

825

43,380 434

826 Silver Lake - Echo

Park - Elvian Valley

569

570

	Park		Elysian Valley		
	30,623	306			
827	South Los Angeles		86,686		867
828	Southeast Los Angeles	73,190			
		732			
829	Sun Valley	-		La	
	Tuna Canyon	24,577			246
830	Sunland Lake Shadow	-	Tujunga Terrace	-	
					-
831	Hills Tuna Canyon	-	East La		
832		22,387			224
833	Sylmar	22,294			223
834	Van Nuys Sherman Oaks	-		North	
			62,946		629
835	Venice	21,139			211
836	West Adams Hills	-		Baldwin Hills	
				Leimert Park	
		70,754			708
837	West Los Angeles		38,929		389
838	Westchester Rey	-		Playa Del Rey	
		27,575			276
839	Westlake		43,530		435
840	Westwood		21,490		215
841	Wilmington City	-		Harbor	
		23,926			239
842	Wilshire		130,635		1,306
843	Total	1,474,141			14,740

844 Table 1: List of Dwelling Units per Community Plan Area and Number of Vacation Rental Permits

845 Available. Data source: 2018 American Community Survey estimates

846

847

848

849

850 Vacation Rentals Ordinance PAGE 17  
City of Los Angeles

851 Initial Study June 2020

852

853

854 The citywide cap and community p

571

854 The Citywide Cap and Community Plan area caps serve to keep Vacation Rental numbers  
855 predictably low, and to limit the concentration of Vacation Rental units at the neighborhood  
856 level. However, there are also provisions included in the Project that serve to limit the  
857 concentration of Vacation Rental units at the individual building and block levels. Acknowledging  
858 the differences between large multi-family buildings and smaller, house-scale buildings, the  
859 Project creates different distancing requirements and caps for each. For buildings with four  
860 or fewer units, including single-family residences, referred to as Type 1 buildings in the ordinance,  
861 a maximum of one unit may be used as a Vacation Rental. Additionally, Vacation Rental units in  
862 Type 1 buildings must be at least 250 feet away from other Vacation Rental units in Type 1  
863 buildings on the same block face. This provision effectively limits the number of Vacation  
864 Rentals that may operate on any particular block, and thus serves to protect the residential  
865 character of these low-scale neighborhoods. To illustrate the distancing requirements for Type 1  
866 buildings, a sample diagram has been included below. For the purposes of this example,  
867 assume that no conditions are present that would otherwise re

present that would otherwise re-  
nder properties ineligible from  
868 obtaining Vacation Rental permit  
s. If the property identified in  
n blue (Type 1 building) holds  
a  
869 valid Vacation Rental permit, n  
o other Vacation Rentals would  
be allowed to operate on this  
870 block face. Properties on the left  
side of the image, shown in orange,  
would be eligible to have a  
871 Vacation Rental even if the require  
d 250 feet of separation was n  
ot met, because they front a  
872 different street, and are not part  
of the same block face.

572

573 Vacation Rentals Ordinance PAGE 14  
City of Los Angeles

574 Initial Study December 2019

575

576

577 there are also provisions included  
in the Project that serve to limit  
the concentration of Vacation  
578 Rental units at the individual buil  
ding and block levels. Acknowledgin  
g the differences between  
579 large multi-family buildings and sm  
aller, house-scale buildings, the P  
roject creates different  
580 distancing requirements and caps fo  
r each. For buildings with four or  
fewer units, referred to as  
581 Type 1 buildings in the ordinance,  
a maximum of one unit may be used a  
s a Vacation Rental.  
582 Additionally, Vacation Rental units  
in Type 1 buildings must be at leas  
t 250 feet away from other

583

Vacation Rental units in Type 1 bui  
ldings. This provision effectively  
limits the number of

873

874

875

limits the number of  
584 Vacation Rentals that may operate o  
n any particular block, and thus se  
rves to protect the  
585 residential character of these low-  
scale neighborhoods.

586  
587 For residential buildings containin  
g more than four units, referred to  
as Type 2 buildings in the  
588 ordinance, no more than 5% of the t  
otal units in the building, or a ma  
ximum of 10 units in total,  
589 whichever is less, may be used as V  
acation Rentals. If the calculation  
of the number of units

590 that can be used for Vacation Renta  
ls results in a number that is less  
than one, a Vacation

591 Rental permit may be obtained for o  
ne unit in the building. This provi  
sion has been included in

592 the Project to limit the number of  
units in any building from being co  
nverted to or built out as

593 Vacation Rentals. It is important t  
o note that only owners of units ar  
e permitted to obtain

594 Vacation Rental permits, so these c  
aps on the number of units allowed  
in Type 2 buildings

595 primarily affect owner occupied  
(condominium) buildings, and not ap  
artment buildings, which

596 would only have one unit that would  
be potentially eligible to be used  
as a Vacation Rental,

597 given the restriction on eligibilit  
y to owners of dwelling units.

598  
599 When viewed cumulatively, the city

876  
877 For residential buildings containin  
g more than four units, referred to  
as Type 2 buildings in the

878 ordinance, no more than 5 percent  
of the total units in the building,  
or a maximum of 10 units in  
879 total, whichever is less, may  
be used as Vacation Rentals. If  
the calculation of the number  
of

880 units that can be used for Vacation  
Rentals results in a number that is  
less than one, a Vacation

881 Rental permit may be obtained for o  
ne unit in the building. This provi  
sion has been included in

882 the Project to limit the number  
of units in any building from  
being converted to or built  
out as

883 Vacation Rentals. It is  
important to note that only ow  
ners of units are permitted to  
obtain

884 Vacation Rental permits, so the  
se caps on the number of unit  
s allowed in Type 2 buildings

885 primarily affect owner occupied  
(condominium) buildings, and not  
apartment buildings, which

886 would only have one unit that  
would be potentially eligible t  
o be used as a Vacation  
Rental,

887 given the restriction on eligibilit  
y to owners of dwelling units.

888  
889 When viewed cumulatively, the city

599 when viewed cumulatively, the citywide and Census tract caps significantly restrict the total number and the locations where Vacation Rentals may operate. The effects of the citywide and Census tract caps are fairly evident in that they simply limit the number of Vacation Rentals allowed to operate and their general geographic locations. Distancing requirements and building caps address concentration of Vacation Rentals in a more fine-grained manner. To analyze the impacts of the building caps and distancing requirements, it is useful to evaluate the effect these provisions could have in a neighborhood. By limiting the number of Vacation Rentals that may operate in a Type 1 building to one, and requiring 250 feet of separation between Vacation Rentals in Type 1 buildings, the Project will restrict the number of Vacation Rentals that are allowed to operate in lower density neighborhoods. Given that the typical lot width in the City is 50 feet, the closest a Vacation Rental in a Type 1 building could be to another Vacation Rental in a Type 1 building would be roughly five buildings away. While block sizes in Los Angeles exhibit high degrees of variability, 500 feet can be assumed for the purposes of this example. In this hypothetical neighborhood of Type 1 buildings, a maximum of two Vacation Rentals could operate on one side of the block. Given that distancing requirements are measured radially,

609 when viewed cumulatively, the citywide and community plan area caps significantly restrict the total number and the locations where Vacation Rentals may operate. The effects of the citywide and community plan area caps are fairly evident in that they simply limit the number of Vacation Rentals allowed to operate and their general geographic locations. However, the proposed ordinance's distancing requirements and building caps address concentration of Vacation Rentals in a more fine-grained manner. To analyze the impacts of the building caps and

899 Vacation Rentals Ordinance PAGE 18  
City of Los Angeles  
900 Initial Study June 2020

903 distancing requirements, it is useful to evaluate the effect these provisions could have in a

614 portions of the block on the other  
615 side of the street would also fall  
616 within the required buffer zone  
617 from Vacation Rentals, leaving larg  
618 e portions of the other side of the  
street also ineligible to be  
used for Vacation Rentals. The tota  
l maximum number of Vacation Rental  
s that could operate  
on this hypothetical block would be  
between three and four, assuming al  
l other requirements are  
met.

904 these provisions could have in the  
neighborhoods.  
905  
906 Demonstration of Project Provisions  
907  
908 The following portion of this  
Initial Study will examine a bl  
ock each in Venice Beach and  
909 Hollywood, neighborhoods with so  
me of the highest known concentr  
ations of short-term rental  
910 activity in the City, to show  
how the provisions of this ord  
inance limit the concentration  
of  
911 Vacation Rentals in neighborhood  
s exhibiting different densities  
and built characteristics. For  
912 the purposes of this analysis,  
it is assumed that all housing  
units are owner occupied, as o  
nly  
913 owners of dwelling units are e  
ligible to receive Vacation Rent  
al permits. Income restricted  
914 properties noted in the below  
examples are also for demonstra  
tive purposes, in order to show  
915 how the provisions of the Project w  
ork together to limit the concentra  
tion of Vacation Rentals.  
916  
917 Venice Beach  
918

620 In neighborhoods characterized by larger multi-family (Type 2) buildings, building caps also present significant limitations on the number of Vacation Rentals that may be permitted to operate. Since only owners of dwelling units are eligible to obtain Vacation Rental permits, apartment buildings, no matter their size, may not have more than one Vacation Rental operating in them since each owner is only eligible to possess one valid Vacation Rental permit at any time. In an owner-occupied multi-family (condominium) building of 100 units, a maximum of five units (5%) would be able to be used as Vacation Rentals due to the Type 2 building cap.

920 The above image is a block of Ruth Avenue in Venice Beach. Vacation Rentals would not be permitted to locate in lots marked with a red X, because units on these lots are subject to the Rent Stabilization Ordinance (RSO). Lot 225, second from the left in the above image, is a single family residence, and is not covenanted with City, State, or Federal income restrictions. Thus, a Vacation Rental would be allowed to locate on this property. This property has been marked with a green 0 to indicate this. Assuming the owner of this property obtained a Vacation Rental permit, and they were the first owners on the block face to do so, there is now a required 250 feet of separation (shown with red arrows) from the property lines of this property. Since distancing requirements only apply per block face and lot 226, immediately to the left of lot 225, is the last lot on this block face, the required separation would only reach to the left lot line of lot 226. The 250 feet of separation to the right of the Vacation Rental on lot 225 would render lots 224, 223, 222, 221, and 220 all unable to have Vacation Rentals. Lot 219 is also developed with a single family residence, however, this housing unit has been covenanted as affordable (indicated with a blue X). Even though this pr

property is outside of the  
934 required separation from lot 22  
5, and is not an RSO unit, th  
e VRO prohibits its use as a  
935 Vacation Rental.

936  
937 Lot 216, also developed with a  
single family residence, is not  
an RSO unit, has no income  
938 restrictions, and is outside of  
a required buffer from the Vac  
ation Rental on lot 225, so a  
939 Vacation Rental would be  
allowed to operate on this lot.  
This property has an Accessory  
940 Dwelling Unit located in the yard b  
ehind the primary residence on the  
site. While the ADU on the

941 property does not preclude a Vacati  
on Rental from operating in the pri  
mary home, the ADU may

942 not be operated as a Vacation Renta  
l, per the provisions of the propos  
ed ordinance. A yellow X

943 has been placed over the ADU  
on this lot to indicate that  
it may not operate as a Vacati  
on

944

945

946

947

948 Vacation Rentals Ordinance PAGE 19  
City of Los Angeles

949 Initial Study June 2020

950

951

952 Rental. The presence of a Vacation  
Rental in the primary home on lot 2  
16 requires 250 feet of

953 separation, which renders lots 2  
17-221 to the left of lot 216,  
and also lots 215 and 214 to  
the

627

628

954 right of it unavailable to hous  
e Vacation Rentals. The presenc  
e of RSO units in lots 215 a  
nd  
955 214, and the required buffer f  
rom the Vacation Rental on lot  
225 already rendered these lots  
956 unavailable to host Vacation Re  
ntals. Similarly, lots 220 and  
221 are within the required  
957 separation area of two Vacation  
Rentals- lots 225 and 216. The  
redundancy of control  
958 mechanisms presented in this  
example highlights multi-layered  
approach this proposed  
ordinance takes to limiting the con  
959 centration of Vacation Rentals.

960  
961 Hollywood

629

630

631 Vacation Rentals Ordinance PAGE 15  
City of Los Angeles

632 Initial Study December 2019

964  
965 The above image is a block of  
Cherokee Avenue in Hollywood. Th  
ere is a mix of multi-family  
966 and single family residences on  
this block. Like the example fr  
om Venice above, buildings  
967 subject to the provisions of the Re  
nt Stabilization Ordinance have bee  
n identified with a red X,  
968 ADUs have been identified with  
a yellow X, and properties wit  
h income restricted covenants  
969 have been identified with a blu  
e X. Vacation Rentals have been  
prohibited from operating in  
970 these types of properties. This  
example from Hollywood introduce  
s another building type in  
971 which Vacation Rentals are prohibit  
ed from operating those that have

ed from operating— those that have been taken off the rental

972 market via the Ellis Act in t  
he past seven years, shown on  
the above image with a purple  
X.

973 Given the presence of these propert  
ies that are prohibited from housin  
g Vacation Rentals, there  
974 are limited sites available in this  
sample block for Vacation Rentals t  
o operate.

975

976

977

978

979 Vacation Rentals Ordinance PAGE 20  
City of Los Angeles

980 Initial Study June 2020

981

982

983

984 If the owner of the single fami  
ly residence on lot 88 obtains  
a Vacation Rental permit, the

985 required 250 feet of separation, ag  
ain shown in red arrows, would rend  
er lots 89 and 90 above,

986 and lots 83-87 below, unavailable f  
or Vacation Rentals. Since the sepa  
ration requirement from

987 Vacation Rentals operating in T  
ype 1 buildings only applies p  
er block face, lots immediately

988 across the street would not be  
precluded from having Vacation  
Rentals locate there. For the

989 purposes of this analysis, assu  
me that the owner of the single  
family residence on lot 96 als  
o

990 obtains a permit for a Vacation Ren  
tal. Going down the block, the next  
available lot on which a

991 Vacation Rental could locate is

633

991 vacation rental could locate wo  
uld be lot 102, also developed  
with a single family residence.

992 Distancing requirements from lot 10  
2 would render the rest of the lots  
on this block unavailable

993 to Vacation Rentals, leaving just t  
hree sites on this block where Vaca  
tion Rentals can operate.

994

995 In both of the examples analyzed ab  
ove, the proposed ordinance will li  
mit the concentration of

996 Vacation Rentals by restricting the  
types of buildings where Vacation R  
entals may operate, and

997 by requiring 250 feet of separation  
between Vacation Rentals operating  
in Type 1 buildings. In

998 addition to these concentration  
limitations, a cap has been es  
tablished on the number of

999 Vacation Rentals that are allowed t  
o operate in Type 2 buildings, or b  
uildings containing more

1000 than four units.

1001

634

635 If a Type 1 building was to be loca  
ted immediately adjacent to this Ty  
pe 2 building, an owner

636 would be able to apply for a permit  
for a Vacation Rental, as the Type  
1 building distancing

637 requirements only affect distancing  
from other Type 1 buildings.  
Restrictions on the number of

638 Vacation Rental permits available  
citywide and in each Census tract,  
as well as building caps

639

and distancing requirements, combin  
e to significantly restrict the por  
tions of neighborhoods

1002 In neighborhoods characterized by l  
arger multi-family (Type 2) buildin  
gs, building caps limit the

1003 number of Vacation Rentals that  
may be permitted to operate. S  
ince only owners of dwelling

1004 units are eligible to obtain Vac  
ation Rental permits, apartment  
buildings, no matter their size

1005 may not have more than one Va  
cation Rental operating in them  
since each owner is only

1006 eligible to possess one valid Vacat  
ion Rental permit at any time. In a  
condominium building of

640 where Vacation Rentals can operate,  
and thus keep the concentration of  
Vacation Rental  
641 activity low across the City, as we  
ll as in individual neighborhoods,  
blocks, and buildings.

1007 100 units, where each unit is occup  
ied by its owner, a maximum of five  
units (5 percent) would  
1008 be able to be used as Vacation Rent  
als due to the Type 2 building cap.  
If a Type 1 building was  
1009 to be located immediately adjacent  
to this Type 2 building, an owner w  
ould be able to apply for  
1010 a permit for a Vacation Rental  
, as the Type 1 building distan  
cing requirements only affect  
1011 distancing from other Type 1 bu  
ildings. Restrictions on the  
number of Vacation Rental permi  
ts  
1012 available citywide and in each  
community plan area, as well a  
s building caps and distancing  
1013 requirements, combine to significa  
ntly restrict the portions of n  
neighborhoods where Vacation  
1014 Rentals can operate, and thus keep  
the concentration of Vacation Renta  
l activity low across the  
1015 City, as well as in individual nei  
ghorhoods, blocks, and buildings.

1016  
1017 Operational Standards

642  
643 To address potential nuisance issue  
s that could arise from the presenc  
e of Vacation Rentals in  
644 residential neighborhoods, the prop  
osed ordinance contains a list of g  
eneral standards Vacation  
645 Rental owners must enforce. Include  
d in these standards are prohibitio  
ns on sound amplifying  
646 equipment after 10:00 PM, outdoor c  
ongregations of more than eight peo  
ple, and using the  
647 Vacation Rental unit for nonresiden  
tial uses including the sale of pro

1018  
1019 To address potential nuisance issue  
s that could arise from the presenc  
e of Vacation Rentals in  
1020 residential neighborhoods, the prop  
osed ordinance contains a list of g  
eneral standards Vacation  
1021 Rental permittees must enforce. I  
ncluded in these standards are  
prohibitions on sound  
1022 amplifying equipment after 10:00  
PM, outdoor congregations of mo  
re than eight people, and  
1023 using the Vacation Rental unit for  
nonresidential uses including the s

that uses including the sale of products or hosting events. No more than two overnight guests are allowed per habitable room, and only one listing may be booked at any given time. Additionally, the ordinance establishes a series of fines that can be levied against both Vacation Rental owners and hosting platforms for violating the provisions of this ordinance, as well as a process for the suspension and revocation of Vacation Rental permits. These regulations and penalties for violating them help to ensure that typical nuisance issues, many of which are already regulated by the Los Angeles Municipal Code, will be kept to a minimum, and that impacts on issues such as noise and traffic will be kept to less than significant levels. Given the early success of enforcement of the Home Sharing Ordinance, one can reasonably assume that enforcement of the Vacation Rentals ordinance will be similarly effective at monitoring issues and eliminating owners who deviate from the standards and regulations contained in the proposed ordinance.

The citywide, Census tract, and building level caps, as well as the distancing requirements for Type 1 buildings all serve to limit the concentration of Vacation Rental units at the citywide, neighborhood, block, and building levels. When viewed in conjunction with the other provisions

non-residential uses including the sale of products or hosting events. No more than two overnight guests are allowed per habitable room, and only one listing may be booked at any given time. Additionally, in an effort to prevent unlicensed Vacation Rentals from operating and to encourage compliance with the provisions of the proposed ordinance, Vacation Rental permittees are prohibited from advertising units that do not clearly list the permit number for the unit. Vacation Rental permittees are also only allowed to advertise their units on hosting platforms that are listed in the permit applications for the Vacation Rentals. While operational standards help to minimize nuisance issues that could occur in residential areas as a result of Vacation Rental activity, it is important to note that it is anticipated that virtually all Vacation Rentals will operate out of existing dwellings, and occupancy levels are not

Vacation Rentals Ordinance PAGE 21  
City of Los Angeles

in the eligibility requirements for obtaining a Vacation Rental permit, operational standards, and the prohibitions on the types of buildings that are permitted to be used for Vacation Rentals, it is clear that Project utilizes multiple measures to limit the scope and impact of the proposed ordinance on the environment and the City's housing stock. Enforcement of these provisions will largely utilize the framework that was established to enforce the Home Sharing ordinance, and additional money will be deposited into the Short Term Rental Enforcement Fund to expand enforcement efforts to cover Vacation Rentals.

Below, in Section 4 of this document, is a discussion of potential impacts under each environmental factor. In most cases, the environmental factors are not impacted at all. In the few cases where there may be a potential impact, it has been determined to be less than significant. As a result, the Initial Study finds no potential significant impacts, and a Negative Declaration will be prepared.

Initial Study June 2020

expected to change. As such, Vacation Rentals will operate similarly to neighboring long-term residences, and are not expected to generate nuisance issues. If a Vacation Rental does become a source of nuisance issues, there are clear standards that can be cited, penalties may be levied against both the permittee and the Hosting Platform, and the Vacation Rental permit could be suspended or revoked.

The proposed ordinance establishes that Vacation Rental permittees are responsible for any nuisance violations that occur in the units. Permittees are responsible for paying inspection fees for each time a site inspection has to occur due to a nuisance violation being reported on the property. All of the general standards described above, as well as the delineation of responsibility for nuisance infractions, serve to promote responsible operation of Vacation Rentals. By attempting to proactively control for issues of noise and overcrowding of units, the

676

677

1053 overcrowding of units, the  
proposed ordinance takes steps to help ensure that Vacation Rentals are largely  
1054 indistinguishable from their residential neighbors, and preserve the character of residential  
1055 neighborhoods.

1056

1057 Enforcement

1058

1059 While the provisions contained in the proposed ordinance collectively serve to limit the impact  
1060 that Vacation Rentals will have on the City's housing stock and preserve the residential  
1061 character of its neighborhoods, enforcement of these provisions will ultimately determine the  
1062 impact this proposed ordinance will have. The Administrative Citation Enforcement (ACE)  
1063 program will be used to issue administrative citations and impose fines. Both hosting platforms  
1064 and Vacation Rental permittees may be fined for participating in activity that violates the  
1065 provisions of this ordinance, including but not limited to booking unpermitted Vacation Rentals or  
1066 those that have had their permits suspended or revoked, exceeding the 90 day limit for Vacation  
1067 Rental operation in one calendar year, and booking listings where more than one Vacation  
1068 Rental is affiliated with a single permittee. Furthermore, the  
proposed ordinance provides  
1069 enhanced funding for enforcement, and it stipulates that Vacation Rentals

5 It stipulates that vacation rental permittees must pay a  
1070 fee for every night their Vacation Rental is rented, with the funds to be deposited into the Short  
1071 Term Rental Enforcement Fund. Given the success the City has had with curtailing illegal home-  
1072 sharing activity after enforcement began, with early data showing as much as a 40% decline in  
1073 the number of illegal listings, one can reasonably conclude that robust enforcement of the  
1074 Vacation Rental ordinance will be similarly effective at monitoring issues, encouraging platform  
1075 compliance, and eliminating permittees who deviate from the standards and regulations  
1076 contained in the proposed ordinance  
.

1077

1078

1079 Displacement

1080

1081 The proposed ordinance does not expressly authorize new development, and because of the

1082 significant restrictions placed on Vacation Rental activity, Vacation Rentals will occur in existing

1083 structures. While it is possible that an individual could construct a new house for the purposes of

1084 using it as a Vacation Rental, this is an unlikely scenario due to the high cost of real estate

1085 development in Los Angeles and limitations contained in the ordinance

that limit the profitability

1086 of operating a Vacation Rental, such as the 90-day cap on the

such as the 90 day cap on the number of days a Vacation

1087 Rental may be operated in a calendar year. Additionally, the ordinance will not have an adverse

1088 impact on the displacement of long-term renters due to provisions in the ordinance that prohibit

1089 RS0 and covenanted affordable units from being used for Vacation Rentals. Furthermore, by

1090 prohibiting Vacation Rentals from operating in buildings that have been taken off of the rental

678  
679

1091

1092

1093

1094

1095 Vacation Rentals Ordinance PAGE 22  
City of Los Angeles

1096 Initial Study June 2020

1097

1098

1099 market via the Ellis Act within the past 7 years, the incentive to evict existing tenants so that the

1100 building may be used for Vacation Rentals has been removed. While isolated instances of new

1101 construction and displacement may occur as a result of allowing some Vacation Rentals to

1102 legally operate in the City, there is no evidence that such instances would be widespread or

1103 would rise to any level of significance. The prohibitions and limitations contained in the

1104 ordinance help to ensure that the ordinance does not induce

new development of Vacation

1105 Rental properties or displace existing residents

680

1106

681

1107

Conclusion

682 Vacation Rentals Ordinance PAGE 16  
City of Los Angeles

1108

683 Initial Study December 2019

1109

The citywide, community plan area, and building level caps, as well as the distancing

1110

requirements for Type 1 buildings all serve to limit the concentration of Vacation Rental units at

1111

the citywide, neighborhood, block, and building levels. When viewed in conjunction with the

1112

eligibility requirements for obtaining a Vacation Rental permit, operational standards, and the

1113

prohibitions on the types of buildings that are permitted to be used for Vacation Rentals, it is

1114

clear that Project utilizes multiple measures to limit the scope and impact of the proposed

1115

ordinance on the environment and the City's housing stock. Enforcement of these provisions will

1116

largely utilize the framework that was established to enforce the Home Sharing Ordinance, and

1117

additional money will be deposited into the Short Term Rental Enforcement Fund to expand

1118

enforcement efforts to cover Vacation Rentals.

1119

1120

Below, in Section 4 of this document, is a discussion of potential impacts under each

1121

environmental factor. In most cases, the environmental factors are not impacted at all. In the

1122

few cases where there may be a potential impact, it has been

684  
685  
686  
687  
688  
689  
690  
691  
692  
693  
694  
695  
696  
697  
698  
699  
700  
701  
702  
703

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The Negative Declaration will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project.

The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

This Project is an enabling amendment to the Zoning Code that will allow owners of qualifying dwelling units to apply for permits to operate Vacation Rentals. Permits will be issued to applicants in accordance with the restrictions and requirements of the regulations as may be adopted by the City Council.

1123  
1124  
1125  
1126  
1127  
1128  
1129  
1130  
1131  
1132  
1133  
1134  
1135  
1136  
1137  
1138  
1139  
1140  
1141  
1142  
1143  
1144

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The Negative Declaration will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project.

The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

This Project is an enabling amendment to the Zoning Code that will allow owners of qualifying dwelling units to apply for permits to operate Vacation Rentals. Permits will be issued to applicants in accordance with the restrictions and requirements of the regulations as may be adopted by the City Council.

a potential impact, it has been determined to be less than significant. As a result, the Initial Study finds no potential significant impacts, and a Negative Declaration will be prepared.

703 INITIAL STUDY DECEMBER 2019  
704  
705  
706 INITIAL STUDY  
707 4 ENVIRONMENTAL IMPACT ANALYSIS  
708  
709  
710 I. AESTHETICS  
711  
712  
  
713  
714  
715 Potentially  
716 Significant  
717 Impact  
718 Less Than  
719 Significant  
720 with  
721 Mitigation  
722 Incorporated  
723 Less Than  
724 Significant  
725 Impact  
726 No Impact  
  
727 Except as provided in Public  
728 Resources Code Section 21099 would  
the project:  
729  
730 a. Have a substantial adverse e  
ffect on a scenic  
731 vista?  
732  
733 b. Substantially damage scenic reso  
urces, including,  
734 but not limited to, trees, roc  
k outcroppings, and  
735 historic buildings within a state s  
cenic highway?  
  
736  
737 c. In non-urbanized areas, substant  
ially degrade the  
738 existing visual character or qualit  
y of public views

1144 INITIAL STUDY JUNE 2020  
1145  
1146  
1147 INITIAL STUDY  
1148 4 ENVIRONMENTAL IMPACT ANALYSIS  
1149  
1150  
1151 I. AESTHETICS  
1152  
1153  
  
1154  
1155  
1156 Potentially  
1157 Significant  
1158 Impact  
1159 Less Than  
1160 Significant  
1161 with  
1162 Mitigation  
1163 Incorporated  
1164 Less Than  
1165 Significant  
1166 Impact No Impact  
  
1167 Except as provided in Public  
1168 Resources Code Section 21099 would  
the project:  
1169  
1170 a. Have a substantial adverse e  
ffect on a scenic  
1171 vista?  
1172  
1173 b. Substantially damage scenic reso  
urces,  
1174 including, but not limited  
to, trees, rock  
1175 outcroppings, and historic building  
s within a state  
1176 scenic highway?  
  
1177  
1178 c. In non-urbanized areas, subst  
antially degrade  
1179 the existing visual character o  
f quality of public

y of public views  
739 the site and its surroundings?  
(Public views are  
740 those that are experienced  
from publicly  
741 accessible vantage point). If t  
he project is in an  
742 urbanized area, would the  
project conflict with  
743 applicable zoning and other  
regulations governing  
744 scenic quality?

745  
746 d. Create a new source of subs  
tantial light or glare  
747 which would adversely affect da  
y or nighttime  
748 views in the area?  
749  
750

751 a) Have a substantial adverse eff  
ect on a scenic vista?

752 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize  
753 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps  
754 on the number that may operate, eli  
gibility restrictions, and prohibit  
ions on the types of buildings  
755 that may be used, Vacation Rentals  
are only permitted on a very limite  
d basis. The Project will  
756 not result in changes to a structur  
e's physical shape or size, nor wou  
ld it create any physical  
757 changes to the environment. Therefo  
re, no impact on a scenic vista wil  
l result.  
758  
759

y quality of public  
1180 views the site and its surr  
oundings? (Public  
1181 views are those that are  
experienced from  
1182 publicly accessible vantage poin  
t). If the project  
1183 is in an urbanized area, would the  
project conflict  
1184 with applicable zoning and  
other regulations  
1185 governing scenic quality?

1186  
1187 d. Create a new source of substanti  
al light or glare  
1188 which would adversely affect da  
y or nighttime  
1189 views in the area?  
1190  
1191

1192 a) Have a substantial adverse effec  
t on a scenic vista?

1193 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize  
1194 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps  
1195 on the number that may operate, eli  
gibility restrictions, and prohibit  
ions on the types of buildings  
1196 that may be used, Vacation Rentals  
are only permitted on a very limite  
d basis. The Project will  
1197 not result in changes to a structur  
e's physical shape or size, nor wou  
ld it create any physical  
1198 changes to the environment. Therefo  
re, no impact on a scenic vista wil  
l result.  
1199  
1200

763 Initial Study December 2019

764

765

766 b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

769 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize new development, and is not expected to induce growth or development because, due to caps on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a very limited basis. The Project does not include scenic resources within a scenic highway. No impact related to the Project will occur.

774

775 c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

779 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1204 Initial Study June 2020

1205

1206

1207 b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

1210 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize new development, and is not expected to induce growth or development because, due to caps on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a very limited basis. The Project does not include scenic resources within a scenic highway. No impact related to the Project will occur.

1215

1216

1217 c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

1221

1222 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

780 new development, and is not expected to induce growth or development because, due to caps on

781 the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that

782 may be used, Vacation Rentals are only permitted on a very limited basis. The existing visual

783 character or quality of public views of the site and its surroundings will not be impacted, and would

784 not conflict with any zoning or other regulations governing scenic quality.

785

786 d) Create a new source of substantial light or glare which would adversely affect daytime

787 or nighttime views in the area?

788 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

789 new development, and is not expected to induce growth or development because, due to caps

790 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

791 that may be used, Vacation Rentals are only permitted on a very limited basis. It will not

792 introduce new sources of substantial light or glare. No impact related to this issue would occur.

793

794

795

796

797

1223 new development, and is not expected to induce growth or development because, due to caps

1224 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

1225 that may be used, Vacation Rentals are only permitted on a very limited basis. The existing

1226 visual character or quality of public views of the site and its surroundings will not be impacted,

1227 and would not conflict with any zoning or other regulations governing scenic quality.

1228

1229 d) Create a new source of substantial light or glare which would adversely affect daytime

1230 or nighttime views in the area?

1231 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1232 new development, and is not expected to induce growth or development because, due to caps

1233 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

1234 that may be used, Vacation Rentals are only permitted on a very limited basis. It will not

1235 introduce new sources of substantial light or glare. No impact related to this issue would occur.

1236

1237

1238

1239

800  
801

802 II. AGRICULTURE AND FORESTRY RESOU  
RCES

803

804 In determining whether impacts  
to agricultural resources are s  
ignificant environmental effects,  
805 lead agencies may refer to the Cali  
fornia Agricultural Land Evaluation  
and Site Assessment Model  
806 (1997) prepared by the Californ  
ia Department of Conservation a  
s an optional model to use in  
807 assessing impacts on agriculture  
and farmland. In determining wh  
ether impacts to forest  
808 resources, including timberland, ar  
e significant environmental effects  
, lead agencies may refer to  
809 information compiled by the Califor  
nia Department of Forestry and Fire  
Protection regarding the  
810 state's inventory of forest lan  
d, including the Forest and Ra  
nge Assessment Project and the  
811 Forest Legacy Assessment Project  
; and forest carbon measurement  
methodology provided in  
812 Forest Protocols adopted by the Cal  
ifornia Air Resources Board.

813  
814  
815  
816  
817  
818 Potentially  
819 Significant  
820 Impact  
821 Less Than  
822 Significant  
823 with  
824 Mitigation  
825 Incorporated  
826 Less Than

1242  
1243

1244 II. AGRICULTURE AND FORESTRY RESOU  
RCES

1245

1246 In determining whether impacts  
to agricultural resources are s  
ignificant environmental effects,  
1247 lead agencies may refer to the  
California Agricultural Land Eva  
luation and Site Assessment  
1248 Model (1997) prepared by the C  
alifornia Department of Conserva  
tion as an optional model to  
1249 use in assessing impacts on agricul  
ture and farmland. In determining w  
hether impacts to forest  
1250 resources, including timberland,  
are significant environmental ef  
fects, lead agencies may refer  
1251 to information compiled by the Cali  
fornia Department of Forestry and F  
ire Protection regarding  
1252 the state's inventory of forest lan  
d, including the Forest and Range  
Assessment Project and the  
1253 Forest Legacy Assessment Project  
; and forest carbon measurement  
methodology provided in  
1254 Forest Protocols adopted by the Cal  
ifornia Air Resources Board.

1255  
1256  
1257  
1258  
1259  
1260 Potentially  
1261 Significant  
1262 Impact  
1263 Less Than  
1264 Significant  
1265 with  
1266 Mitigation  
1267 Incorporated  
1268 Less Than

827 Significant

828 Impact

829 No Impact

830 Would the project:

831

832 a. Convert Prime Farmland, Unique Farmland, or

833 Farmland of Statewide Importance (Farmland), as

834 shown on the maps prepared pursuant to the

835 Farmland Mapping and Monitoring Program of the

836 California Resources Agency, to non-agricultural

837 use?

838

839 b. Conflict with existing zoning for agricultural use, or

840 a Williamson Act contract?

841

842 c. Conflict with existing zoning for, or cause rezoning

843 of, forest land (as defined in Public Resources

844 Code section 12220(g)), timberland (as defined by

845 Public Resources Code section 4526), or

846 timberland zoned Timberland Production (as

847 defined by Government Code section 51104(g))?

848

849 d. Result in the loss of forest land or conversion of

850 forest land to non-forest use?

851

852 e. Involve other changes in the existing environment

853 which, due to their location or nature, could result

1269 Significant

1270 Impact No Impact

1271 Would the project:

1272 a. Convert Prime Farmland, Unique Farmland, or

1273 Farmland of Statewide Importance (Farmland),

1274 as shown on the maps prepared pursuant to the

1275 Farmland Mapping and Monitoring Program of

1276 the California Resources Agency, to non-

1277 agricultural use?

1278

1279 b. Conflict with existing zoning for agricultural use,

1280 or a Williamson Act contract?

1281

1282 c. Conflict with existing zoning for, or cause

1283 rezoning of, forest land (as defined in Public

1284 Resources Code section 12220(g)), timberland

1285 (as defined by Public Resources Code section

1286 4526), or timberland zoned Timberland

1287 Production (as defined by Government Code

1288 section 51104(g))?

1289

1290 d. Result in the loss of forest land or conversion of

1291 forest land to non-forest use?

1292

1293 e. Involve other changes in the existing environment

1294 which, due to their location or nature, could result

854 in conversion of Farmland, to non-  
agricultural use  
855 or conversion of forest land to  
non-forest use?

856

857

858

859

860  
861  
862 Vacation Rentals Ordinance PAGE 20  
City of Los Angeles

863 Initial Study December 2019

864

865

866 a) Convert Prime Farmland, Un  
ique Farmland, or Farmland of  
Statewide Importance

867 (Farmland), as shown on the ma  
ps prepared pursuant to the Fa  
rmland Mapping and

868 Monitoring Program of the Californi  
a Resources Agency, to non-agricult  
ural use?

869 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize

870 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps on

871 the number that may operate, eligib  
ility restrictions, and prohibitions  
on the types of buildings that

872 may be used, Vacation Rentals  
are only permitted on a very  
limited basis. It will not  
impact or

873 convert any farmland to non-agri  
cultural use, therefore, no im  
pacts related to this issue wo  
uld

874 occur.

875

1295 in conversion of Farmland, to  
non-agricultural  
1296 use or conversion of forest la  
nd to non-forest  
1297 use?

1298

1299

1300

1301

1302  
1303  
1304 Vacation Rentals Ordinance PAGE 26  
City of Los Angeles

1305 Initial Study June 2020

1306

1307

1308 a) Convert Prime Farmland, Un  
ique Farmland, or Farmland of  
Statewide Importance

1309 (Farmland), as shown on the ma  
ps prepared pursuant to the Fa  
rmland Mapping and

1310 Monitoring Program of the Californi  
a Resources Agency, to non-agricult  
ural use?

1311 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize

1312 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps

1313 on the number that may operate, eli  
gibility restrictions, and prohibi  
tions on the types of buildings

1314 that may be used, Vacation Rentals  
are only permitted on a very  
limited basis. It will not impact

1315 or convert any farmland to non-agri  
cultural use, therefore, no impacts  
related to this issue would

1316 occur.

1317

876 b) Conflict with existing zoning f  
or agricultural use, or a Williamso  
n Act contract?

877 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize

878 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps on

879 the number that may operate, eligib  
ility restrictions, and prohibition  
s on the types of buildings that

880 may be used, Vacation Rentals are o  
nly permitted on a very limited bas  
is. It will not change any

881 land zoned for agricultural use, an  
d the site is not under a Williamso  
n Act Contract. Thus, there

882 is no conflict with existing zoning  
for agricultural use, or a Williams  
on Act Contract. Therefore, no

883 impacts related to this issue would  
occur.

884

885 c) Conflict with existing zoning f  
or, or cause rezoning of, forest la  
nd (as defined in Public

886 Resources Code section 12220(g))  
, timberland (as defined by Pu  
blic Resources Code

887 section 4526), or timberland zo  
ned Timberland Production (as d  
efined by Government

888 Code section 51104(g))?

889 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize

890 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps on

891 the number that may operate, eligib  
ility restrictions, and prohibition  
s on the types of buildings that

1318 b) Conflict with existing zoning f  
or agricultural use, or a Williamso  
n Act contract?

1319 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize

1320 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps

1321 on the number that may operate, eli  
gibility restrictions, and prohibit  
ions on the types of buildings

1322 that may be used, Vacation Rentals  
are only permitted on a very limite  
d basis. It will not change

1323 any land zoned for agricultural use  
, and the site is not under a Willi  
amson Act Contract. Thus,

1324 there is no conflict with  
existing zoning for agricultural  
use, or a Williamson Act Contr  
act.

1325 Therefore, no impacts related to th  
is issue would occur.

1326

1327 c) Conflict with existing zon  
ing for, or cause rezoning of,  
forest land (as defined in

1328 Public Resources Code section 1  
2220(g)), timberland (as defined  
by Public Resources

1329 Code section 4526), or  
timberland zoned Timberland  
Production (as defined by

1330 Government Code section 51104(g))?

1331 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize

1332 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps

1333 on the number that may operate, eli  
gibility restrictions, and prohibit  
ions on the types of buildings

892 may be used, Vacation Rentals are only permitted on a very limited basis. It will not change any

893 land zoned as forest land or timberland. Therefore, no impacts related to this issue would occur.

894

895 d) Result in the loss of forest land or conversion of forest land to non-forest use?

896 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

897 new development, and is not expected to induce growth or development because, due to caps on

898 the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that

899 may be used, Vacation Rentals are only permitted on a very limited basis. It does not propose

900 changes to any forest land, therefore, no impacts related to this issue would occur.

901

902 e) Involve other changes in the existing environment which, due to their location or nature,

903 could result in conversion of Farmland to non-agricultural use or conversion of forest land

904 to non-forest use?

905 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

906 new development, and is not expected to induce growth or development because, due to caps

907 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

908

909

910

1334 that may be used, Vacation Rentals are only permitted on a very limited basis. It will not change

1335 any land zoned as forest land or timberland. Therefore, no impacts related to this issue would occur.

1336

1337

1338 d) Result in the loss of forest land or conversion of forest land to non-forest use?

1339 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1340 new development, and is not expected to induce growth or development because, due to caps

1341 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

1342 that may be used, Vacation Rentals are only permitted on a very limited basis. It does not

1343 propose changes to any forest land, therefore, no impacts related to this issue would occur.

1344

1345 e) Involve other changes in the existing environment which, due to their location or

1346 nature, could result in conversion of Farmland to non-agricultural use or conversion of

1347 forest land to non-forest use?

1348 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1349 new development, and is not expected to induce growth or development because, due to caps

1350 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

1351

1352

1353

910  
911  
912 Vacation Rentals Ordinance PAGE 21  
City of Los Angeles  
913 Initial Study December 2019  
914  
915  
916 that may be used, Vacation Rentals  
are only permitted on a very  
limited basis. No agricultural  
917 uses are included as part of the Pr  
oject, therefore, no impacts relate  
d to this issue would occur.  
918  
919

920  
921  
922  
923 Vacation Rentals Ordinance PAGE 22  
City of Los Angeles  
924 Initial Study December 2019  
925  
926

927 III. AIR QUALITY  
928  
929 Where available, the significance c  
riteria established by the South Co  
ast Air Quality Management  
930 District (SCAQMD) may be relied upo  
n to make the following determinati  
ons.  
931

932  
933  
934  
935  
936 Potentially  
937 Significant  
938 Impact  
939 Less Than  
940 Significant  
941 with  
942 Mitigation  
943 Incorporated  
944 Less Than  
945 Significant

1353  
1354  
1355 Vacation Rentals Ordinance PAGE 27  
City of Los Angeles  
1356 Initial Study June 2020  
1357  
1358  
1359 that may be used, Vacation Ren  
tals are only permitted on a  
very limited basis. No agricultur  
al  
1360 uses are included as part of the Pr  
oject, therefore, no impacts relate  
d to this issue would occur.  
1361

1362  
1363  
1364  
1365 Vacation Rentals Ordinance PAGE 28  
City of Los Angeles  
1366 Initial Study June 2020  
1367  
1368

1369 III. AIR QUALITY  
1370  
1371 Where available, the signific  
ance criteria established by  
the South Coast Air Quality  
1372 Management District (SCAQMD) may be  
relied upon to make the following d  
eterminations.  
1373

1374  
1375  
1376  
1377  
1378 Potentially  
1379 Significant  
1380 Impact  
1381 Less Than  
1382 Significant  
1383 with  
1384 Mitigation  
1385 Incorporated  
1386 Less Than  
1387 Significant

945 Significant  
946 Impact No Impact  
947 Would the project:  
948  
949 a. Conflict with or obstruct im-  
plementation of the  
950 applicable air quality plan?  
951  
952 b. Result in a cumulatively conside-  
rable net increase  
953 of any criteria pollutant for which  
the project region  
954 is non-attainment under an appl-  
icable federal or  
955 state ambient air quality standard?  
956  
957 c. Expose sensitive receptors to  
substantial pollutant  
958 concentrations?  
959  
960 d. Result in other emissions (such  
as those leading  
961 to odors) adversely affecting a su-  
bstantial number  
962 of people?  
963  
964  
965  
966  
967  
968  
969 Vacation Rentals Ordinance PAGE 23  
City of Los Angeles  
970 Initial Study December 2019  
971  
972  
973 a) Conflict with or obstruct imple-  
mentation of the applicable air qua-  
lity plan?  
974 No Impact. Based upon the analysis  
set forth above, the Project does n

1387 Significant  
1388 Impact No Impact  
1389 Would the project:  
1390 a. Conflict with or obstruct im-  
plementation of the  
1391 applicable air quality plan?  
1392  
1393 b. Result in a cumulatively  
considerable net  
1394 increase of any criteria  
pollutant for which the  
1395 project region is non-atta-  
inment under an  
1396 applicable federal or state  
ambient air quality  
1397 standard?  
1398  
1399 c. Expose sensitive recepto-  
rs to substantial  
1400 pollutant concentrations?  
1401  
1402 d. Result in other emissions (such  
as those leading  
1403 to odors) adversely affecting a  
substantial  
1404 number of people?  
1405  
1406  
1407  
1408  
1409  
1410  
1411 Vacation Rentals Ordinance PAGE 29  
City of Los Angeles  
1412 Initial Study June 2020  
1413  
1414  
1415 a) Conflict with or obstruct imple-  
mentation of the applicable air qua-  
lity plan?  
1416 No Impact. Based upon the analysis  
set forth above, the Project does n

set forth above, the Project does not expressly authorize

975 new development, and is not expected to induce growth or development because, due to caps on

976 the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that

977 may be used, Vacation Rentals are only permitted on a very limited basis. For the reasons set

978 forth above, it is not anticipated the Project will result in an increase in use of residences, an

979 increase in traffic or a change in traffic patterns that would increase or a change in traffic patterns

980 that would increase or change vehicle emissions from existing conditions. As such, it would not

981 conflict or obstruct implementation of applicable air quality plans.

982

983 b) Result in a cumulatively considerable net increase of any criteria pollutant for which

984 the air basin is non-attainment under an applicable federal or state ambient air quality

985 standard?

986 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

987 new development, and is not expected to induce growth or development because, due to caps on

988 the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that

989 may be used, Vacation Rentals are only permitted on a very limited basis.

set forth above, the Project does not expressly authorize

1417 new development, and is not expected to induce growth or development because, due to caps

1418 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

1419 that may be used, Vacation Rentals are only permitted on a very limited basis. For the reasons

1420 set forth above, it is not anticipated the Project will result in an increase in use of residences, an

1421 increase in traffic or a change in traffic patterns that would increase or a change in traffic

1422 patterns that would increase or change vehicle emissions from existing conditions. As such, it

1423 would not conflict or obstruct implementation of applicable air quality plans.

1424

1425 b) Result in a cumulatively considerable net increase of any criteria pollutant for which

1426 the air basin is non-attainment under an applicable federal or state ambient air quality

1427 standard?

1428 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1429 new development, and is not expected to induce growth or development because, due to caps

1430 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

1431 that may be used, Vacation Rentals are only permitted on a very limited basis.

only permitted on a very limited basis. For the reasons set forth above, it is not anticipated the Project will result in an increase in use of residences, an increase in traffic or a change in traffic patterns that would increase or change vehicle emissions from existing conditions. Accordingly, short-term rental activities permitted by this Project will not violate air quality standards or contribute substantially to an existing or projected violation.

994

995 c) Expose sensitive receptors to substantial pollutant concentrations?

996 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

997 new development, and is not expected to induce growth or development because, due to caps on

998 the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that

999 may be used, Vacation Rentals are only permitted on a very limited basis. For the reasons set

1000 forth above, it is not anticipated that the Project will result in an increase in the use of residences,

1001 an increase in traffic or a change in traffic patterns that would increase or change vehicle

1002 emissions from existing conditions. Accordingly, short-term rental activities permitted by this

1003 Project will not facilitate the generation or emission of any criteria pollutant from the emissions

are only permitted on a very limited basis. For the reasons set forth above, it is not anticipated the Project will result in an increase in use of residences, an increase in traffic or a change in traffic patterns that would increase or change vehicle emissions from existing conditions. Accordingly, short-term rental activities permitted by this Project will not violate air quality standards or contribute substantially to an existing or projected violation.

1436

1437 c) Expose sensitive receptors to substantial pollutant concentrations?

1438 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1439 new development, and is not expected to induce growth or development because, due to caps

1440 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

1441 that may be used, Vacation Rentals are only permitted on a very limited basis. For the reasons

1442 set forth above, it is not anticipated that the Project will result in an increase in the use of

1443 residences, an increase in traffic or a change in traffic patterns that would increase or change

1444 vehicle emissions from existing conditions. Accordingly, short-term rental activities permitted by

1445 this Project will not facilitate the generation or emission of any criteria pollutant from the

1004 resulting from existing environmental conditions and would not expose sensitive receptors to pollutants. No related impacts would occur.

1006  
1007 d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

1008  
1009 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize  
1010 new development, and is not expected to induce growth or development because, due to caps  
1011 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings  
1012 that may be used, Vacation Rentals are only permitted on a very limited basis. As such,  
1013 activities permitted by the Project would not result in the reasonably foreseeable creation of  
1014 objectionable odors and therefore, there is no impact.

1015  
1016

1017  
1018  
1019 Vacation Rentals Ordinance PAGE 24 City of Los Angeles  
1020 Initial Study December 2019  
1021  
1022

1023 IV. BIOLOGICAL RESOURCES  
1024  
1025  
1026  
1027  
1028  
1029

Potentially  
1030 Significant  
1031 Impact

1446 any criteria pollutant from the emissions resulting from existing environmental conditions and would not expose sensitive receptors to pollutants. No related impacts would occur.

1448  
1449 d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

1450  
1451 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize  
1452 new development, and is not expected to induce growth or development because, due to caps  
1453 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings  
1454 that may be used, Vacation Rentals are only permitted on a very limited basis. As such,  
1455 activities permitted by the Project would not result in the reasonably foreseeable creation of  
1456 objectionable odors and therefore, there is no impact.

1457  
1458

1459  
1460  
1461 Vacation Rentals Ordinance PAGE 30 City of Los Angeles  
1462 Initial Study June 2020  
1463  
1464

1465 IV. BIOLOGICAL RESOURCES  
1466  
1467  
1468  
1469  
1470  
1471

Potentially  
1472 Significant  
1473 Impact

1031 Impact  
1032 Less Than  
1033 Significant  
1034 with  
1035 Mitigation  
1036 Incorporated  
1037 Less Than  
1038 Significant  
1039 Impact  
1040 No Impact  
1041  
1042 Would the project:  
1043  
1044 a. Have a substantial adverse effect, either directly or  
1045 through habitat modifications, on any species  
1046 identified as a candidate, sensitive, or special  
1047 status species in local or regional plans, policies,  
1048 or regulations, or by the California Department of  
1049 Fish and Wildlife or U.S. Fish and Wildlife Service?  
1050  
1051 b. Have a substantial adverse effect on any riparian  
1052 habitat or other sensitive natural community  
1053 identified in local or regional plans, policies,  
1054 regulations or by the California Department of Fish  
1055 and Wildlife or US Fish and Wildlife Service?  
1056  
1057 c. Have a substantial adverse effect on state or  
1058 federally protected wetlands (including, but not  
1059 limited to, marsh, vernal pools, coastal etc.)

1473 Impact  
1474 Less Than  
1475 Significant  
1476 with  
1477 Mitigation  
1478 Incorporated  
1479 Less Than  
1480 Significant  
1481 Impact No Impact  
1482  
1483 Would the project:  
1484 a. Have a substantial adverse effect, either directly  
1485 or through habitat modifications, on any species  
1486 identified as a candidate, sensitive, or special  
1487 status species in local or regional plans, policies,  
1488 or regulations, or by the California Department of  
1489 Fish and Wildlife or U.S. Fish and Wildlife  
1490 Service?  
1491  
1492 b. Have a substantial adverse effect on any riparian  
1493 habitat or other sensitive natural community  
1494 identified in local or regional plans, policies,  
1495 regulations or by the California Department of  
1496 Fish and Wildlife or US Fish and Wildlife Service?  
1497  
1498 c. Have a substantial adverse effect on state or  
1499 federally protected wetlands (including, but not  
1500 limited to, marsh, vernal pools, coastal etc.)

1060 through direct removal, filling, hydrological interruption, or other means?  
1062  
1063 d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?  
1068  
1069 e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?  
1072  
1073 f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?  
1077  
1078  
1079  
1080  
1081  
1082  
1083 Vacation Rentals Ordinance PAGE 25 City of Los Angeles  
1084 Initial Study December 2019  
1085  
1086  
1087 a) Have a substantial adverse effect, either directly or through habitat modifications, on  
1088 any species identified as a candidate, sensitive, or special status species in local or

1501 through direct removal, filling, hydrological interruption, or other means?  
1503  
1504 d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?  
1509  
1510 e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?  
1513  
1514 f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?  
1518  
1519  
1520  
1521  
1522  
1523  
1524 Vacation Rentals Ordinance PAGE 31 City of Los Angeles  
1525 Initial Study June 2020  
1526  
1527  
1528 a) Have a substantial adverse effect, either directly or through habitat modifications, on  
1529 any species identified as a candidate, sensitive, or special status species in local or

status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

1091 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1092 new development, and is not expected to induce growth or development because, due to caps on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a very limited basis. As such, activities permitted by the proposed ordinance would not result in the reasonably foreseeable impacts to

1096 the habitats and species identified in the above question.

1098 b) Have a substantial adverse effect on any riparian habitat or other sensitive natural

1099 community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

1101 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1102 new development, and is not expected to induce growth or development because, due to caps on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a very

status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

1532 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1533 new development, and is not expected to induce growth or development because, due to caps on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a very limited basis. As such, activities permitted by the proposed ordinance would not result in the reasonably foreseeable

1537 impacts to the habitats and species identified in the above question.

1539 b) Have a substantial adverse effect on any riparian habitat or other sensitive natural

1540 community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

1542 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1543 new development, and is not expected to induce growth or development because, due to caps on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a

are only permitted on a very limited basis. As such, activities

1105 permitted by the Project would not result in reasonably foreseeable impacts to habitats or natural communities referenced in the above question.

1107

1108 c) Have a substantial adverse effect on state or federally protected wetlands (including,

1109 but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling,

1110 hydrological interruption, or other means?

1111 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1112 new development, and is not expected to induce growth or development because, due to caps on

1113 the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that

1114 may be used, Vacation Rentals are only permitted on a very limited basis. As such, activities

1115 permitted by the proposed ordinance would not result in the reasonably foreseeable impacts to

1116 any wetlands.

1117

1118 d) Interfere substantially with the movement of any native resident or migratory fish or

1119 wildlife species or with established native resident or migratory

1120 ory wildlife corridors, or

impede the use of native wildlife nursery sites?

are only permitted on a very limited basis. As such,

1546 activities permitted by the Project would not result in reasonably foreseeable impacts to habitats or natural communities referenced in the above question.

1548

1549 c) Have a substantial adverse effect on state or federally protected wetlands (including,

1550 but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling,

1551 hydrological interruption, or other means?

1552 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1553 new development, and is not expected to induce growth or development because, due to caps

1554 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

1555 that may be used, Vacation Rentals are only permitted on a very limited basis. As such,

1556 activities permitted by the proposed ordinance would not result in the reasonably foreseeable

1557 impacts to any wetlands.

1558

1559 d) Interfere substantially with the movement of any native resident or migratory fish or

1560 wildlife species or with established native resident or migratory

1561 ory wildlife corridors, or

impede the use of native wildlife nursery sites?

nursery sites:

1121 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize  
1122 new development, and is not expected to induce growth or development because, due to caps on  
1123 the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that  
1124 may be used, Vacation Rentals are only permitted on a very limited basis. As such, activities  
1125 permitted by the proposed ordinance would not result in a reasonably foreseeable impact or  
1126 modification to any wildlife corridors or native wildlife nursery sites.

1127  
1128  
1129  
1130  
1131

1132  
1133  
1134 Vacation Rentals Ordinance PAGE 26  
City of Los Angeles  
1135 Initial Study December 2019  
1136  
1137

1138 e) Conflict with any local policies or ordinances protecting biological resources, such as

1139 a tree preservation policy or ordinance?

1140 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1141 new development, and is not expected to induce growth or development because, due to caps on

1142 the number that may operate, eligibility restrictions, and prohibitions

nursery sites:

1562 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize  
1563 new development, and is not expected to induce growth or development because, due to caps  
1564 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings  
1565 that may be used, Vacation Rentals are only permitted on a very limited basis. As such,  
1566 activities permitted by the proposed ordinance would not result in a reasonably foreseeable  
1567 impact or modification to any wildlife corridors or native wildlife nursery sites.

1568  
1569  
1570  
1571  
1572

1573  
1574  
1575 Vacation Rentals Ordinance PAGE 32  
City of Los Angeles  
1576 Initial Study June 2020  
1577  
1578

1579 e) Conflict with any local policies or ordinances protecting biological resources, such as

1580 a tree preservation policy or ordinance?

1581 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1582 new development, and is not expected to induce growth or development because, due to caps

1583 on the number that may operate, eligibility restrictions, and prohibitions

1143 ability restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a very limited basis. As such, activities permitted by the Project would not result in a reasonably foreseeable conflict with existing policies protecting biological resources. Therefore, no impacts related to this issue would occur.

1146  
1147 f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

1150 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize new development, and is not expected to induce growth or development because, due to caps on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a very limited basis. There are no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or any other approved habitat conservation plans in the City. Therefore, the Project would not conflict with

1156 the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan

1584 ability restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a very limited basis. As such, activities permitted by the Project would not result in a reasonably foreseeable conflict with existing policies protecting biological resources. Therefore, no impacts related to this issue would occur.

1588  
1589 f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

1592 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize new development, and is not expected to induce growth or development because, due to caps on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a very limited basis. There are no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or any other approved habitat conservation plans in the City. Therefore, the Project would not conflict with

1598 the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan

City Conservation Plan,  
1157 or other approved local, regional,  
or state habitat conservation plan,  
and no impacts related to  
1158 this issue would occur.

1159  
1160  
1161

1162  
1163  
1164 Vacation Rentals Ordinance PAGE 27  
City of Los Angeles  
1165 Initial Study December 2019

1166  
1167

1168 V. CULTURAL RESOURCES

1169  
1170  
1171  
1172  
1173

1174 Potentially  
1175 Significant  
1176 Impact  
1177 Less Than  
1178 Significant  
1179 with  
1180 Mitigation  
1181 Incorporated  
1182 Less Than  
1183 Significant

1184 Impact  
1185 No Impact  
1186 Would the project:

1187  
1188 a. Cause a substantial adverse  
change in the  
1189 significance of a historical resource pursuant to §

1190 15064.5?  
1191

1192 b. Cause a substantial adverse  
change in the  
1193 significance of an archaeological resource

City Conservation Plan,  
1599 or other approved local, regional,  
or state habitat conservation plan,  
and no impacts related to  
1600 this issue would occur.

1601  
1602  
1603

1604  
1605  
1606 Vacation Rentals Ordinance PAGE 33  
City of Los Angeles  
1607 Initial Study June 2020

1608  
1609

1610 V. CULTURAL RESOURCES

1611  
1612  
1613  
1614  
1615

1616 Potentially  
1617 Significant  
1618 Impact  
1619 Less Than  
1620 Significant  
1621 with  
1622 Mitigation  
1623 Incorporated  
1624 Less Than  
1625 Significant

1626 Impact No Impact  
1627 Would the project:  
1628 a. Cause a substantial adverse  
change in the

1629 significance of a historical resource pursuant to §  
1630 15064.5?  
1631

1632 b. Cause a substantial adverse  
change in the  
1633 significance of an archaeological resource

1194 pursuant to § 15064.5?  
 1195  
 1196 c. Disturb any human remains,  
 including those  
 1197 interred outside of dedicated cemet  
 eries?  
 1198  
 1199  
 1200

1634 pursuant to § 15064.5?  
 1635  
 1636 c. Disturb any human remains,  
 including those  
 1637 interred outside of dedicated cemet  
 eries?  
 1638  
 1639  
 1640

1201  
 1202  
 1203 Vacation Rentals Ordinance PAGE 28  
 City of Los Angeles  
 1204 Initial Study December 2019  
 1205  
 1206  
 1207

1641  
 1642  
 1643 Vacation Rentals Ordinance PAGE 34  
 City of Los Angeles  
 1644 Initial Study June 2020  
 1645  
 1646  
 1647

1208 a) Cause a substantial advers  
 e change in the significance o  
 f a historical resource as  
 1209 pursuant to State CEQA Guidelines §  
 15064.5?

1648 a) Cause a substantial advers  
 e change in the significance o  
 f a historical resource as  
 1649 pursuant to State CEQA Guidelines §  
 15064.5?

1210 No Impact. State CEQA Guidelines  
 Section 15064.5 defines an hist  
 orical resource as: 1) a  
 1211 resource listed in or determined to  
 be eligible by the State Historical  
 Resources Commission for  
 1212 listing in the California Register  
 of Historical Resources; 2) a resou  
 rce listed in a local register of

1650 No Impact. State CEQA Guidelines  
 Section 15064.5 defines an hist  
 orical resource as: 1) a  
 1651 resource listed in or determined to  
 be eligible by the State Historical  
 Resources Commission for  
 1652 listing in the California Register  
 of Historical Resources; 2) a resou  
 rce listed in a local register of

1213 historical resources or identified  
 as significant in a historical reso  
 urce survey meeting certain state  
 1214 guidelines; or 3) an object, buildi  
 ng, structure, site, area, place, r  
 ecord or manuscript which a lead  
 1215 agency determines to be  
 significant in the architectural,  
 engineering, scientific, econo  
 mic,

1653 historical resources or identi  
 fied as significant in a histori  
 cal resource survey meeting  
 certain  
 1654 state guidelines; or 3) an object,  
 building, structure, site, area, pl  
 ace, record or manuscript which  
 1655 a lead agency determines to be  
 significant in the architectural, e  
 ngineering, scientific, economic,

1216 agricultural, educational, social,  
 political, military, or cultural an

1656 agricultural, educational,  
 social, political, military, or

political, military, or cultural annals of California, provided that the  
1217 lead agency's determination is supported by substantial evidence in light of the whole record. A  
1218 project-related significant adverse effect would occur if a project would to adversely affect a  
1219 historical resource meeting one of the above definitions. Based upon the analysis set forth above,  
1220 the Project does not expressly authorize new development, and is not expected to induce growth  
1221 or development because, due to caps on the number that may operate, eligibility restrictions, and  
1222 prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a  
1223 very limited basis. As such, activities permitted by the proposed ordinance would not result in  
1224 reasonably foreseeable impacts to historic structures, as they will not be affected by the Project  
1225 because the ordinance does not specifically authorize development-related activities, nor will it  
1226 result in reasonably foreseeable new development that could potentially impact historical  
1227 resources. Thus, the Project would not cause a substantial adverse change in the significance of  
1228 a historical resource defined in §15064.5. Therefore, no impacts related to historical resources

social, political, military, or cultural annals of California, provided that  
1657 the lead agency's determination is supported by substantial evidence in light of the whole  
1658 record. A project-related significant adverse effect would occur if a project would to adversely  
1659 affect a historical resource meeting one of the above definitions. Based upon the analysis set  
1660 forth above, the Project does not expressly authorize new development, and is not expected to  
1661 induce growth or development because, due to caps on the number that may operate, eligibility  
1662 restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals  
1663 are only permitted on a very limited basis. As such, activities permitted by the proposed ordinance  
1664 would not result in reasonably foreseeable impacts to historic structures, as they will not be  
1665 affected by the Project because the ordinance does not specifically authorize development-  
1666 related activities, nor will it result in reasonably foreseeable new development that could  
1667 potentially impact historical resources. Thus, the Project would not cause a substantial adverse  
1668 change in the significance of a historical resource defined in §15064.5. Therefore, no impacts

1229 would occur as a result of the ordinance.

1230

1231 b) Cause a substantial adverse change in the significance of an archaeological resource

1232 pursuant to State CEQA Guidelines § 15064.5?

1233 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1234 new development, and is not expected to induce growth or development because, due to caps on

1235 the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that

1236 may be used, Vacation Rentals are only permitted on a very limited basis. No grading or

1237 excavation is proposed as part of the Project, nor are such activities reasonably foreseeable

1238 consequences of activities authorized by the Project. Therefore, no impacts related to this issue

1239 would occur.

1240

1241 c) . Directly or indirectly destroy a unique paleontological resource or site or unique

1242 geologic feature?

1243 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1244 new development, and is not expected to induce growth or development because, due to caps

1245 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

1246 that may be used. Vacation Rentals

1669 related to historical resources would occur as a result of the ordinance.

1670

1671 b) Cause a substantial adverse change in the significance of an archaeological resource

1672 pursuant to State CEQA Guidelines § 15064.5?

1673 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1674 new development, and is not expected to induce growth or development because, due to caps

1675 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

1676 that may be used, Vacation Rentals are only permitted on a very limited basis. No grading or

1677 excavation is proposed as part of the Project, nor are such activities reasonably foreseeable

1678 consequences of activities authorized by the Project. Therefore, no impacts related to this issue

1679 would occur.

1680

1681 c) . Directly or indirectly destroy a unique paleontological resource or site or unique

1682 geologic feature?

1683 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1684 new development, and is not expected to induce growth or development because, due to caps

1685 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

1686 that may be used. Vacation Rentals

1240 that may be used, vacation rentals  
are only permitted on a very limited  
basis. No grading or  
1247 excavation is proposed as part of the  
Project, nor are such activities  
reasonably foreseeable  
1248 consequences of activities authorized  
by the Project. Therefore, no impacts  
related to this issue  
1249 would occur.

1250

1251

1252

1253

1254 Vacation Rentals Ordinance PAGE 29  
City of Los Angeles

1255 Initial Study December 2019

1256

1257

1258

1259 d) Disturb any human remains, including  
those interred outside of formal  
cemeteries?

1260 No Impact. Based upon the analysis  
set forth above, the Project does not  
expressly authorize

1261 new development, and is not expected  
to induce growth or development  
because, due to caps on

1262 the number that may operate, eligibility  
restrictions, and prohibitions  
on the types of buildings that

1263 may be used, Vacation Rentals  
are only permitted on a very  
limited basis. No grading or

1264 excavation is proposed as part  
of the project, nor are such  
activities a reasonably foreseeable  
consequence of activities authorized

1265 by the Project. Therefore, no impacts  
related to this issue  
1266 would occur.

1266 would occur.

1688 that may be used, vacation rentals  
are only permitted on a very limited  
basis. No grading or

1687 excavation is proposed as part  
of the Project, nor are such  
activities reasonably foreseeable

1688 consequences of activities authorized  
by the Project. Therefore, no impacts  
related to this issue

1689 would occur.

1690

1691

1692

1693

1694 Vacation Rentals Ordinance PAGE 35  
City of Los Angeles

1695 Initial Study June 2020

1696

1697

1698

1699 d) Disturb any human remains, including  
those interred outside of formal  
cemeteries?

1700 No Impact. Based upon the analysis  
set forth above, the Project does not  
expressly authorize

1701 new development, and is not expected  
to induce growth or development  
because, due to caps on

1702 the number that may operate, eligibility  
restrictions, and prohibitions  
on the types of buildings that

1703 that may be used, Vacation Rentals  
are only permitted on a very  
limited basis. No grading or

1704 excavation is proposed as part of  
the project, nor are such activities  
a reasonably foreseeable

1705 consequence of activities authorized  
by the Project. Therefore, no impacts  
related to this issue

1706 would occur.

1266 would occur.  
1267  
1268  
1269  
1270  
1271  
1272 Vacation Rentals Ordinance PAGE 30  
City of Los Angeles  
1273 Initial Study December 2019  
1274  
1275  
1276 VI. ENERGY  
1277  
1278  
1279  
1280  
1281  
1282 Potentially  
1283 Significant  
1284 Impact  
  
1285 Less Than  
1286 Significant  
1287 with  
1288 Mitigation  
1289 Incorporated  
  
1290 Less Than  
1291 Significant  
1292 Impact  
1293 No Impact  
1294 Would the project:  
1295  
1296 a. Result in potentially sign  
ificant environmental  
1297 impact due to wasteful, inefficient  
, or unnecessary  
  
1298 consumption of energy resources,  
during project  
1299 construction or operation?  
1300  
1301 b. Conflict with or obstruct a  
state or local plan for  
1302 renewable energy or energy efficien  
cy?  
1303  
1304

1700 would occur.  
1707  
1708  
1709  
1710  
1711  
1712 Vacation Rentals Ordinance PAGE 36  
City of Los Angeles  
1713 Initial Study June 2020  
1714  
1715  
1716 VI. ENERGY  
1717  
1718  
1719  
1720  
1721  
1722 Potentially  
1723 Significant  
1724 Impact  
  
1725 Less Than  
1726 Significant  
1727 with  
1728 Mitigation  
1729 Incorporated  
  
1730 Less Than  
1731 Significant  
1732 Impact No Impact  
1733 Would the project:  
  
1734 a. Result in potentially sign  
ificant environmental  
1735 impact due to wasteful, inefficient  
, or unnecessary  
  
1736 consumption of energy resources,  
during project  
1737 construction or operation?  
1738  
1739 b. Conflict with or obstruct a  
state or local plan for  
1740 renewable energy or energy efficien  
cy?  
1741  
1742

1305 a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

1307

1308 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1309 new development, and is not expected to induce growth or development because, due to caps on

1310 the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that

1311 may be used, Vacation Rentals are only permitted on a very limited basis. The Project is not

1312 intensifying the use of any existing residential structures beyond the baseline conditions, and

1313 there is no evidence that Vacation Rental activity results in significant increases in the

1314 consumption of energy resources compared to existing conditions.

Therefore, no related impacts would occur.

1316

1317 b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

1318

1319 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1320 new development, and is not expected to induce growth or development because, due to caps on

1321 the number that may operate, eligib

1743 a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or

1745 operation?

1746

1747 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1748 new development, and is not expected to induce growth or development because, due to caps

1749 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

1750 that may be used, Vacation Rentals are only permitted on a very limited basis. The Project is

1751 not intensifying the use of any existing residential structures beyond the baseline conditions,

1752 and there is no evidence that Vacation Rental activity results in significant increases in the

1753 consumption of energy resources compared to existing conditions.

Therefore, no related impacts would occur.

1755

1756 b) Conflict with or obstruct a state or local plan for renewable energy or energy

1757 efficiency?

1758

1759 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1760 new development, and is not expected to induce growth or development because, due to caps

1761 on the number that may operate, eli

1321 the number that may operate, eligi-  
1322 bility restrictions, and prohibition  
1323 s on the types of buildings that  
1324 may be used, Vacation Rentals  
1325 are only permitted on a very  
1326 limited basis. The Project is  
1327 not  
1328 intensifying the use of any existin-  
1329 g residential structures beyond the  
1330 baseline conditions, and it  
1331 will not conflict or obstruct  
1332 any plans for renewable energy  
1333 or energy efficiency. Therefore,  
1334 no  
1335 related impacts would occur.

1326  
1327  
1328  
1329  
1330

1331  
1332  
1333 Vacation Rentals Ordinance PAGE 31  
1334 City of Los Angeles  
1335 Initial Study December 2019

1336

1337 VII. GEOLOGY AND SOILS

1338  
1339  
1340  
1341

1342  
1343 Potentially

1344 Significant  
1345 Impact  
1346 Less Than  
1347 Significant  
1348 with  
1349 Mitigation  
1350 Incorporated  
1351 Less Than  
1352 Significant

1353 Impact  
1354 No Impact

1761 on the number that may operate, eli-  
1762 gibility restrictions, and prohibit  
1763 ions on the types of buildings  
1764 that may be used, Vacation Ren-  
1765 tals are only permitted on a  
1766 very limited basis. The Project  
1767 is

1768 not intensifying the use of  
1769 any existing residential  
1770 structures beyond the baseline  
1771 conditions,

1772 and it will not conflict or  
1773 obstruct any plans for renewable  
1774 energy or energy efficiency. Theref-  
1775 ore,

1776 no related impacts would occur.

1766  
1767  
1768  
1769  
1770

1771  
1772  
1773 Vacation Rentals Ordinance PAGE 37  
1774 City of Los Angeles  
1775 Initial Study June 2020

1775  
1776

1777 VII. GEOLOGY AND SOILS

1778  
1779  
1780  
1781

1782  
1783 Potentially

1784 Significant  
1785 Impact  
1786 Less Than  
1787 Significant  
1788 with  
1789 Mitigation  
1790 Incorporated  
1791 Less Than  
1792 Significant

1793 Impact No Impact  
1794 Would the project:

1354 no impact  
1355 Would the project:  
1356  
1357 a. Directly or indirectly cause  
substantial adverse  
1358 effects, including the risk of  
loss, injury, or death  
1359 involving:  
1360  
1361 i. Rupture of a known earth  
quake fault, as  
1362 delineated on the most recent A  
lquist-Priolo  
1363 Earthquake Fault Zoning Map iss  
ued by the  
1364 State Geologist for the area or bas  
ed on other  
1365 substantial evidence of a known  
fault? Refer to  
1366 Division of Mines and  
Geology Special  
1367 Publication 42.  
1368  
1369 ii. Strong seismic ground shaking?  
1370  
1371 iii. Seismic-related ground  
failure, including  
1372 liquefaction?  
1373  
1374 iv. Landslides?  
1375  
1376 b. Result in substantial soil e  
rosion or the loss of  
1377 topsoil?  
1378  
1379 c. Be located on a geologic un  
it that is unstable, or  
1380 that would become unstable as  
a result of the  
1381 project, and potentially result  
in on- or off-site

1794 would the project:  
1795 a. Directly or indirectly cause s  
ubstantial adverse  
1796 effects, including the risk of  
loss, injury, or death  
1797 involving:  
1798  
1799 i. Rupture of a known earth  
quake fault, as  
1800 delineated on the most recent  
Alquist-Priolo  
1801 Earthquake Fault Zoning Map iss  
ued by the  
1802 State Geologist for the area or bas  
ed on other  
1803 substantial evidence of a known  
fault? Refer  
1804 to Division of Mines and  
Geology Special  
1805 Publication 42.  
1806  
1807 ii. Strong seismic ground shaking?  
1808 iii. Seismic-related ground fai  
lure, including  
1809 liquefaction?  
1810  
1811 iv. Landslides?  
1812 b. Result in substantial soil e  
rosion or the loss of  
1813 topsoil?  
1814  
1815 c. Be located on a geologic un  
it that is unstable, or  
1816 that would become unstable as  
a result of the  
1817 project, and potentially result  
in on- or off-site

1382 landslide, lateral spreading,  
1383 liquefaction, or collapse?  
1384  
1385 d. Be located on expansive soil, as  
1386 defined in Table  
1387 18-1-B of the Uniform Building  
1388 Code (1994),  
1389 creating substantial direct or  
1390 indirect risks to life or  
1391 property?  
1392  
1393 e. Have soils incapable of adequately  
1394 supporting the  
1395 use of septic tanks or alternative  
1396 waste water disposal systems where  
1397 sewers are not available  
1398 for the disposal of waste water?  
1399  
1400 f. Directly or indirectly destroy a  
1401 unique paleontological  
1402 resource or site or unique geologic  
1403 feature?  
1404  
1405  
1406  
1407  
1408 a) Directly or indirectly cause potential  
1409 substantial adverse effects,  
1410 including the risk of  
1411 loss, injury, or death involving:  
1412 i) Rupture of a known earthquake  
1413 fault, as delineated on the most  
1414 recent Alquist-Priolo  
1415 Earthquake Fault Zoning Map issued

1818 landslide, lateral spreading, subsidence,  
1819 liquefaction, or collapse?  
1820  
1821 d. Be located on expansive soil, as  
1822 defined in Table  
1823 18-1-B of the Uniform Building  
1824 Code (1994),  
1825 creating substantial direct or  
1826 indirect risks to life  
1827 or property?  
1828  
1829 e. Have soils incapable of adequately  
1830 supporting the  
1831 use of septic tanks or alternative  
1832 waste water disposal systems where  
1833 sewers are not available  
1834 for the disposal of waste water?  
1835  
1836 f. Directly or indirectly destroy a  
1837 unique paleontological  
1838 resource or site or unique  
1839 geologic feature?  
1840  
1841  
1842  
1843  
1844  
1845 a) Directly or indirectly cause potential  
1846 substantial adverse effects,  
1847 including the risk of  
1848 loss, injury, or death involving:  
1849 i) Rupture of a known earthquake  
1850 fault, as delineated on  
1851 the most recent Alquist-  
1852 Priolo Earthquake Fault Zoning

1411 Earthquake Fault Zoning Map issued  
by the State Geologist for the area  
or based on  
1412 other substantial evidence of a known  
fault? Refer to Division of Mines  
and Geology  
1413 Special Publication 42.  
1414 No Impact. Based upon the analysis  
set forth above, the Project does not  
1415 expressly authorize new development,  
and is not expected to induce growth  
or development because, due to caps  
1416 on the number that may operate,  
eligibility restrictions, and prohibitions  
1417 on the types of buildings that may be  
used, Vacation Rentals are only permitted  
on a very limited basis. As  
1418 such, the activities permitted by the  
Project would not cause a reasonably  
1419 foreseeable rupture of a known  
earthquake fault nor exacerbate existing  
environmental conditions so as to  
1420 potentially cause such rupture.

1421  
1422 ii) Strong seismic ground shaking?  
1423 No Impact. Based upon the analysis  
set forth above, the Project does  
not expressly authorize  
1424 new development, and is not expected  
to induce growth or development  
because, due to caps  
1425 on the number that may operate,  
eligibility restrictions, and  
1426 prohibitions on the types of  
buildings that may be used, Vacation  
Rentals are only permitted on a  
1427 very limited basis. As such, the  
activities permitted by the Project  
would not cause reasonably  
1428 foreseeable strong seismic ground  
shaking nor exacerbate existing  
environmental conditions

1848 Earthquake Fault Zoning  
Map issued by the State  
Geologist for the area or  
1849 based on other substantial evidence  
of a known fault? Refer to Division  
of Mines and  
1850 Geology Special Publication 42.  
1851 No Impact. Based upon the analysis  
set forth above, the  
Project does not expressly  
1852 authorize new development, and is  
not expected to induce growth or  
development because,  
1853 due to caps on the number that may  
operate, eligibility restrictions,  
and prohibitions on the  
1854 types of buildings that may be  
used, Vacation Rentals are only  
permitted on a very limited  
1855 basis. As such, the activities  
permitted by the Project would not  
1856 cause a foreseeable rupture of a  
known earthquake fault nor  
exacerbate existing environmental  
1857 conditions so as to potentially  
cause such rupture.

1858  
1859 ii) Strong seismic ground shaking?  
1860 No Impact. Based upon the analysis  
set forth above, the Project  
does not expressly  
1861 authorize new development, and is  
not expected to induce growth or  
development because,  
1862 due to caps on the number that may  
operate, eligibility restrictions,  
and prohibitions on the  
1863 types of buildings that may be  
used, Vacation Rentals are only  
permitted on a very limited  
1864 basis. As such, the activities  
permitted by the Project would  
not cause reasonably  
1865 foreseeable strong seismic ground  
shaking nor exacerbate existing  
environmental conditions

1429 existing environmental conditions so as to increase the potential to expose more people to strong seismic ground shaking.

1430

1431 iii) Seismic-related ground failure, including liquefaction?

1432 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize  
1433 new development, and is not expected to induce growth or development because, due to caps  
1434 on the number that may operate, eligibility restrictions, and prohibitions on the types of  
1435 buildings that may be used, Vacation Rentals are only permitted on a very limited basis. As  
1436 such, the activities permitted by the Project would not cause reasonably foreseeable strong  
1437 seismic ground failure, nor exacerbate existing environmental conditions so as to potentially  
1438 cause strong seismic ground failure than that of the existing residential land uses.

1439

1440 iv) Landslides?

1441 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize  
1442 new development, and is not expected to induce growth or development because, due to caps  
1443 on the number that may operate, eligibility restrictions, and prohibitions on the types of  
1444 buildings that may be used, Vacation Rentals are only permitted on a very limited basis. As such, the activities permitted by the Project would not cause reasonably foreseeable strong seismic ground failure, nor exacerbate existing environmental conditions so as to potentially cause strong seismic ground failure than that of the existing residential land uses.

1866 existing environmental conditions so as to increase the potential to expose more people to strong seismic ground shaking.

1867

1868

1869 iii) Seismic-related ground failure, including liquefaction?  
1870 No Impact. Based upon the analysis set forth above, the Project does not expressly  
1871 authorize new development, and is not expected to induce growth or development because,  
1872 due to caps on the number that may operate, eligibility restrictions, and prohibitions on the  
1873 types of buildings that may be used, Vacation Rentals are only permitted on a very limited  
1874 basis. As such, the activities permitted by the Project would not cause reasonably  
1875 foreseeable strong seismic ground failure, nor exacerbate existing environmental conditions  
1876 so as to potentially cause strong seismic ground failure than that of the existing residential  
1877 land uses.

1878

1879 iv) Landslides?

1880 No Impact. Based upon the analysis set forth above, the Project does not expressly  
1881 authorize new development, and is not expected to induce growth or development because,  
1882 due to caps on the number that may operate, eligibility restrictions, and prohibitions on the  
1883 types of buildings that may be used, Vacation Rentals are only permitted on a very limited basis. As such, the activities permitted by the Project would not cause reasonably foreseeable strong seismic ground failure, nor exacerbate existing environmental conditions so as to potentially cause strong seismic ground failure than that of the existing residential land uses.

1445 such, the activities permitted by the Project would not cause reasonably foreseeable landslides nor exacerbate existing environmental conditions so as to potentially cause landslides.

1450  
1451  
1452 Vacation Rentals Ordinance PAGE 33  
City of Los Angeles  
1453 Initial Study December 2019  
1454  
1455

1457 b) Result in substantial soil erosion or the loss of topsoil?  
1458 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize  
1459 new development, and is not expected to induce growth or development because, due to caps on  
1460 the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that  
1461 may be used, Vacation Rentals are only permitted on a very limited basis. As such, the activities  
1462 permitted by the Project are not expected to cause reasonably foreseeable physical changes to  
1463 the environment that would cause soil erosion or loss of topsoil. Therefore, no impacts related to  
1464 this issue would occur.

1465  
1466 c) Be located on a geologic unit or soil that is unstable or that wo

1884 used, vacation rentals are only permitted on a very limited basis. As such, the activities permitted by the Project would not cause reasonably foreseeable landslides nor exacerbate existing environmental conditions so as to potentially cause landslides.

1889  
1890  
1891 Vacation Rentals Ordinance PAGE 39  
City of Los Angeles  
1892 Initial Study June 2020  
1893  
1894

1896 b) Result in substantial soil erosion or the loss of topsoil?  
1897 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize  
1898 new development, and is not expected to induce growth or development because, due to caps  
1899 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings  
1900 that may be used, Vacation Rentals are only permitted on a very limited basis. As such, the  
1901 activities permitted by the Project are not expected to cause reasonably foreseeable physical  
1902 changes to the environment that would cause soil erosion or loss of topsoil. Therefore, no  
1903 impacts related to this issue would occur.

1904  
1905 c) Be located on a geologic unit or soil that is unstable or that wo

1467 soil that is unstable, or that would become unstable as  
1467 a result of the project, and potentially result in on- or off-site landslide, lateral spreading,  
1468 subsidence, liquefaction, or collapse?  
1469 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize  
1470 new development, and is not expected to induce growth or development because, due to caps on  
1471 the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that  
1472 may be used, Vacation Rentals are only permitted on a very limited basis. As such, the activities  
1473 permitted by the Project would not cause soil to become unstable resulting in reasonably  
1474 foreseeable on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse nor  
1475 exacerbate existing environmental conditions so as to potentially cause these geological events.

1476  
1477 d) Be located on expansive soil, as defined in Table 18.1 B of the Uniform Building Code

1478 (1994), creating substantial direct or indirect risks to life or property?

1479 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1480 new development, and is not expected to induce growth or development because, due to caps on

1481 the number that may operate, eligibility restrictions, and prohibitions

1906 soil that is unstable, or that would become unstable  
1906 as a result of the project, and potentially result in on- or off-site landslide, lateral  
1907 spreading, subsidence, liquefaction, or collapse?

1908 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1909 new development, and is not expected to induce growth or development because, due to caps

1910 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

1911 that may be used, Vacation Rentals are only permitted on a very limited basis. As such, the

1912 activities permitted by the Project would not cause soil to become unstable resulting in

1913 reasonably foreseeable on- or off-site landslides, lateral spreading, subsidence, liquefaction

1914 collapse nor exacerbate existing environmental conditions so as to potentially cause these

1915 geological events.

1916  
1917 d) Be located on expansive soil, as defined in Table 18.1 B of the Uniform Building Code

1918 (1994), creating substantial direct or indirect risks to life or property?

1919 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1920 new development, and is not expected to induce growth or development because, due to caps

1921 on the number that may operate, eligibility restrictions, and prohibitions

1482 may be used, Vacation Rentals are o  
1483 nly permitted on a very limited  
1484 basis. As such, the activities  
1485 permitted by the Project would  
1486 not cause soil to become unsta  
1487 ble resulting in reasonably  
1488 foreseeable exacerbation of the  
1489 existing expansive soil conditions.  
1490 Therefore, no related impacts  
1491 would occur.

1492 e) Have soils incapable of a  
1493 adequately supporting the use of  
1494 septic tanks or alternative  
1495 wastewater disposal systems w  
1496 here sewers are not availab  
1497 le for the disposal of

1498 wastewater?  
1499 No Impact. Based upon the analysis  
1500 set forth above, the Project does n  
1501 ot expressly authorize  
1502 new development, and is not expecte  
1503 d to induce growth or development b  
1504 ecause, due to caps

1505 on the number that may operate, eli  
1506 gibility restrictions, and prohibit  
1507 ions on the types of buildings

1508 that may be used, Vacation Rentals  
1509 are only permitted on a very  
1510 limited basis. As such, the

1511 activities permitted by the  
1512 proposed ordinance would not involv  
1513 e the use of septic tanks or

1514 alternative wastewater disposal  
1515 systems. Thus, the Project would no  
1516 t result in any impacts

1517 related to soils that are incapable  
1518 of adequately supporting the use of  
1519 septic tanks or alternative

1520 wastewater disposal systems where s

1922 gibility restrictions, and prohibi  
1923 tions on the types of buildings  
1924 that may be used, Vacation Ren  
1925 tals are only permitted on a  
1926 very limited basis. As such,  
1927 the

1928 activities permitted by the Proj  
1929 ect would not cause soil to be  
1930 come unstable resulting in  
1931 reasonably foreseeable  
1932 exacerbation of the existing ex  
1933 pansive soil conditions. Therefo  
1934 re, no  
1935 related impacts would occur.

1936 e) Have soils incapable of a  
1937 adequately supporting the use of  
1938 septic tanks or alternative  
1939 wastewater disposal systems w  
1940 here sewers are not availab  
1941 le for the disposal of

1942 wastewater?  
1943 No Impact. Based upon the analysis  
1944 set forth above, the Project does n  
1945 ot expressly authorize  
1946 new development, and is not expecte  
1947 d to induce growth or development b  
1948 ecause, due to caps

1949 on the number that may operate, eli  
1950 gibility restrictions, and prohibit  
1951 ions on the types of buildings

1952 that may be used, Vacation Ren  
1953 tals are only permitted on a  
1954 very limited basis. As such, t  
1955 he

1956 activities permitted by the  
1957 proposed ordinance would not inv  
1958 olve the use of septic tanks  
1959 or

1960 alternative wastewater disposal  
1961 systems. Thus, the Project would  
1962 not result in any impacts

1963 related to soils that are incapable  
1964 of adequately supporting the use of  
1965 septic tanks or alternative

1966 wastewater disposal systems where s

1497 wastewater disposal systems where s  
ewers are not available for the dis  
posal of wastewater.  
1498 Therefore, no impacts related to th  
is issue would occur.

1499  
1500

1501  
1502  
1503 Vacation Rentals Ordinance PAGE 34  
City of Los Angeles  
1504 Initial Study December 2019

1505  
1506  
1507  
1508  
1509

1510 VIII. GREENHOUSE GAS EMISSIONS  
1511  
1512  
1513  
1514  
1515

1516 Potentially  
  
1517 Significant  
1518 Impact  
1519 Less Than  
1520 Significant  
1521 with  
1522 Mitigation  
1523 Incorporated  
1524 Less Than  
1525 Significant  
1526 Impact No Impact

1527 Would the project:  
1528  
  
1529 a. Generate greenhouse gas

1937  
1938

1939  
1940  
1941 Vacation Rentals Ordinance PAGE 40  
City of Los Angeles  
1942 Initial Study June 2020

1943  
1944  
1945 wastewater disposal systems where  
sewers are not available for t  
he disposal of wastewater.  
1946 Therefore, no impacts related to th  
is issue would occur.

1947  
1948  
1949

1950 VIII. GREENHOUSE GAS EMISSIONS  
1951  
1952  
1953  
1954  
1955

1956 Potentially  
  
1957 Significant  
1958 Impact  
1959 Less Than  
1960 Significant  
1961 with  
1962 Mitigation  
1963 Incorporated  
1964 Less Than  
1965 Significant  
1966 Impact No Impact

1967 Would the project:  
1968  
  
1969 a. Generate greenhouse gas  
emissions, either  
1970 directly or indirectly that ma

1971  
1972  
1973  
1974  
1975  
1976  
1977  
1978  
1979  
1980

1529 a) Generate greenhouse gas  
emissions, either

1530 directly or indirectly, that ma  
y have a significant

1531 impact on the environment?

1532

1533 b. Conflict with an applicable plan  
, policy or regulation

1534 adopted for the purpose of reducing  
the emissions

1535 of greenhouse gases?

1536

1537

1538

1539

1540

1541 Vacation Rentals Ordinance PAGE 35  
City of Los Angeles

1542 Initial Study December 2019

1543

1544

1545

1546 a) Generate greenhouse gas em  
issions, either directly or ind  
irectly, that may have a

1547 significant impact on the environme  
nt?

1548 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize

1549 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps on

1550 the number that may operate, eligib  
ility restrictions, and prohibitions  
on the types of buildings that

1551 may be used, Vacation Rentals are o  
nly permitted on a very limited bas  
is. For the reasons set

1552 forth above, it is not anticipated  
the Project will result in an incre  
ase in use of residences so as to

1553 increase use of energy above le  
existing use levels an increase  
in traffic or a change in  
traffic

1554 patterns that would increase or cha

1529 directly or indirectly, that ma  
y have a significant

1531 impact on the environment?

1532

1533 b. Conflict with an applic  
able plan, policy or

1534 regulation adopted for the purp  
ose of reducing

1535 the emissions of greenhouse gases?

1536

1537

1538

1539

1540

1541 Vacation Rentals Ordinance PAGE 41  
City of Los Angeles

1542 Initial Study June 2020

1543

1544

1545

1546 a) Generate greenhouse gas em  
issions, either directly or ind  
irectly, that may have a

1547 significant impact on the environme  
nt?

1548 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize

1549 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps

1550 on the number that may operate, eli  
gibility restrictions, and prohibiti  
ons on the types of buildings

1551 that may be used, Vacation Rentals  
are only permitted on a very limite  
d basis. For the reasons

1552 set forth above, it is not anticipa  
ted the Project will result in an i  
ncrease in use of residences so as

1553 as to increase use of energy above  
existing use levels an increase  
in traffic or a change in traffic

1554 patterns that would increase or cha

1554 patterns that would increase or change vehicle emissions from existing conditions. Accordingly,  
1555 short-term rental activities permitted by this Project will not cause an increase in cumulative  
1556 greenhouse gas emissions.  
1557  
1558 b) Conflict with an applicable plan, policy or regulation adopted for the purpose of  
1559 reducing the emissions of greenhouse gases?  
1560 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize  
1561 new development, and is not expected to induce growth or development because, due to caps on  
1562 the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that  
1563 may be used, Vacation Rentals are only permitted on a very limited basis. For the reasons set  
1564 forth above, it is not anticipated the Project will result in an increase in use of residences so as to  
1565 increase use of energy above existing use levels, an increase in traffic or a change in traffic  
1566 patterns that would increase or change vehicle emissions from existing conditions. Accordingly,  
1567 short-term rental activities permitted by this Project will not conflict with an applicable plan, policy,  
1568 or regulation adopted for the purposes of reducing greenhouse gases.

1569  
1570  
1571  
1572

1993 patterns that would increase or change vehicle emissions from existing conditions. Accordingly,  
1994 short-term rental activities permitted by this Project will not cause an increase in cumulative  
1995 greenhouse gas emissions.  
1996  
1997 b) Conflict with an applicable plan, policy or regulation adopted for the purpose of  
1998 reducing the emissions of greenhouse gases?  
1999 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize  
2000 new development, and is not expected to induce growth or development because, due to caps  
2001 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings  
2002 that may be used, Vacation Rentals are only permitted on a very limited basis. For the reasons  
2003 set forth above, it is not anticipated the Project will result in an increase in use of residences so  
2004 as to increase use of energy above existing use levels, an increase in traffic or a change in  
2005 traffic patterns that would increase or change vehicle emissions from existing conditions.  
2006 Accordingly, short-term rental activities permitted by this Project will not conflict with an  
2007 applicable plan, policy, or regulation adopted for the purposes of reducing greenhouse gases.

2008  
2009  
2010  
2011

1573  
1574  
1575 Vacation Rentals Ordinance PAGE 36  
City of Los Angeles  
1576 Initial Study December 2019  
1577  
1578  
1579 IX. HAZARDS AND HAZARDOUS MATERIAL  
S  
1580  
1581  
1582  
1583  
1584  
1585 Potentially  
1586 Significant  
1587 Impact  
1588 Less Than  
1589 Significant  
1590 with  
  
1591 Mitigation  
1592 Incorporated  
1593 Less Than  
1594 Significant  
1595 Impact  
1596 No Impact  
1597 Would the project:  
  
1598  
1599 a. Create a significant hazard  
to the public or the  
1600 environment through the routine tra  
nsport, use, or  
1601 disposal of hazardous materials?  
1602  
1603 b. Create a significant hazard  
to the public or the  
1604 environment through reasonably  
foreseeable  
1605 upset and accident conditions

2012  
2013  
2014 Vacation Rentals Ordinance PAGE 42  
City of Los Angeles  
2015 Initial Study June 2020  
2016  
2017  
2018 IX. HAZARDS AND HAZARDOUS MATERIAL  
S  
2019  
2020  
2021  
2022  
2023  
2024 Potentially  
2025 Significant  
2026 Impact  
2027 Less Than  
2028 Significant  
2029 with  
  
2030 Mitigation  
2031 Incorporated  
2032 Less Than  
2033 Significant  
2034 Impact No Impact  
2035 Would the project:  
2036 a. Create a significant hazard  
to the public or the  
2037 environment through the routine  
transport, use,  
2038 or disposal of hazardous materials?  
2039  
2040 b. Create a significant hazard  
to the public or the  
2041 environment through reasonably  
foreseeable  
2042 upset and accident conditions  
involving the  
2043 release of hazardous mater  
ials into the

1605 upset and accident conditions  
involving the [redacted]  
1606 release of hazardous mater  
ials into the [redacted]

1607 environment?

1608

1609 c. Emit hazardous emissions or  
handle hazardous or  
1610 acutely hazardous materials,  
substances, or  
1611 waste within one-quarter mile o  
f an existing or [redacted]

1612 proposed school?

1613

1614 d. Be located on a site which is in  
cluded on a list of

1615 hazardous materials sites compil  
ed pursuant to [redacted]

1616 Government Code Section 65962.5  
and, as a [redacted]

1617 result, would create a signific  
ant hazard to the [redacted]

1618 public or the environment?

1619

1620 e. For a project located within  
an airport land use [redacted]

1621 plan or, where such a plan has not  
been adopted,

1622 within two miles of a [redacted] public  
airport or [redacted] public use

1623 airport, would the project result  
in a safety hazard

1624 or excessive noise for people resid  
ing or working

1625 in the project area?

1626

1627 f. Impair implementation of or  
physically interfere

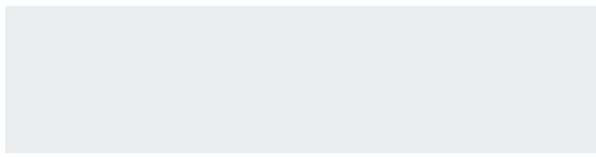
1628 with an adopted emergency respo  
nse plan or [redacted]

1629 emergency evacuation plan?

1630

1631 g. Expose people or structures,  
either directly or [redacted]

1632 indirectly to a significant ris



2044 environment?

2045

2046 c. Emit hazardous emissions or  
handle hazardous  
2047 or acutely hazardous materials,  
substances, or  
2048 waste within one-quarter mile o  
f an existing or

2049 proposed school?

2050

2051 d. Be located on a site which is in  
cluded on a list of

2052 hazardous materials sites compil  
ed pursuant to

2053 Government Code Section 65962.5  
and, as a

2054 result, would create a signific  
ant hazard to the

2055 public or the environment?

2056

2057 e. For a project located within  
an airport land use

2058 plan or, where such a pla  
n has not been

2059 adopted, within two miles of a  
public airport or

2060 public use airport, would the  
project result in a

2061 safety hazard or excessive  
noise for people

2062 residing or working in the project  
area?

2063

2064 f. Impair implementation of or  
physically interfere

2065 with an adopted emergency respo  
nse plan or

2066 emergency evacuation plan?

2067

2068 g. Expose people or structures,  
either directly or

2069 indirectly to a significant ris

1632 indirectly, to a significant ris  
k of loss, injury or  
1633 death involving wildland fires?  
1634  
1635  
1636  
1637  
1638  
1639  
1640  
1641  
1642 Vacation Rentals Ordinance PAGE 37  
City of Los Angeles  
1643 Initial Study December 2019  
1644  
1645  
1646 a) Create a significant hazar  
d to the public or the enviro  
nment through the routine  
1647 transport, use, or disposal of haza  
rdous materials?  
1648 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize  
1649 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps on  
1650 the number that may operate, eligib  
ility restrictions, and prohibition  
s on the types of buildings that  
1651 may be used, Vacation Rentals are o  
nly permitted on a very limited bas  
is. Furthermore, it is not  
1652 reasonably foreseeable that the act  
ivities permitted by the Project wo  
uld involve routine transport,  
1653 use, or disposal of hazardous mater  
ials. Therefore, no impacts related  
to this issue would occur.  
1654  
1655 b) Create a significant hazar  
d to the public or the enviro  
nment through reasonably  
1656 foreseeable, upset, and accident

2070 indirectly, to a significant ris  
k of loss, injury or  
2071 death involving wildland fires?  
2072  
2073  
2074  
2075  
2076  
2077  
2078  
2079 Vacation Rentals Ordinance PAGE 43  
City of Los Angeles  
2080 Initial Study June 2020  
2081  
2082  
2083 a) Create a significant hazar  
d to the public or the enviro  
nment through the routine  
2084 transport, use, or disposal of haza  
rdous materials?  
2085 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize  
2086 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps  
2087 on the number that may operate, eli  
gibility restrictions, and prohibit  
ions on the types of buildings  
2088 that may be used, Vacation Rentals  
are only permitted on a very limite  
d basis. Furthermore, it is  
2089 not reasonably foreseeable that  
the activities permitted by the  
Project would involve routine  
2090 transport, use, or disposal of  
hazardous materials. Therefore,  
no impacts related to this iss  
ue  
2091 would occur.  
2092  
2093 b) Create a significant hazar  
d to the public or the enviro  
nment through reasonably  
2094 foreseeable, upset, and accident

1656 foreseeable upset and accident conditions involving the release of hazardous materials

1657 into the environment?

1658 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1659 new development, and is not expected to induce growth or development because, due to caps

1660 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

1661 that may be used, Vacation Rentals are only permitted on a very limited basis. No excavation or

1662 construction-related activities are anticipated to occur which could result in the release of

1663 hazardous materials into the environment. Users of short-term rentals are not expected to use

1664 hazardous materials other than typical small quantities of household hazardous materials, such

1665 as cleaning agents, and these would not be expected to result in impacts over any existing from

1666 current uses and baseline conditions. Therefore, no impacts related to this issue would occur.

1667 c) Emit hazardous emissions or handle hazardous or acutely hazardous materials,

1668 substances, or waste within one-quarter mile of an existing or proposed school?

1669 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1670 new development, and is not expected to induce growth or development because, due to caps

1671 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

2094 foreseeable upset and accident conditions involving the release of hazardous materials

2095 into the environment?

2096 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

2097 new development, and is not expected to induce growth or development because, due to caps

2098 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

2099 that may be used, Vacation Rentals are only permitted on a very limited basis. No excavation or

2100 construction-related activities are anticipated to occur which could result in the release of

2101 hazardous materials into the environment. Users of short-term rentals are not expected to use

2102 hazardous materials other than typical small quantities of household hazardous materials, such

2103 as cleaning agents, and these would not be expected to result in impacts over any existing from

2104 current uses and baseline conditions. Therefore, no impacts related to this issue would occur.

2105 c) Emit hazardous emissions or handle hazardous or acutely hazardous materials,

2106 substances, or waste within one-quarter mile of an existing or proposed school?

2107 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

2108 new development, and is not expected to induce growth or development because, due to caps

2109 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

ions on the types of buildings

1672 that may be used, Vacation Rentals  
are only permitted on a very limited  
basis. As discussed

1673 above, the Project does not involve  
the emission or handling of hazardous  
materials. Therefore,

1674 no impacts related to this issue would  
occur.

1675 d) Be located on a site which is included  
on a list of hazardous materials sites  
compiled

1676 pursuant to Government Code Section  
65962.5 and, as a result, would it  
create a

1677 significant hazard to the public or  
the environment?

1678 No Impact. Based upon the analysis  
set forth above, the Project does not  
expressly authorize

1679 new development, and is not expected  
to induce growth or development because,  
due to caps

1680 on the number that may operate, eligibility  
restrictions, and prohibitions on the  
types of buildings

1681 that may be used, Vacation Rentals  
are only permitted on a very limited  
basis. The activities

1682 permitted by the Project would not  
result in short-term rental uses occurring  
on sites other than

1683 existing residential dwellings. As such,  
the Project would not increase the  
number of residences

1684 located on the above described lists  
from current conditions. As such,  
it is not reasonably

1685 foreseeable that impacts related to  
this issue would occur.

1686

1687

1688

1689

ions on the types of buildings

2110 that may be used, Vacation Rentals  
are only permitted on a very limited  
basis. As discussed

2111 above, the Project does not involve  
the emission or handling of hazardous  
materials. Therefore,

2112 no impacts related to this issue would  
occur.

2113 d) Be located on a site which is included  
on a list of hazardous materials sites  
compiled

2114 pursuant to Government Code Section  
65962.5 and, as a result, would it  
create a

2115 significant hazard to the public or  
the environment?

2116 No Impact. Based upon the analysis  
set forth above, the Project does not  
expressly authorize

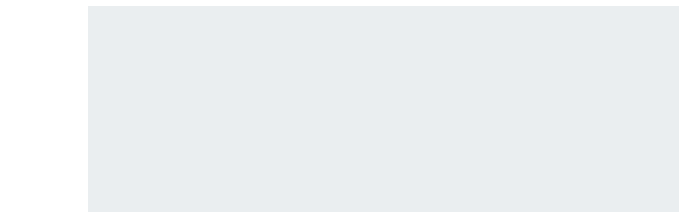
2117 new development, and is not expected  
to induce growth or development because,  
due to caps

2118 on the number that may operate, eligibility  
restrictions, and prohibitions on the  
types of buildings

2119 that may be used, Vacation Rentals  
are only permitted on a very limited  
basis. The activities

2120 permitted by the Project would not  
result in short-term rental uses occurring  
on sites other than

2121 existing residential dwellings. As such,  
the Project would not increase the  
number of residences



2122

2123

2124

2125

1690 Vacation Rentals Ordinance PAGE 38  
City of Los Angeles  
1691 Initial Study December 2019  
1692  
1693  
1694 e) For a project located within an  
airport land use plan or, where suc  
h a plan has not been  
1695 adopted, within two miles of a publ  
ic airport or public use airport, w  
ould the project result  
1696 in a safety hazard or excessive noi  
se for people residing or working i  
n the project area?

1697 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize  
1698 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps

1699 on the number that may operate, eli  
gibility restrictions, and prohibit  
ions on the types of buildings  
1700 that may be used, Vacation Rentals  
are only permitted on a very limite  
d basis. Therefore, no

1701 impacts related to this issue would  
occur.  
1702 f) Impair implementation of or phy  
sically interfere with an adopted e  
mergency response

1703 plan or emergency evacuation plan?  
1704 No Impact. Based upon the analysis

set forth above, the Project only a  
ffects the use of existing  
1705 residential structures in establ

2126 Vacation Rentals Ordinance PAGE 44  
City of Los Angeles  
2127 Initial Study June 2020  
2128  
2129  
2130 located on the above described  
lists from current conditions.  
As such, it is not reasonably  
2131 foreseeable that impacts related to  
this issue would occur.

2132 e) For a project located wit  
hin an airport land use plan  
or, where such a plan has not  
2133 been adopted, within two miles of a  
public airport or public use airpor  
t, would the project  
2134 result in a safety hazard or excess  
ive noise for people residing or wo  
rking in the project  
2135 area?

2136 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize  
2137 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps

2138 on the number that may operate, eli  
gibility restrictions, and prohibit  
ions on the types of buildings  
2139 that may be used, Vacation Ren  
tals are only permitted on a  
very limited basis. Therefore, n  
o

2140 impacts related to this issue would  
occur.  
2141 f) Impair implementation of or phy  
sically interfere with an adopted e  
mergency response

2142 plan or emergency evacuation plan?  
2143 No Impact. Based upon the analysis

set forth above, the Project only a  
ffects the use of existing  
2144 residential structures in establ

1705 residential structures in estab-  
lished neighborhoods, and no new  
development is authorized or  
1706 reasonably foreseeable. No aspects  
of this Project would inhibit acces  
s to hospitals, emergency  
1707 response centers, school locations,  
communication facilities, highways  
and bridges, or airports.  
1708 Thus, no impacts related to this is  
sue would occur.

1709  
1710 g) Expose people or structures,  
either directly or indirectly, to  
a significant risk of loss,  
1711 injury or death involving wildland  
fires?  
1712 No Impact. Based upon the analysis  
set forth above, the Project only a  
ffects the use of existing

1713 residential structures in establish  
ed neighborhoods, and no new develo  
pment is authorized or  
1714 reasonably foreseeable. There is no  
reasonably foreseeable increased ri  
sks involving wildland  
1715 fires. Therefore, no impacts relate  
d to this issue would occur.

1716  
1717 X. HYDROLOGY AND WATER QUALITY

1718  
1719  
1720  
1721  
1722  
1723 Potentially  
1724 Significant  
1725 Impact  
1726 Less Than  
1727 Significant  
1728 with  
1729 Mitigation  
1730 Incorporated  
1731 Less Than  
1732 Significant

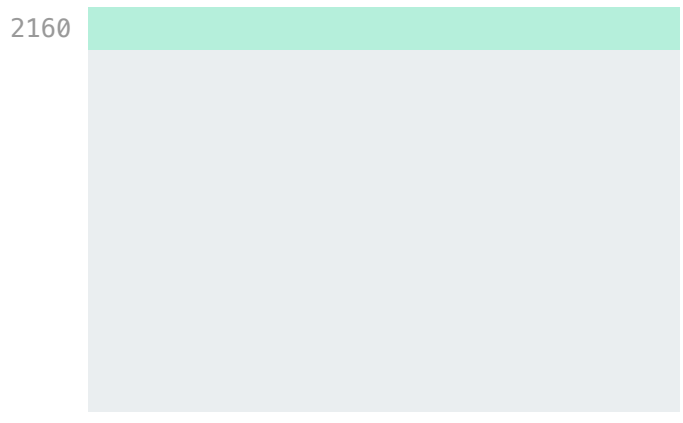
2144 residential structures in estab-  
lished neighborhoods, and no new  
development is authorized or  
2145 reasonably foreseeable. No aspects  
of this Project would inhibit acces  
s to hospitals, emergency  
2146 response centers, school locations,  
communication facilities, highways  
and bridges, or airports.  
2147 Thus, no impacts related to this is  
sue would occur.

2148  
2149 g) Expose people or structures,  
either directly or indirectly, to  
a significant risk of loss,  
2150 injury or death involving wildland  
fires?  
2151 No Impact. Based upon the analysis  
set forth above, the Project only a  
ffects the use of existing

2152 residential structures in establ  
ished neighborhoods, and no new  
development is authorized or  
2153 reasonably foreseeable. There is  
no reasonably foreseeable  
increased risks involving  
2154 fires. Therefore, no impacts relate  
d to this issue would occur.



2155  
2156  
2157  
2158  
2159



1732 Significant  
1733 Impact No Impact  
1734 Would the project:  
1735  
1736 a. Violate any water quality  
standards or waste  
1737 discharge requirements or otherwise  
substantially  
1738 degrade surface or ground water qua  
lity?  
1739  
1740 b. Substantially decrease groundwat  
er supplies or  
1741 interfere substantially with gro  
undwater recharge  
1742 such that the project may impe  
de sustainable  
1743 groundwater management of the basin  
?  
1744

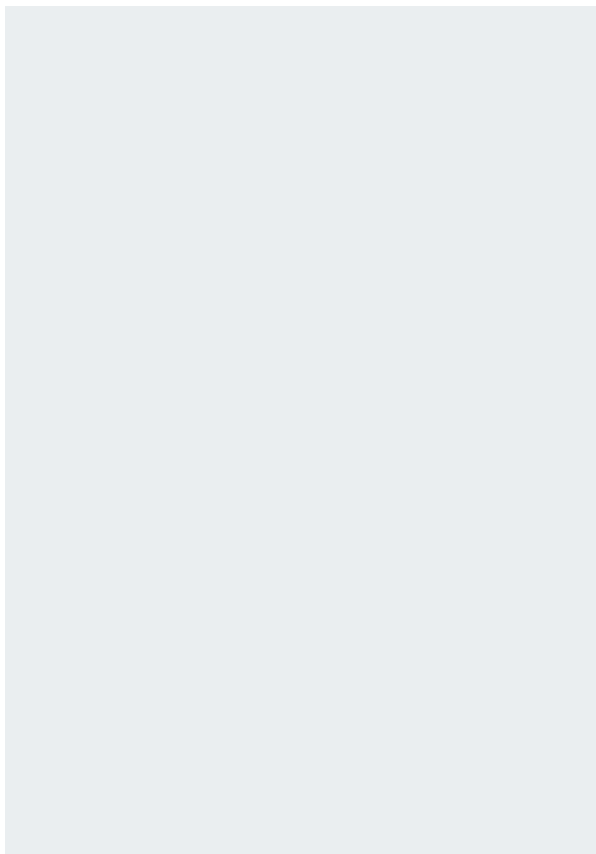
1745  
1746  
1747  
1748  
1749 Vacation Rentals Ordinance PAGE 39  
City of Los Angeles  
1750 Initial Study December 2019  
1751  
1752

1753  
1754  
1755  
1756  
1757

1758 Potentially  
1759 Significant  
1760 Impact  
1761 Less Than  
1762 Significant  
1763 with  
1764 Mitigation  
1765 Incorporated  
1766 Less Than

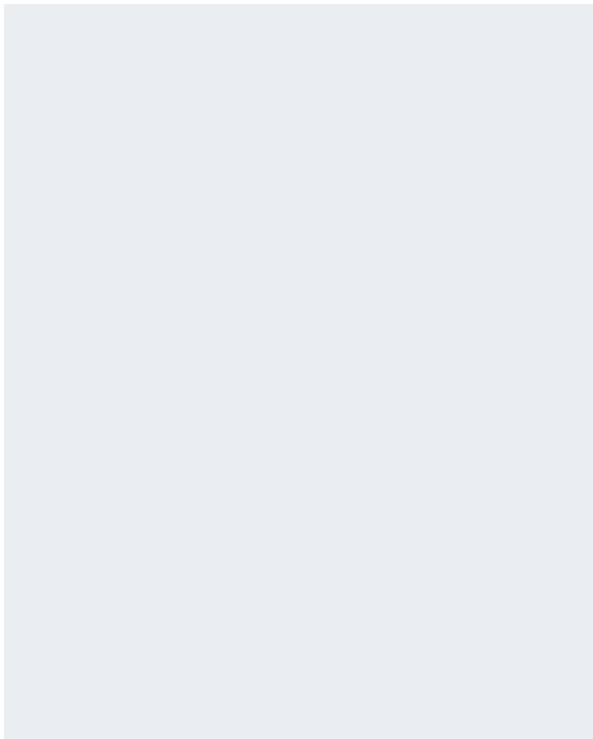
2161  
2162  
2163  
2164  
2165  
2166  
2167  
2168  
2169  
2170  
2171  
2172  
2173  
2174

2175 Potentially  
2176 Significant  
2177 Impact  
2178 Less Than  
2179 Significant  
2180 with  
2181 Mitigation  
2182 Incorporated  
2183 Less Than



2163  
2164  
2165 Vacation Rentals Ordinance PAGE 45  
City of Los Angeles  
2166 Initial Study June 2020  
2167  
2168  
2169 X. HYDROLOGY AND WATER QUALITY

1766 Less than  
1767 Significant  
1768 Impact No Impact



1769 c. Substantially alter the existing  
1770 drainage pattern of  
1771 the site or area, including through  
1772 the alteration of  
1773 the course of a stream or riv  
1774 er or through the  
1775 addition of impervious surfaces, in  
1776 a manner which  
1777 would:  
1778 i. Result in substantial erosion  
1779 or siltation  
1780 on- or off-site;  
1781 ii. Substantially increase the ra  
1782 te or amount  
1783 of surface runoff in a manner which  
1784 would  
1785 result in flooding on- or off-site;  
1786 iii. Create or contribute runoff  
1787 water which  
1788 would exceed the capacity of existi  
1789 ng or  
1790 planned stormwater drainage systems  
1791 or  
1792 provide substantial additional sour  
1793 ces of  
1794 polluted runoff; or

2183 Less than  
2184 Significant  
2185 Impact No Impact  
2186 Would the project:  
2187 a. Violate any water quality  
2188 standards or waste  
2189 discharge requirements or otherwise  
2190 substantially  
2191 degrade surface or ground water qua  
2192 lity?  
2193 b. Substantially decrease groundwat  
2194 er supplies or  
2195 interfere substantially with gro  
2196 undwater recharge  
2197 such that the project may imped  
2198 e sustainable  
2199 groundwater management of the basin  
2200 ?  
2201 c. Substantially alter the existing  
2202 drainage pattern of  
2203 the site or area, including through  
2204 the alteration of  
2205 the course of a stream or riv  
2206 er or through the  
2207 addition of impervious surfac  
2208 es, in a manner  
2209 which would:  
2210 i. Result in substantial erosion  
2211 or siltation  
2212 on- or off-site;  
2213 ii. Substantially increase the rate  
2214 or amount  
2215 of surface runoff in a manner which  
2216 would  
2217 result in flooding on- or off-site;  
2218 iii. Create or contribute runoff  
2219 water which  
2220 would exceed the capacity of  
2221 existing or  
2222 planned stormwater drainage  
2223 systems or  
2224 provide substantial additional s  
2225 ources of  
2226 polluted runoff; or

1783 polluted runoff, or  
1784 iv. Impede or redirect flood flows?  
1785  
1786 d. In flood hazard, tsunami, or seiche zones, risk  
1787 release of pollutants due to project inundation?  
1788  
1789 e. Conflict with or obstruct implementation of a water  
1790 quality control plan or sustainable groundwater  
1791 management plan?  
1792  
1793  
1794  
1795  
1796  
1797  
1798  
1799 Vacation Rentals Ordinance PAGE 40  
City of Los Angeles  
1800 Initial Study December 2019  
1801  
1802  
1803 a) Violate any water quality standards or waste discharge requirements or otherwise  
1804 substantially degrade surface or groundwater quality?  
1805 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize  
1806 new development, and is not expected to induce growth or development because, due to caps on  
1807 the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that  
1808 may be used, Vacation Rentals are only permitted on a very limited basis. Therefore, it would  
1809 have no impact on water quality standards or waste discharge and would

2210 polluted runoff, or  
2211 iv. Impede or redirect flood flows?  
2212  
2213 d. In flood hazard, tsunami, or seiche zones, risk  
2214 release of pollutants due to project inundation?  
2215  
2216 e. Conflict with or obstruct implementation of a water  
2217 quality control plan or sustainable groundwater  
2218 management plan?  
2219  
2220  
2221  
2222  
2223  
2224  
2225  
2226 Vacation Rentals Ordinance PAGE 46  
City of Los Angeles  
2227 Initial Study June 2020  
2228  
2229  
2230 a) Violate any water quality standards or waste discharge requirements or otherwise  
2231 substantially degrade surface or groundwater quality?  
2232 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize  
2233 new development, and is not expected to induce growth or development because, due to caps  
2234 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings  
2235 that may be used, Vacation Rentals are only permitted on a very limited basis. Therefore, it  
2236 would have no impact on water quality standards or waste discharge and would

1810 standards of waste discharge and would  
not violate any water  
quality standards or waste discharge  
requirements.

1811

1812 b) Substantially decrease groundwater  
supplies or interfere substantially with  
1813 groundwater recharge such that  
the project may impede sustainable  
groundwater

1814 management of the basin?

1815 No Impact. Based upon the analysis  
set forth above, the Project does not  
expressly authorize

1816 new development, and is not expected  
to induce growth or development because,  
due to caps

1817 on the number that may operate, eligibility  
restrictions, and prohibitions on the types  
of buildings

1818 that may be used, Vacation Rentals are  
only permitted on a very limited basis.  
Within the City, it

1819 is not expected that Vacation Rentals  
would result in a significant increase in  
water usage or

1820 have an impact on groundwater supplies.

1821

1822 c) Substantially alter the existing  
drainage pattern of the site or area,  
including through

1823 the alteration of the course of a stream  
or river or through the addition of  
impervious

1824 surfaces, in a manner which would:

1825 i. Result in substantial erosion or  
siltation on- or off-site;

1826 No Impact. Based upon the analysis  
set forth above, the Project does not  
expressly

1827 authorize new development, and is not  
expected to induce growth or dev

2237 standards of waste discharge and  
would not violate any  
water quality standards or waste discharge  
requirements.

2238

2239 b) Substantially decrease groundwater  
supplies or interfere substantially with  
2240 groundwater recharge such that  
the project may impede sustainable  
groundwater

2241 management of the basin?

2242 No Impact. Based upon the analysis  
set forth above, the Project does not  
expressly authorize

2243 new development, and is not expected  
to induce growth or development because,  
due to caps

2244 on the number that may operate, eligibility  
restrictions, and prohibitions on the types  
of buildings

2245 that may be used, Vacation Rentals are  
only permitted on a very limited basis.  
Within the City, it

2246 is not expected that Vacation  
Rentals would result in a significant  
increase in water usage or

2247 have an impact on groundwater supplies.

2248

2249 c) Substantially alter the existing  
drainage pattern of the site or area,  
including through

2250 the alteration of the course of a  
stream or river or through the addition  
of impervious

2251 surfaces, in a manner which would:

2252 i. Result in substantial erosion or  
siltation on- or off-site;

2253 No Impact. Based upon the analysis  
set forth above, the Project does not  
expressly

2254 authorize new development, and is not  
expected to induce growth or dev

1828 because, due to caps on the number that may operate, eligibility restrictions, and  
1829 prohibitions on the types of buildings that may be used, Vacation Rentals are only  
1830 permitted on a very limited basis. Therefore, it would have no impact on existing  
1831 drainage patterns.  
1832 ii. Substantially increase the rate or amount of surface runoff in a manner which  
1833 would result in flooding on- or off-site;  
1834 No Impact. Based upon the analysis set forth above, the Project does not expressly  
1835 authorize new development, and is not expected to induce growth or development  
1836 because, due to caps on the number that may operate, eligibility restrictions, and  
1837 prohibitions on the types of buildings that may be used, Vacation Rentals are only  
1838 permitted on a very limited basis. Therefore, it would have no impact on runoff water  
1839 which would exceed the capacity of existing or planned stormwater drainage systems.  
1840 iii. Create or contribute runoff water which would exceed the capacity of existing or  
1841 planned stormwater drainage systems or provide substantial additional sources  
1842 of polluted runoff; or  
1843  
1844  
1845  
1846

2255 because, due to caps on the number that may operate, eligibility restrictions, and  
2256 prohibitions on the types of buildings that may be used, Vacation Rentals are only  
2257 permitted on a very limited basis. Therefore, it would have no impact on existing  
2258 drainage patterns.  
2259 ii. Substantially increase the rate or amount of surface runoff in a manner which  
2260 would result in flooding on- or off-site;  
2261 No Impact. Based upon the analysis set forth above, the Project does not expressly  
2262 authorize new development, and is not expected to induce growth or development  
2263 because, due to caps on the number that may operate, eligibility restrictions, and  
2264 prohibitions on the types of buildings that may be used, Vacation Rentals are only  
2265 permitted on a very limited basis. Therefore, it would have no impact on runoff water  
2266 which would exceed the capacity of existing or planned stormwater drainage systems.  
2267 iii. Create or contribute runoff water which would exceed the capacity of existing or  
2268 planned stormwater drainage systems or provide substantial additional sources  
2269 of polluted runoff; or  
2270  
2271  
2272

1847 Vacation Rentals Ordinance PAGE 41  
City of Los Angeles

1848 Initial Study December 2019

1849

1850

1851 No Impact. Based upon the analysis set forth above, the Project does not expressly

1852 authorize new development, and is not expected to induce growth or development

1853 because, due to caps on the number that may operate, eligibility restrictions, and

1854 prohibitions on the types of buildings that may be used, Vacation Rentals are only

1855 permitted on a very limited basis. Therefore, it would have no impact on runoff water

1856 which would exceed the capacity of existing or planned stormwater drainage systems.

1857 iv. Impede or redirect flood flows?

1858 No Impact. Based upon the analysis set forth above, the Project does not expressly

1859 authorize new development, and is not expected to induce growth or development

1860 because, due to caps on the number that may operate, eligibility restrictions, and

1861 prohibitions on the types of buildings that may be used, Vacation Rentals are only

1862 permitted on a very limited basis. Therefore, no impacts related to this issue would occur

1863

1864

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project

2274 Vacation Rentals Ordinance PAGE 47  
City of Los Angeles

2275 Initial Study June 2020

2276

2277

2278 No Impact. Based upon the analysis set forth above, the Project does not expressly

2279 authorize new development, and is not expected to induce growth or development

2280 because, due to caps on the number that may operate, eligibility restrictions, and

2281 prohibitions on the types of buildings that may be used, Vacation Rentals are only

2282 permitted on a very limited basis. Therefore, it would have no impact on runoff water

2283 which would exceed the capacity of existing or planned stormwater drainage systems.

2284 iv. Impede or redirect flood flows?

2285 No Impact. Based upon the analysis set forth above, the Project does not expressly

2286 authorize new development, and is not expected to induce growth or development

2287 because, due to caps on the number that may operate, eligibility restrictions, and

2288 prohibitions on the types of buildings that may be used, Vacation Rentals are only

2289 permitted on a very limited basis. Therefore, no impacts related to this issue would occur

2290

2291

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project

1865 inundation?  
1866 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize  
1867 new development, and is not expected to induce growth or development because, due to caps  
1868 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings  
1869 that may be used, Vacation Rentals are only permitted on a very limited basis. There is no  
1870 potential to increase risk involved with seiche, tsunami, or mudflow. Therefore, no impacts  
1871 related to this issue would occur.  
1872  
1873 e) Conflict with or obstruct implementation of a water quality control plan or sustainable  
1874 groundwater management plan?  
1875 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize  
1876 new development, and is not expected to induce growth or development because, due to caps  
1877 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings  
1878 that may be used, Vacation Rentals are only permitted on a very limited basis. Therefore, no  
1879 impacts related to the implementation of a water quality control plan or sustainable groundwater  
1880 management plan would occur.  
1881  
1882  
1883  
1884

2292 inundation?  
2293 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize  
2294 new development, and is not expected to induce growth or development because, due to caps  
2295 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings  
2296 that may be used, Vacation Rentals are only permitted on a very limited basis. There is no  
2297 potential to increase risk involved with seiche, tsunami, or mudflow. Therefore, no impacts  
2298 related to this issue would occur.  
2299  
2300 e) Conflict with or obstruct implementation of a water quality control plan or sustainable  
2301 groundwater management plan?  
2302 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize  
2303 new development, and is not expected to induce growth or development because, due to caps  
2304 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings  
2305 that may be used, Vacation Rentals are only permitted on a very limited basis. Therefore, no  
2306 impacts related to the implementation of a water quality control plan or sustainable groundwater  
2307 management plan would occur.  
2308  
2309  
2310  
2311

1885  
1886  
1887 Vacation Rentals Ordinance PAGE 42  
City of Los Angeles  
1888 Initial Study December 2019  
1889  
1890  
1891 XI . LAND USE AND PLANNING  
1892  
1893  
1894  
1895  
1896  
1897 Potentially  
1898 Significant  
1899 Impact  
1900 Less Than  
1901 Significant  
1902 with  
1903 Mitigation  
1904 Incorporated  
1905 Less Than  
1906 Significant  
1907 Impact  
1908 No Impact  
1909 Would the project:  
1910  
1911 a. Physically divide an established  
community?  
1912  
1913 b. Cause a significant environmental  
l impact due to a  
1914 conflict with any land use plan, po  
lity, or regulation  
1915 adopted for the purpose of avo  
iding or mitigating  
1916 an environmental effect?  
1917  
1918 a) Physically divide an establishe  
d community?  
1919 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize  
1920 new development and is not expecte

2312  
2313  
2314 Vacation Rentals Ordinance PAGE 48  
City of Los Angeles  
2315 Initial Study June 2020  
2316  
2317  
2318 XI. LAND USE AND PLANNING  
2319  
2320  
2321  
2322  
2323  
2324 Potentially  
2325 Significant  
2326 Impact  
2327 Less Than  
2328 Significant  
2329 with  
2330 Mitigation  
2331 Incorporated  
2332 Less Than  
2333 Significant  
2334 Impact No Impact  
2335 Would the project:  
2336 a. Physically divide an established  
community?  
2337 b. Cause a significant environmental  
l impact due to a  
2338 conflict with any land use  
plan, policy, or  
2339 regulation adopted for the purpo  
se of avoiding or  
2340 mitigating an environmental effect?  
2341  
2342 a) Physically divide an establishe  
d community?  
2343 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize  
2344 new development and is not expecte

1920 new development, and is not expected to induce growth or development because, due to caps  
1921 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings  
1922 that may be used, Vacation Rentals are only permitted on a very limited basis. There will be no  
1923 physical division of an established community, therefore no related impacts would occur.

1924

1925 b) Cause a significant environmental impact due to a conflict with any land use plan, policy,

1926 or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

1927 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1928 new development, and is not expected to induce growth or development because, due to caps

1929 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

1930 that may be used, Vacation Rentals are only permitted on a very limited basis. There would be

1931 no conflict with any applicable land use plan, policy, or regulation. Therefore, no related impacts

1932 would occur.

1933

1934

1935

1936

1937

1938 Vacation Rentals Ordinance PAGE 43

City of Los Angeles

1939 Initial Study December 2019

1940

2344 new development, and is not expected to induce growth or development because, due to caps

2345 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

2346 that may be used, Vacation Rentals are only permitted on a very limited basis. There will be no

2347 physical division of an established community, therefore no related impacts would occur.

2348

2349 b) Cause a significant environmental impact due to a conflict with any land use plan,

2350 policy, or regulation adopted for the purpose of avoiding or mitigating an environmental

2351 effect?

2352 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

2353 new development, and is not expected to induce growth or development because, due to caps

2354 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

2355 that may be used, Vacation Rentals are only permitted on a very limited basis. There would be

2356 no conflict with any applicable land use plan, policy, or regulation. Therefore, no related impacts

2357 would occur.

2358

2359

2360

2361

2362

2363 Vacation Rentals Ordinance PAGE 49

City of Los Angeles

2364 Initial Study June 2020

2365

1940		2365	
1941		2366	
1942	XII. MINERAL RESOURCES	2367	XII. MINERAL RESOURCES
1943		2368	
1944		2369	
1945		2370	
1946		2371	
1947		2372	
1948	Potentially	2373	Potentially
1949	Significant	2374	Significant
1950	Impact	2375	Impact
1951	Less Than	2376	Less Than
1952	Significant	2377	Significant
1953	with	2378	with
1954	Mitigation	2379	Mitigation
1955	Incorporated	2380	Incorporated
1956	Less Than	2381	Less Than
1957	Significant	2382	Significant
1958	Impact	2383	Impact No Impact
1959	No Impact	2384	Would the project:
1960	Would the project:	2385	a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?
		2386	
		2387	
1961		2388	
1962	a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	2389	b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?
1963		2390	
1964		2391	
1965		2392	
1966	b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?		
1967			
1968			
1969			
1970		2393	
1971		2394	
1972	a) Result in the loss of availability of a known mineral resource the	2395	a) Result in the loss of availability of a known mineral resource the

ity of a known mineral resource that would be of value to the region and the residents of the state?

1973 the region and the residents of the state?

1974 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1975 new development, and is not expected to induce growth or development because, due to caps

1976 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

1977 that may be used, Vacation Rentals are only permitted on a very limited basis. The Project

1978 would not result in the loss of availability of a known mineral resource that would be of value to

1979 the region and the residents of the State, therefore, no impacts related to this issue would occur.

1980

1981 b) Result in the loss of availability of a locally-important mineral resource recovery site

1982 delineated on a local general plan, specific plan or other land use plan?

1983 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

1984 new development, and is not expected to induce growth or development because, due to caps

1985 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

1986 that may be used, Vacation Rentals are only permitted on a very limited basis. The Project

1987 would not result in the loss of availability of a locally-important mineral resource recovery site

1988 delineated on a local general plan

ity of a known mineral resource that would be of value to the region and the residents of the state?

2396 the region and the residents of the state?

2397 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

2398 new development, and is not expected to induce growth or development because, due to caps

2399 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

2400 that may be used, Vacation Rentals are only permitted on a very limited basis. The Project

2401 would not result in the loss of availability of a known mineral resource that would be of value to

2402 the region and the residents of the State, therefore, no impacts related to this issue would occur.

2403

2404 b) Result in the loss of availability of a locally-important mineral resource recovery site

2405 delineated on a local general plan, specific plan or other land use plan?

2406 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

2407 new development, and is not expected to induce growth or development because, due to caps

2408 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

2409 that may be used, Vacation Rentals are only permitted on a very limited basis. The Project

2410 would not result in the loss of availability of a locally-important mineral resource recovery site

2411 delineated on a local general plan

1900 delineated on a local general plan,  
specific plan, or other land use pl  
an. Therefore, no impacts  
1989 related to this issue would occur.  
1990  
1991  
1992  
1993  
1994  
1995 Vacation Rentals Ordinance PAGE 44  
City of Los Angeles  
1996 Initial Study December 2019  
1997  
1998  
1999 XIII. NOISE  
2000  
2001  
2002  
2003  
2004  
2005 Potentially  
2006 Significant  
2007 Impact  
2008 Less Than  
2009 Significant  
2010 with  
2011 Mitigation  
2012 Incorporated  
2013 Less Than  
2014 Significant  
2015 Impact  
2016 No Impact  
2017 Would the project result in:  
2018  
2019 a. Generation of a substan  
tial temporary or  
2020 permanent increase in ambient noise  
levels in the  
2021 vicinity of the project in  
excess of standards  
2022 established in the local genera  
l plan or noise  
2023 ordinance, or applicable stan  
dards of other  
2024 agencies?

2411 delineated on a local general plan,  
specific plan, or other land use pl  
an. Therefore, no impacts  
2412 related to this issue would occur.  
2413  
2414  
2415  
2416  
2417  
2418 Vacation Rentals Ordinance PAGE 50  
City of Los Angeles  
2419 Initial Study June 2020  
2420  
2421  
2422 XIII. NOISE  
2423  
2424  
2425  
2426  
2427  
2428 Potentially  
2429 Significant  
2430 Impact  
2431 Less Than  
2432 Significant  
2433 with  
2434 Mitigation  
2435 Incorporated  
2436 Less Than  
2437 Significant  
2438 Impact No Impact  
2439 Would the project result in:  
2440 a. Generation of a substantia  
l temporary or  
2441 permanent increase in ambient noise  
levels in the  
2442 vicinity of the project in exc  
ess of standards  
2443 established in the local genera  
l plan or noise  
2444 ordinance, or applicable stan  
dards of other  
2445 agencies?

2024 agencies:

2025

2026 b. Generation of excessive groundbo  
rne vibration or  
2027 groundborne noise levels?

2028

2029 c. For a project located within the  
vicinity of a private  
2030 airstrip or an airport land use pla  
n or, where such

2031 a plan has not been adopted, within  
two miles of a  
2032 public airport or public use a  
irport, would the  
2033 project expose people residing  
or working in the

2034 project area to excessive noise lev  
els?

2035

2036

2037 a) Generation of a substantial temp  
orary or permanent increase in ambi  
ent noise levels in  
2038 the vicinity of the project in exce  
ss of standards established in the  
local general plan or  
2039 noise ordinance, or applicable stan  
dards of other agencies?

2040 Less than Significant Impact. Based  
upon the analysis set forth above,  
the Project does not

2041 expressly authorize new development  
, and is not expected to induce gro  
wth or development

2042 because, due to caps on the number  
that may operate, eligibility restr  
ictions, and prohibitions on  
2043 the types of buildings that may be  
used, Vacation Rentals are only per  
mitted on a very limited

2044 basis. As such, there would not be  
any noise generated from  
construction-related activities.

2045 There is the possibility of an incr  
ease in operational noise levels in

2445 agencies:

2446

2447 b. Generation of excessive groundbo  
rne vibration or  
2448 groundborne noise levels?

2449

2450 c. For a project located within the  
vicinity of a private  
2451 airstrip or an airport land use pla  
n or, where such

2452 a plan has not been adopted,  
within two miles of

2453 a public airport or public use  
airport, would the

2454 project expose people residing  
or working in the

2455 project area to excessive noise lev  
els?

2456

2457

2458 a) Generation of a substantial  
temporary or permanent increase  
in ambient noise levels  
2459 in the vicinity of the project in e  
xcess of standards established in t  
he local general plan  
2460 or noise ordinance, or applicable s  
tandards of other agencies?

2461 Less than Significant Impact. Based  
upon the analysis set forth above,  
the Project does not

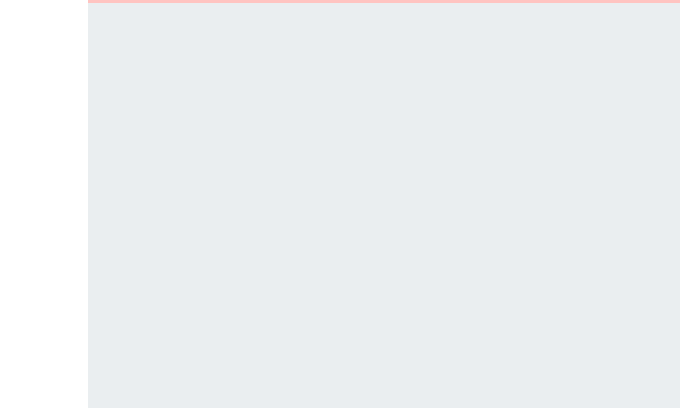
2462 expressly authorize new developm  
ent, and is not expected to  
induce growth or development

2463 because, due to caps on the number  
that may operate, eligibility restr  
ictions, and prohibitions on  
2464 the types of buildings that may be  
used, Vacation Rentals are only per  
mitted on a very limited

2465 basis. As such, there would  
not be any noise generated  
from construction-related  
activities.

2466 While occupancy levels of Vacat  
ion Rentals are presumed to be

case in operational noise levels in homes that are rented under this ordinance. However, there are no studies or other data that show home-sharing results in a substantial increase in noise levels in neighborhoods with short-term vacation rentals so as to violate a local noise ordinance. Additionally, the Project prohibits the use of sound amplifying equipment and outdoor congregations of more than eight people after 10:00 PM. Furthermore, it is anticipated that enforcement of existing Municipal Code noise regulations, for which funding is provided by the proposed ordinance, will generally ensure excess noise does not result from Vacation Rentals. Thus, the impact of the Project on temporary or permanent ambient noise levels is less than significant.



2054  
2055  
2056  
2057  
2058  
2059  
2060

ion rentals are presumed to be similar to existing residential uses, there is the possibility of isolated instances of increases in operational noise levels in homes that are rented as Vacation Rentals simply due to the transient nature of short-term rental guests. However, the Project prohibits the use of sound amplifying equipment and outdoor congregations of more than eight people after 10:00 PM. Furthermore, it is anticipated that enforcement of existing Municipal Code noise regulations, for which funding is provided by the proposed ordinance, will generally ensure excess noise does not result from Vacation Rentals. Additionally, the Project states that Vacation Rental Permittees are responsible for all nuisance violations that occur in the Vacation Rental, and the Permittee is charged a minimum inspection fee for anytime an inspection needs to occur at the unit. Thus, while the vast majority of Vacation Rentals are not expected to have elevated noise levels, regulations and penalties have been included in the Project in order to address Vacation Rentals that do violate noise

2478  
2479  
2480  
2481  
2482  
2483  
2484

2060  
2061

2062  
2063 b) Generation of, excessive groundborne vibration or groundborne noise levels?

2064 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize  
2065 new development, and is not expected to induce growth or development because, due to caps  
2066 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

2067 that may be used, Vacation Rentals are only permitted on a very limited basis. There is no

2068 potential for this Project to facilitate the exposure to groundborne vibration or noise. Therefore,  
2069 no impacts related to this issue would occur.

2070 c) For a project located within the vicinity of a private airstrip or an airport land use plan,  
2071 or, where such a plan has not been adopted, within two miles of a public airport or public

2072 use airport, would the project expose people residing or working in the project area to

2073 excessive noise levels?

2074 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

2075 new development, and is not expected to induce growth or development because, due to caps

2076 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

2484  
2485

2486 standards. Thus, the impact of the Project on temporary or permanent ambient noise levels is  
2487 less than significant.

2488

2489 b) Generation of, excessive groundborne vibration or groundborne noise levels?

2490 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize  
2491 new development, and is not expected to induce growth or development because, due to caps  
2492 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

2493 that may be used, Vacation Rentals are only permitted on a very limited basis. There is no

2494 potential for this Project to facilitate the exposure to groundborne vibration or noise. Therefore,  
2495 no impacts related to this issue would occur.

2496 c) For a project located within the vicinity of a private airstrip or an airport land use plan,  
2497 or, where such a plan has not been adopted, within two miles of a public airport or public

2498 use airport, would the project expose people residing or working in the project area to

2499 excessive noise levels?

2500 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

2501 new development, and is not expected to induce growth or development because, due to caps

2502 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

gibility restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a very limited basis. If a site were located within the vicinity of a major airport, the project site would be subject to the guidance provided in the airport land use plan. Therefore, the Project would not expose people residing or working in the project area to excessive noise levels and no impact would occur.

2081

#### 2082 XIV. POPULATION AND HOUSING

2083

2084

2085

2086

2087

2088 Potentially

2089 Significant

2090 Impact

2091 Less Than

2092 Significant

2093 with

2094 Mitigation

2095 Incorporated

2096 Less Than

2097 Significant

2098 Impact No Impact

2099 Would the project:

2100

2101 a. Induce substantial unplanned population growth in

2102 an area, either directly (for example, by proposing

2103 new homes and businesses) or indirectly (for

2104 example, through extension of roads or other

2105 infrastructure)?

gibility restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a very limited basis. If a site were

2503 that may be used, Vacation Rentals are only permitted on a very limited basis. If a site were located within the vicinity of a major airport, the project site would be subject to the guidance

2504 provided in the airport land use plan. Therefore, the Project would not expose people residing or

2505 working in the project area to excessive noise levels and no impact would occur.

2507

#### 2508 XIV. POPULATION AND HOUSING

2509

2510

2511

2512

2513

2514 Potentially

2515 Significant

2516 Impact

2517 Less Than

2518 Significant

2519 with

2520 Mitigation

2521 Incorporated

2522 Less Than

2523 Significant

2524 Impact No Impact

2525 Would the project:

2526 a. Induce substantial unplanned population growth in

2527 an area, either directly (for example, by proposing

2528 new homes and businesses) or indirectly (for

2529 example, through extension of roads or other

2530 infrastructure)?

2105 Infrastructure):  
2106  
2107 b. Displace substantial numbers of  
existing people or  
2108 housing, necessitating the  
construction of  
2109 replacement housing elsewhere?  
2110  
2111  
2112  
2113  
2114  
2115 Vacation Rentals Ordinance PAGE 46  
City of Los Angeles  
2116 Initial Study December 2019  
2117  
2118  
2119  
2120 a) Induce substantial unplanned po  
pulation growth in an area, either  
2121 directly (for example,  
by proposing new homes and  
businesses) or indirectly (for  
example, through extension of  
2122 roads or other infrastructure)?  
2123 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize  
2124 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps on  
2125 the number that may operate, eligib  
ility restrictions, and prohibition  
s on the types of buildings that  
2126 may be used, Vacation Rentals are o  
nly permitted on a very limited bas  
is. There is no potential  
2127 for inducing population growth, the  
refore no related impacts would occ  
ur.  
2128  
2129 b) Displace substantial number  
s of existing people or housing,  
necessitating the  
2130 construction of replacement housing

2530 Infrastructure):  
2531  
2532 b. Displace substantial numbers  
of existing people  
2533 or housing, necessitating the  
construction of  
2534 replacement housing elsewhere?  
2535  
2536  
2537  
2538  
2539  
2540 Vacation Rentals Ordinance PAGE 52  
City of Los Angeles  
2541 Initial Study June 2020  
2542  
2543  
2544  
2545 a) Induce substantial unplanned  
population growth in an area, either  
2546 directly (for  
example, by proposing new homes  
and businesses) or indirectly  
2547 (for example, through  
extension of roads or other infrast  
ructure)?  
2548 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize  
2549 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps  
2550 on the number that may operate, eli  
gibility restrictions, and prohibit  
ions on the types of buildings  
2551 that may be used, Vacation Ren  
tals are only permitted on a  
very limited basis. There is n  
o  
2552 potential for inducing population g  
rowth, therefore no related impacts  
would occur.  
2553  
2554 b) Displace substantial number  
s of existing people or housing,  
necessitating the  
2555 construction of replacement housing

2130 construction of replacement housing  
elsewhere?  
2131 Less than Significant Impact. Based  
upon the analysis set forth above,  
the Project does not  
2132 expressly authorize new development  
, and is not expected to induce gro  
wth or development  
2133 because, due to caps on the number  
that may operate, eligibility restr  
ictions, and prohibitions on  
2134 the types of buildings that may be  
used, Vacation Rentals are only per  
mitted on a very limited  
2135 basis. Furthermore, the Project req  
uires the dwellings used for Vacati  
on Rentals to be occupied  
  
2136 by the owner on an occasional or in  
termittent basis, meaning this hous  
ing would not be  
2137 available to be otherwise lived in  
by other people. The Project does n  
ot displace any residents,  
2138 and it prohibits buildings that hav  
e been taken out of the rental mark  
et via the Ellis Act from  
  
2139 being used for Vacation Rentals wit  
hin seven years of the building's c  
onversion, so there is no  
2140 incentive for building owners to di  
splace residents to participate in  
Vacation Rentals. Additional  
2141 protective measures, including rest  
ricting Vacation Rental permits to  
only owners of dwelling  
2142 units, limiting the number of Vacat  
ion Rental permits an individual or  
entity can receive to one,  
  
2143 citywide, census tract, and individ  
ual building level caps on the numb  
er of Vacation Rental  
2144 permits that can exist at any one t  
ime, and distancing requirements fr  
om other Vacation Rentals  
2145 all work to ensure that

2555 construction of replacement housing  
elsewhere?  
2556 Less than Significant Impact. Based  
upon the analysis set forth above,  
the Project does not  
2557 expressly authorize new developm  
ent, and is not expected to  
induce growth or development  
2558 because, due to caps on the number  
that may operate, eligibility restr  
ictions, and prohibitions on  
2559 the types of buildings that may be  
used, Vacation Rentals are only per  
mitted on a very limited  
2560 basis. Furthermore, the Project req  
uires the dwellings used for Vacati  
on Rentals to be occupied  
  
2561 by the owner on an occasional  
or intermittent basis, meaning  
this housing would not be  
2562 available to be otherwise lived in  
by other people. The Project does n  
ot displace any residents,  
2563 and it prohibits buildings that  
have been taken out of the re  
ntal market via the Ellis Act  
from  
  
2564 being used for Vacation Rentals wit  
hin seven years of the building's c  
onversion, so there is no  
2565 incentive for building owners to di  
splace residents to participate in  
Vacation Rentals. Additional  
2566 protective measures, including r  
estricting Vacation Rental permi  
ts to only owners of dwelling  
2567 units, limiting the number of Vacat  
ion Rental permits an individual or  
entity can receive to one,  
  
2568 citywide, community plan area, a  
nd individual building level  
caps on the number of Vacation  
2569 Rental permits that can exist at an  
y one time, and distancing requirem  
ents from other Vacation  
2570 Rentals all work to ensure

2145 all work to ensure that  
displacement of existing people is  
less than significant.

2146  
2147  
2148  
2149

2150  
2151  
2152 Vacation Rentals Ordinance PAGE 47  
City of Los Angeles  
2153 Initial Study December 2019  
2154  
2155

2156 XV. PUBLIC SERVICES  
2157  
2158 Would the project result in substan  
tial adverse physical impacts assoc  
iated with the provision of  
2159 new or physically altered governmen  
tal facilities, need for new or phy  
sically altered governmental  
2160 facilities, the construction of  
which could cause significant e  
nvironmental impacts, in order  
to  
2161 maintain acceptable service ratios,  
response times or other performance  
objectives for any of the  
2162 public services:  
2163  
2164

2570 Rentals all work to ensure  
that displacement of existing  
people is less than significant  
. While  
2571 there is potential for isolated  
instances of displacement to oc  
cur as a result of allowing s  
ome  
2572 Vacation Rentals to operate in  
the City, such instances would  
be limited, and there is no  
2573 evidence to suggest that signif  
icant numbers of people would  
be displaced, thus requiring  
2574 construction of new housing elsewhe  
re.

2575  
2576  
2577  
2578

2579  
2580  
2581 Vacation Rentals Ordinance PAGE 53  
City of Los Angeles  
2582 Initial Study June 2020  
2583  
2584

2585 XV. PUBLIC SERVICES  
2586  
2587 Would the project result in substan  
tial adverse physical impacts assoc  
iated with the provision of  
2588 new or physically altered g  
overnmental facilities, need  
for new or physically  
altered  
2589 governmental facilities, the constr  
uction of which could cause signifi  
cant environmental impacts,  
2590 in order to maintain acceptable ser  
vice ratios, response times or othe  
r performance objectives  
2591 for any of the public services:  
2592  
2593

2165  
2166  
2167  
2168 Potentially  
2169 Significant  
2170 Impact  
2171 Less Than  
2172 Significant  
2173 with  
2174 Mitigation  
2175 Incorporated  
2176 Less Than  
2177 Significant

2178 Impact No Impact  
2179 a. Fire protection?  
2180  
2181 b. Police protection?  
2182  
2183 c. Schools?  
2184  
2185 d. Parks?  
2186  
2187 e. Other public facilities?  
2188

2191  
2192  
2193 Vacation Rentals Ordinance PAGE 48  
City of Los Angeles  
2194 Initial Study December 2019  
2195  
2196  
2197

2198 a) Fire protection?  
2199 No Impact. Based upon the analysis  
set forth above, the Project does not expressly authorize

2200 new development, and is not expected to induce growth or development because, due to caps on  
2201 the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that  
2202 may be used. Vacation Rentals are a

2594  
2595  
2596  
2597 Potentially  
2598 Significant  
2599 Impact  
2600 Less Than  
2601 Significant  
2602 with  
2603 Mitigation  
2604 Incorporated  
2605 Less Than  
2606 Significant

2607 Impact No Impact  
2608 a. Fire protection?  
2609 b. Police protection?  
2610 c. Schools?  
2611 d. Parks?  
2612 e. Other public facilities?

2613  
2614  
2615  
2616  
2617 Vacation Rentals Ordinance PAGE 54  
City of Los Angeles  
2618 Initial Study June 2020  
2619  
2620

2621 a) Fire protection?  
2622 No Impact. Based upon the analysis  
set forth above, the Project does not expressly authorize

2623 new development, and is not expected to induce growth or development because, due to caps on  
2624 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings  
2625 that may be used. Vacation Rentals are a

2202 may be used, vacation rentals are only permitted on a very limited basis. Furthermore, there is  
2203 no evidence that Vacation Rentals would increase demands on fire protection services so as to  
2204 require the construction of new or expanded facilities. Therefore, no related impacts would occur.

2205 b) Police protection?  
2206 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize  
2207 new development, and is not expected to induce growth or development because, due to caps on  
2208 the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that  
2209 may be used, Vacation Rentals are only permitted on a very limited basis. Furthermore, there is  
2210 no evidence that Vacation Rentals would increase demands on police protection services so as  
2211 to require the construction of new or expanded facilities. Therefore, no related impacts would  
2212 occur.

2213 c) Schools?  
2214 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize  
2215 new development, and is not expected to induce growth or development because, due to caps on  
2216 the number that may operate, eligib

2625 that may be used, vacation rentals are only permitted on a very limited basis. The Project also  
2626 requires all Vacation Rentals to be equipped with working smoke detectors and fire  
2627 extinguishers, and requires the posting of signs prohibiting outdoor smoking in Very High Fire  
2628 Severity Zones. Furthermore, there is no evidence that Vacation Rentals would increase  
2629 demands on fire protection services so as to require the construction of new or expanded  
2630 facilities. Therefore, no related impacts would occur.

2631 b) Police protection?  
2632 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize  
2633 new development, and is not expected to induce growth or development because, due to caps  
2634 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings  
2635 that may be used, Vacation Rentals are only permitted on a very limited basis. Furthermore,  
2636 there is no evidence that Vacation Rentals would increase demands on police protection  
2637 services so as to require the construction of new or expanded facilities. Therefore, no related  
2638 impacts would occur.

2639 c) Schools?  
2640 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize  
2641 new development, and is not expected to induce growth or development because, due to caps  
2642 on the number that may operate, eli

2210 on the number that may operate, eligi-  
2211 bility restrictions, and prohibition  
2212 s on the types of buildings that  
2213 may be used, Vacation Rentals are o-  
2214 nly permitted on a very limited bas-  
2215 is. Furthermore, there is  
2216 no evidence that Vacation Renta-  
2217 ls would increase demands on s-  
2218 chools so as to require the  
2219 construction of new or expanded sch-  
2220 ool facilities. Therefore, no relat-  
2221 ed impacts would occur.

2220 d) Parks?

2221 No Impact. Based upon the analysis  
2222 set forth above, the Project does n-  
2223 ot expressly authorize

2224 new development, and is not expecte-  
2225 d to induce growth or development b-  
2226 ecause, due to caps on  
2227 the number that may operate, eligib-  
2228 ility restrictions, and prohibition  
2229 s on the types of buildings that  
2230 may be used, Vacation Rentals are o-  
2231 nly permitted on a very limited  
2232 basis. Furthermore, there is  
2233 no evidence that Vacation Renta-  
2234 ls would increase demands on p-  
2235 arks so as to require the  
2236 construction of new or expanded par-  
2237 k facilities. Therefore, no related  
2238 impacts would occur.

2227 e) Other public facilities?

2228 Libraries

2229 No Impact. Based upon the analysis  
2230 set forth above, the Project does n-  
2231 ot expressly authorize

2230 new development, and is not expecte-  
2231 d to induce growth or development b-  
2232 ecause, due to caps on

2231 the number that may operate, eligib-  
2232 ility restrictions, and prohibit

2642 on the number that may operate, eli-  
2643 gibility restrictions, and prohibit  
2644 ions on the types of buildings  
2645 that may be used, Vacation Ren-  
2646 tals are only permitted on a  
2647 very limited basis. Furthermore,  
2648 there is no evidence that Vacation  
2649 Rentals would increase demands on s-  
2650 chools so as to require  
2651 the construction of new or  
2652 expanded school facilities, as us-  
2653 ers of Vacation Residents are

2646 overwhelmingly guests to the City,  
2647 and do not use schools. Therefore,  
2648 no related impacts would  
2649 occur.

2648 d) Parks?

2649 No Impact. Based upon the analysis  
2650 set forth above, the Project does n-  
2651 ot expressly authorize

2650 new development, and is not expecte-  
2651 d to induce growth or development b-  
2652 ecause, due to caps  
2653 on the number that may operate, eli-  
2654 gibility restrictions, and prohibit  
2655 ions on the types of buildings  
2656 that may be used, Vacation Ren-  
2657 tals are only permitted on a  
2658 very limited basis. Furthermore,  
2659 there is no evidence that Vacation  
2660 Rentals would increase demands on p-  
2661 arks so as to require  
2662 the construction of new or expanded  
2663 park facilities. Therefore, no rela-  
2664 ted impacts would occur.

2655 e) Other public facilities?

2656 Libraries

2657 No Impact. Based upon the analysis  
2658 set forth above, the Project does n-  
2659 ot expressly authorize

2658 new development, and is not expecte-  
2659 d to induce growth or development b-  
2660 ecause, due to caps

2659 on the number that may operate, eli-  
2660 gibility restrictions, and prohibit

...ity restrictions, and prohibition  
s on the types of buildings that  
2232 may be used, Vacation Rentals are o  
nly permitted on a very limited  
basis. Furthermore, there is  
2233 no evidence that Vacation  
Rentals would increase demands  
on libraries so as to require  
the  
2234 construction of new or expanded lib  
rary facilities. Therefore, no rela  
ted impacts would occur.

2235  
2236  
2237  
2238

2239  
2240  
2241 Vacation Rentals Ordinance PAGE 49  
City of Los Angeles  
2242 Initial Study December 2019  
2243  
2244

2245 XVI. RECREATION  
2246  
2247  
2248  
2249  
2250  
2251 Potentially  
2252 Significant  
2253 Impact  
2254 Less Than  
2255 Significant  
2256 with  
2257 Mitigation  
2258 Incorporated  
2259 Less Than  
  
Significant  
2260

2261 Impact  
2262 No Impact  
2263  
2264

...ibility restrictions, and prohibi  
tions on the types of buildings  
2660 that may be used, Vacation Ren  
tals are only permitted on a  
very limited basis. Furthermore,  
2661 there is no evidence that Vacation  
Rentals would increase demands on l  
ibraries so as to require  
2662 the construction of new or expanded  
library facilities. Therefore, no r  
elated impacts would occur.

2663  
2664  
2665

2666  
2667  
2668 Vacation Rentals Ordinance PAGE 55  
City of Los Angeles  
2669 Initial Study June 2020  
2670  
2671

2672 XVI. RECREATION  
2673  
2674  
2675  
2676  
2677  
2678 Potentially  
2679 Significant  
2680 Impact  
2681 Less Than  
2682 Significant  
2683 with  
2684 Mitigation  
2685 Incorporated  
2686 Less Than  
  
Significant  
2687

2688 Impact No Impact  
2689  
2690 a. Would the project increase t  
he use of existing  
2691 neighborhood and regional

2265 a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

2271 b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

2277 a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

2280 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize new development, and is not expected to induce growth or development because, due to caps on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a very limited basis. Furthermore, there is no evidence that Vacation Rentals would increase the use of neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

2692 recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

2696 b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

2702 a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

2705 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize new development, and is not expected to induce growth or development because, due to caps on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a very limited basis. Furthermore, there is no evidence that Vacation Rentals would increase the use of neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

2285 od and regional parks or  
other recreational facilities so as  
to cause the substantial physical d  
eterioration of such facilities.  
2286 Therefore, no related impacts would  
occur.

2287  
2288 b) Does the project include  
recreational facilities or require  
the construction or expansion  
2289 of recreational facilities which mi  
ght have an adverse physical effect  
on the environment?

2290 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize  
2291 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps on  
2292 the number that may operate, eligib  
ility restrictions, and prohibition  
s on the types of buildings that  
2293 may be used, Vacation Rentals  
are only permitted on a very  
limited basis. Therefore, the

2294 construction or expansion of recrea  
tional facilities would not be requ  
ired. Therefore, no related  
2295 impacts would occur.

2296  
2297  
2298  
2299

2300  
2301  
2302 Vacation Rentals Ordinance PAGE 50  
City of Los Angeles  
2303 Initial Study December 2019  
2304  
2305  
2306

XVII. TRANSPORTATION/TRAFFIC

2307  
2308

2710 eignbornood and regional  
parks or other recreational facilit  
ies so as to cause the substantial  
physical deterioration of such  
2711 facilities. Therefore, no related i  
mpacts would occur.

2712  
2713 b) Does the project include  
recreational facilities or requi  
re the construction or  
2714 expansion of recreational facili  
ties which might have an  
adverse physical effect on the  
2715 environment?

2716 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize  
2717 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps  
2718 on the number that may operate, eli  
gibility restrictions, and prohibit  
ions on the types of buildings  
2719 that may be used, Vacation Ren  
tals are only permitted on a  
very limited basis. Therefore,  
the

2720 construction or expansion of recrea  
tional facilities would not be requ  
ired. Therefore, no related  
2721 impacts would occur.

2722  
2723  
2724  
2725

2726  
2727  
2728 Vacation Rentals Ordinance PAGE 56  
City of Los Angeles  
2729 Initial Study June 2020  
2730  
2731  
2732

XVII. TRANSPORTATION/TRAFFIC

2733  
2734

2300  
2309  
2310  
2311  
2312 Potentially  
2313 Significant  
2314 Impact  
2315 Less Than  
2316 Significant  
2317 with  
2318 Mitigation  
2319 Incorporated

2320 Less Than  
2321 Significant  
2322 Impact No Impact

2323 Would the project:  
2324  
2325 a. Conflict with a program, plan,  
ordinance or policy  
2326 addressing the circulation sy  
stem, including

2327 transit, roadway, bicycle and pedes  
trian facilities?

2328  
2329 b. Conflict with an  
applicable congestion  
2330 management program, including, but  
not limited to  
2331 level of service standards and  
travel demand

2332 measures, or other standards es  
tablished by the  
2333 county congestion management  
agency for

2334 designated roads or highways?

2335  
2336 c. Substantially increase hazards d  
ue to a geometric  
2337 design feature (e.g., sharp cur  
ves or dangerous

2338 intersections) or incompatible u  
ses (e.g., farm  
2339 equipment)?

2340  
2341 d. Result in inadequate emergency a

2734  
2735  
2736  
2737  
2738 Potentially  
2739 Significant  
2740 Impact  
2741 Less Than  
2742 Significant  
2743 with  
2744 Mitigation  
2745 Incorporated

2746 Less Than  
2747 Significant  
2748 Impact No Impact

2749 Would the project:  
2750 a. Conflict with a program, plan,  
ordinance or policy  
2751 addressing the circulation sy  
stem, including

2752 transit, roadway, bicycle and pedes  
trian facilities?

2753  
2754 b. Conflict with an applicable cong  
estion  
2755 management program, including, b  
ut not limited  
2756 to level of service standards  
and travel demand

2757 measures, or other standards es  
tablished by the  
2758 county congestion management  
agency for

2759 designated roads or highways?

2760  
2761 c. Substantially increase hazards d  
ue to a geometric  
2762 design feature (e.g., sharp cur  
ves or dangerous

2763 intersections) or incompatible u  
ses (e.g., farm  
2764 equipment)?

2765  
2766 d. Result in inadequate emergency a

2341 of result in inadequate emergency a  
ccess?  
2342  
2343  
2344  
2345  
2346  
2347 Vacation Rentals Ordinance PAGE 51  
City of Los Angeles  
2348 Initial Study December 2019  
2349  
2350  
2351  
2352 a) Conflict with a program, plan,  
ordinance or policy addressing the  
circulation system,  
2353 including transit, roadway, bicycle  
and pedestrian facilities?  
2354 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize  
2355 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps on  
2356 the number that may operate, eligib  
ility restrictions, and prohibition  
s on the types of buildings that  
2357 may be used, Vacation Rentals are o  
nly permitted on a very limited bas  
is. For the reasons set  
2358 forth above, it is not  
anticipated the Project will re  
sult in an increase in use of  
residences, an  
2359 increase in traffic or a chang  
e in traffic patterns that wou  
ld cause a conflict with an a  
pplicable  
2360 plan, ordinance, or policy esta  
blishing measures of effectivene  
ss for the performance of the  
2361 circulation system. Therefore, no r  
elated impacts would occur.  
2362  
2363 b) Conflict with an applicable con  
nection management program includi

2769 of result in inadequate emergency a  
ccess?  
2770  
2767  
2768  
2769  
2770  
2771 Vacation Rentals Ordinance PAGE 57  
City of Los Angeles  
2772 Initial Study June 2020  
2773  
2774  
2775  
2776 a) Conflict with a program, plan,  
ordinance or policy addressing the  
circulation system,  
2777 including transit, roadway, bicycle  
and pedestrian facilities?  
2778 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize  
2779 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps  
2780 on the number that may operate, eli  
gibility restrictions, and prohibit  
ions on the types of buildings  
2781 that may be used, Vacation Rentals  
are only permitted on a very limite  
d basis. For the reasons  
2782 set forth above, it is not anticipa  
ted the Project will result in an i  
ncrease in use of residences, an  
2783 increase in traffic or a chang  
e in traffic patterns that wou  
ld cause a conflict with an a  
pplicable  
2784 plan, ordinance, or policy esta  
blishing measures of effectivene  
ss for the performance of the  
2785 circulation system. Therefore, no r  
elated impacts would occur.  
2786  
2787 b) Conflict with an applicabl  
e connection management program

2364 congestion management program, including, but not limited  
2365 to, level of service standards and travel demand measures, or other standards established  
2366 by the county congestion management agency for designated roads or highways?

2366 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

2367 new development, and is not expected to induce growth or development because, due to caps on

2368 the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that  
2369 may be used, Vacation Rentals are only permitted on a very limited basis. For the reasons set

2370 forth above, it is not anticipated the Project will result in an increase in use of residences, an

2371 increase in traffic or a change in traffic patterns that would conflict with applicable congestion

2372 management programs. Therefore, no related impacts would occur.

2373

2374 c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or  
2375 dangerous intersections) or incompatible uses (e.g., farm equipment)?

2376 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

2377 new development, and is not expected to induce growth or development because, due to caps on

2378 the number that may operate, eligibility restrictions, and prohibitions

2788 congestion management program, including, but not  
2789 limited to, level of service standards and travel demand measures, or other standards  
2790 established by the county congestion management agency for designated roads or  
2791 highways?

2791 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

2792 new development, and is not expected to induce growth or development because, due to caps

2793 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that  
2794 may be used, Vacation Rentals are only permitted on a very limited basis. For the reasons

2795 set forth above, it is not anticipated the Project will result in an increase in use of residences, an

2796 increase in traffic or a change in traffic patterns that would conflict with applicable congestion

2797 management programs. Therefore, no related impacts would occur.

2798

2799 c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves  
2800 or dangerous intersections) or incompatible uses (e.g., farm equipment)?

2801 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

2802 new development, and is not expected to induce growth or development because, due to caps

2803 on the number that may operate, eligibility restrictions, and prohibitions

2379 may be used, Vacation Rentals are only permitted on a very limited basis. For the reasons set  
2380 forth above, it is not anticipated the Project will result in an increase in use of residences, an  
2381 increase in traffic or a change in traffic patterns that would result in proposed changes for roadway  
2382 designs or incompatible uses. Therefore, no related impacts would occur.

2383  
2384 d) Result in inadequate emergency access?  
2385 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize  
2386 new development, and is not expected to induce growth or development because, due to caps  
2387 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings  
2388 that may be used, Vacation Rentals are only permitted on a very limited basis. Therefore, no  
2389 related impacts would occur.

2390  
2391  
2392  
2393  
2394  
2395 Vacation Rentals Ordinance PAGE 52  
City of Los Angeles  
2396 Initial Study December 2019  
2397  
2398

2804 that may be used, Vacation Rentals are only permitted on a very limited basis. For the reasons  
2805 set forth above, it is not anticipated the Project will result in an increase in use of residences, an  
2806 increase in traffic or a change in traffic patterns that would result in proposed changes for  
2807 roadway designs or incompatible uses. Therefore, no related impacts would occur.

2808  
2809 d) Result in inadequate emergency access?  
2810 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize  
2811 new development, and is not expected to induce growth or development because, due to caps  
2812 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings  
2813 that may be used, Vacation Rentals are only permitted on a very limited basis. Therefore,  
2814 no related impacts would occur.

2815  
2816  
2817  
2818  
2819  
2820 Vacation Rentals Ordinance PAGE 58  
City of Los Angeles  
2821 Initial Study June 2020  
2822  
2823

2400

2401

2402

2403

2404 Would the project cause a substantial adverse change in the significance of a tribal cultural

2405 resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural

2406 landscape that is geographically defined in terms of the size and scope of the landscape, sacred

2407 place, or object with cultural value to a California Native American tribe, and that is:

2408

2409

2410

2411 Potentially

2412 Significant

2413 Impact

2414 Less Than

2415 Significant

2416 with

2417 Mitigation

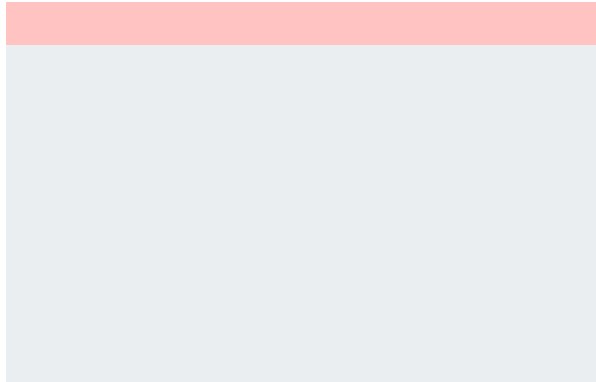
2418 Incorporated

2419 Less Than

2420 Significant

2421 Impact No Impact

2422



2423

2424 a. Listed or eligible for listing in the California

2825

2826

2827

2828

2829 Would the project cause a substantial adverse change in the significance of a tribal cultural

2830 resource, defined in Public Resources Code section 21074 as either a site, feature, place,

2831 cultural landscape that is geographically defined in terms of the size and scope of the

2832 landscape, sacred place, or object with cultural value to a California Native American tribe, and

2833 that is:

2834

2835

2836

2837 Potentially

2838 Significant

2839 Impact

2840 Less Than

2841 Significant

2842 with

2843 Mitigation

2844 Incorporated

2845 Less Than

2846 Significant

2847 Impact No Impact

2848

2849 a. Listed or eligible for listing in the California

2850 Register of Historical Resources, or in a local

2851 register of historical resources as defined in

2852 Public Resources Code section 5020.1(k), or

2853

2854 b. A resource determined by the lead agency, in its

2425 Register of Historical Resources  
, or in a local  
2426 register of historical resources as  
defined in Public  
2427 Resources Code section 5020.1(k), o  
r  
2428  
2429 b. A resource determined by the  
lead agency, in its  
2430 discretion and supported by substan  
tial evidence,  
2431 to be significant pursuant to  
criteria set forth in  
2432 subdivision (c) of Public Resources  
Code Section  
2433 5024.1. In applying the cri  
teria set forth in  
2434 subdivision (c) of Public Resou  
rce Code Section  
2435 5024.1, the lead agency sha  
ll consider the  
2436 significance of the resource to a C  
alifornia Native  
2437 American tribe.  
2438  
2439  
2440 a) Would the project cause a  
substantial adverse change in t  
he significance of a tribal  
2441 cultural resource, defined in Publi  
c Resources Code section 21074 as e  
ither a site, feature,  
2442 place, cultural landscape that is g  
eographically defined in terms of t  
he size and scope of  
2443 the landscape, sacred place, or obj  
ect with cultural value to a Califo  
rnia Native American  
2444 tribe, and that is: Listed or  
eligible for listing in the Ca  
lifornia Register of Historical  
Resources, or in a local regis  
2445 ter of historical resources as  
defined in Public Resources

2855 discretion and supported by substan  
tial evidence,  
2856 to be significant pursuant to  
criteria set forth in  
2857 subdivision (c) of Public Resources  
Code Section  
2858 5024.1. In applying the cri  
teria set forth in  
2859 subdivision (c) of Public Resou  
rce Code Section  
2860 5024.1, the lead agency shall  
consider the  
2861 significance of the resource to a C  
alifornia Native  
2862 American tribe.  
2863  
2864  
2865 a) Would the project cause a  
substantial adverse change in t  
he significance of a tribal  
2866 cultural resource, defined in P  
ublic Resources Code section 21  
074 as either a site,  
2867 feature, place, cultural landscape  
that is geographically defined in t  
erms of the size and  
2868 scope of the landscape, sacred plac  
e, or object with cultural value to  
a California Native  
2869 American tribe, and that is: L  
isted or eligible for listing  
in the California Register of  
Historical Resources, or in a l  
2870 ocal register of historical res  
ources as defined in Public

2440 Code section 5020.1 (K)?

2447 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

2448 new development, and is not expected to induce growth or development because, due to caps

2449 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

2450 that may be used, Vacation Rentals are only permitted on a very limited basis. Most tribal

2451 cultural resources are anticipated with buried resources and land valued for association with

2452 tribal practices. The Project will not result in any excavation of soils or ground disturbance, and

2453 therefore, no related impacts would occur.

2454

2455

2456

2457

2458 Vacation Rentals Ordinance PAGE 53 City of Los Angeles

2459 Initial Study December 2019

2460

2461

2462 b) Would the project cause a substantial adverse change in the significance of a tribal

2463 cultural resource, defined in Public Resources Code section 21074 as either a site, feature,

2464 place, cultural landscape that is geographically defined in terms of the size and scope of

2465 the landscape, sacred place, or object with cultural value to a California Native American

2466 tribe, and that is: A resource determined by the lead agency,

2871 Resources Code section 5020.1 (K)?

2872 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

2873 new development, and is not expected to induce growth or development because, due to caps

2874 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

2875 that may be used, Vacation Rentals are only permitted on a very limited basis. Most tribal

2876 cultural resources are anticipated with buried resources and land valued for association with

2877 tribal practices. The Project will not result in any excavation of soils or ground disturbance, and

2878 therefore, no related impacts would occur.

2879

2880

2881

2882

2883 Vacation Rentals Ordinance PAGE 59 City of Los Angeles

2884 Initial Study June 2020

2885

2886

2887 b) Would the project cause a substantial adverse change in the significance of a tribal

2888 cultural resource, defined in Public Resources Code section 21074 as either a site,

2889 feature, place, cultural landscape that is geographically defined in terms of the size and

2890 scope of the landscape, sacred place, or object with cultural value to a California Native

2891 American tribe, and that is: A resource determined by the lead

in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

2471 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize new development, and is not expected to induce growth or development because, due to caps on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a very limited basis. Most tribal cultural resources are anticipated with buried resources and land valued for association with tribal practices. The Project will not result in any excavation of soils or ground disturbance, and therefore, no related impacts would occur.

2478 Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code 21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice inviting consultation

agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

2896 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize new development, and is not expected to induce growth or development because, due to caps on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a very limited basis. Most tribal cultural resources are anticipated with buried resources and land valued for association with tribal practices. The Project will not result in any excavation of soils or ground disturbance, and therefore, no related impacts would occur.

2903 Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code 21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice inviting consultation

2481 provide notice inviting consultation to California Native American tribes that are traditionally and  
2482 culturally affiliated with the geographic area of a proposed ordinance if the Tribe has submitted  
2483 a request in writing to be notified of Proposed Ordinances. The Tribe must respond in writing  
2484 within 30 days of the City's AB52 notice. The Native American Heritage Commission (NAHC)  
2485 provided a list of Native American groups and individuals who might have knowledge of the  
2486 religious and/or cultural significance of resources that may be in and near the project site. In  
2487 accordance with AB 52, notice of the Project was provided on December 2, 2019 to tribes who  
2488 have requested such notice in the City of Los Angeles, and no tribes requested consultation.

2489  
2490  
2491

2492  
2493  
2494 Vacation Rentals Ordinance PAGE 54  
City of Los Angeles  
2495 Initial Study December 2019

2496  
2497

2498 XIX. UTILITIES AND SERVICE SYSTEMS

2499  
2500  
2501  
2502  
2503

2504 Potentially  
2505 Significant

2900 provide notice inviting consultation to California Native American tribes that are traditionally and  
2907 culturally affiliated with the geographic area of a proposed ordinance if the Tribe has submitted  
2908 a request in writing to be notified of Proposed Ordinances. The Tribe must respond in writing  
2909 within 30 days of the City's AB52 notice. The Native American Heritage Commission (NAHC)  
2910 provided a list of Native American groups and individuals who might have knowledge of the  
2911 religious and/or cultural significance of resources that may be in and near the project site. In  
2912 accordance with AB 52, notice of the Project was provided on December 2, 2019 to tribes who  
2913 have requested such notice in the City of Los Angeles, and no tribes requested consultation.

2914  
2915  
2916

2917  
2918  
2919 Vacation Rentals Ordinance PAGE 60  
City of Los Angeles  
2920 Initial Study June 2020

2921  
2922

2923 XIX. UTILITIES AND SERVICE SYSTEMS

2924  
2925  
2926  
2927  
2928

2929 Potentially  
2930 Significant

2505 Significant

2506 Impact

2507 Less Than

2508 Significant

2509 with

2510 Mitigation

2511 Incorporated

2512 Less Than

2513 Significant

2514 Impact

2515 No Impact

2516 Would the project:

2517

2518 a. Require or result in the relocation or construction

2519 of new or expanded water, waste water treatment

2520 or storm water drainage, electric power, natural

2521 gas, or telecommunications facilities, the

2522 construction or relocation of which could cause

2523 significant environmental effects?

2524

2525 b. Have sufficient water supplies available to serve

2526 the project and reasonably foreseeable future

2527 development during normal, dry and multiple dry

2528 years?

2529

2530 c. Result in a determination by the wastewater

2531 treatment provider which serves or may serve the

2532 project that it has adequate capacity to serve the

2533 project's projected demand in addition to the

2534 provider's existing commitments?

2535

2930 Significant

2931 Impact

2932 Less Than

2933 Significant

2934 with

2935 Mitigation

2936 Incorporated

2937 Less Than

2938 Significant

2939 Impact No Impact

2940 Would the project:

2941 a. Require or result in the relocation or construction

2942 of new or expanded water, wastewater treatment

2943 or storm water drainage, electric power, natural

2944 gas, or telecommunications facilities, the

2945 construction or relocation of which could cause

2946 significant environmental effects?

2947

2948 b. Have sufficient water supplies available to serve

2949 the project and reasonably foreseeable future

2950 development during normal, dry and multiple dry

2951 years?

2952

2953 c. Result in a determination by the wastewater

2954 treatment provider which serves or may serve the

2955 project that it has adequate capacity to serve the

2956 project's projected demand in addition to the

2957 provider's existing commitments?

2958

2536 d. Generate solid waste in excess  
of State or local  
2537 standards, or in excess of the  
capacity of local  
2538 infrastructure, or otherwise impair  
the attainment of  
2539 solid waste reduction goals?

2540  
2541 e. Comply with federal, state, and  
local management  
2542 and reduction statutes and regu-  
lations related to  
2543 solid waste?

2544  
2545  
2546

2547  
2548  
2549 Vacation Rentals Ordinance PAGE 55  
City of Los Angeles  
2550 Initial Study December 2019  
2551  
2552

2553  
2554 a) Require or result in the reloca-  
tion or construction of new or expan-  
ded water, wastewater  
2555 treatment or storm water draina-  
ge, electric power, natural gas  
, or telecommunications  
2556 facilities, the construction or  
relocation of which could cause  
significant environmental  
2557 effects?

2558 No Impact. Based upon the analysis  
set forth above, the Project does not  
expressly authorize  
2559 new development, and is not expected  
to induce growth or development be-  
cause, due to caps on  
2560 the number that may operate, eligi-  
bility restrictions, and prohibitions  
on the types of buildings that  
2561 may be used, Vacation Rentals are only  
permitted on a very limited basis. It  
does not propose nor

2959 d. Generate solid waste in excess  
of State or local  
2960 standards, or in excess of the  
capacity of local  
2961 infrastructure, or otherwise impair  
the attainment  
2962 of solid waste reduction goals?

2963  
2964 e. Comply with federal, state, and  
local management  
2965 and reduction statutes and regu-  
lations related to  
2966 solid waste?

2967  
2968  
2969

2970  
2971  
2972 Vacation Rentals Ordinance PAGE 61  
City of Los Angeles  
2973 Initial Study June 2020  
2974  
2975

2976  
2977 a) Require or result in the  
relocation or construction of new  
or expanded water,  
2978 wastewater treatment or storm  
water drainage, electric power,  
natural gas, or  
2979 telecommunications facilities, the  
construction or relocation of  
which could cause  
2980 significant environmental effects?

2981 No Impact. Based upon the analysis  
set forth above, the Project does not  
expressly authorize  
2982 new development, and is not expected  
to induce growth or development be-  
cause, due to caps  
2983 on the number that may operate, eli-  
gibility restrictions, and prohibitions  
on the types of buildings  
2984 that may be used, Vacation Rentals  
are only permitted on a very limited  
basis. The occupancy

2562 will it require construction of  
new water, wastewater treatment,  
storm water drainage facilities,  
2563 electric power, natural gas, or  
telecommunication facilities or  
expansion of existing facilities  
.   
2564 Therefore, no related impacts would  
occur.

2565  
2566  
2567  
2568  
2569  
2570  
2571  
2572  
2573

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

No Impact. Based upon the analysis set forth above, the Project does not expressly authorize new development, and is not expected to induce growth or development because, due to caps on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a very limited basis. The Project is not intensifying the use of any existing residential structures beyond the baseline conditions, and there is no evidence that Vacation Rental activity results in significant increases in water usage.

of Vacation Rentals is anticipated to be the same as long term residential uses of dwelling units.  
2986 Therefore, use of water, electric, and telecommunication should be similar to usage of dwelling  
2987 units used for long-term housing. The Project does not propose nor will it require construction of  
2988 new water, wastewater treatment, storm water drainage facilities, electric power, natural gas, or  
2989 telecommunication facilities or expansion of existing facilities. Therefore, no related impacts  
2990 would occur.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

No Impact. Based upon the analysis set forth above, the Project does not expressly authorize new development, and is not expected to induce growth or development because, due to caps on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that may be used, Vacation Rentals are only permitted on a very limited basis. The Project is not intensifying the use of any existing residential structures beyond the baseline conditions, and there is no evidence that Vacation Rental activity results in significant increases in water usage.

2574 over current conditions. Therefore,  
no related impacts would occur.

2575

2576 c) Result in a determination by the  
wastewater treatment provider which  
serves or may  
2577 serve the project that it has adequate  
capacity to serve the project's  
projected demand in  
2578 addition to the provider's existing  
commitments?

2579 No Impact. Based upon the analysis  
set forth above, the Project does not  
expressly authorize

2580 new development, and is not expected  
to induce growth or development because,  
due to caps on

2581 the number that may operate, eligibility  
restrictions, and prohibitions on the  
types of buildings that

2582 may be used, Vacation Rentals are only  
permitted on a very limited basis. The  
Project is not

2583 intensifying the use of any existing  
residential structures beyond the baseline  
conditions, and

2584 there is no evidence that Vacation  
Rental activity results in significant  
increases in the generation

2585 of wastewater. Therefore, no related  
impacts would occur.

2586

2587 d) Generate solid waste in excess  
of State or local standards, or in  
excess of the capacity

2588 of local infrastructure, or otherwise  
impair the attainment of solid waste  
reduction goals?

2589 No Impact. Based upon the analysis  
set forth above, the Project does not  
expressly authorize

3000 usage over current conditions. Therefore,  
no related impacts would occur.

3001

3002 c) Result in a determination by the  
wastewater treatment provider which  
serves or may  
3003 serve the project that it has adequate  
capacity to serve the project's  
projected demand in  
3004 addition to the provider's existing  
commitments?

3005 No Impact. Based upon the analysis  
set forth above, the Project does not  
expressly authorize

3006 new development, and is not expected  
to induce growth or development because,  
due to caps on

3007 the number that may operate, eligibility  
restrictions, and prohibitions on the  
types of buildings that

3008 that may be used, Vacation Rentals are  
only permitted on a very limited basis.  
The Project is

3009 not intensifying the use of any  
existing residential structures beyond the  
baseline conditions,

3010 and there is no evidence that  
Vacation Rental activity results in  
significant increases in the

3011 generation of wastewater. Therefore,  
no related impacts would occur.

3012

2590 new development, and is not expected to induce growth or development because, due to caps on  
2591 the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that  
2592 may be used, Vacation Rentals are only permitted on a very limited basis. The Project is not  
2593 intensifying the use of any existing residential structures beyond the baseline conditions, and  
2594 there is no evidence that Vacation Rental activity results in significant increases in the generation  
2595 of solid waste over existing conditions. Therefore, no related impacts would occur.

2596 3013

2597

2598 3014

2599 3015

2600 3016

2601 Vacation Rentals Ordinance PAGE 56

City of Los Angeles

2602 Initial Study December 2019

2603 3017

3018

3019

3020 Vacation Rentals Ordinance PAGE 62

City of Los Angeles

3021 Initial Study June 2020

3022

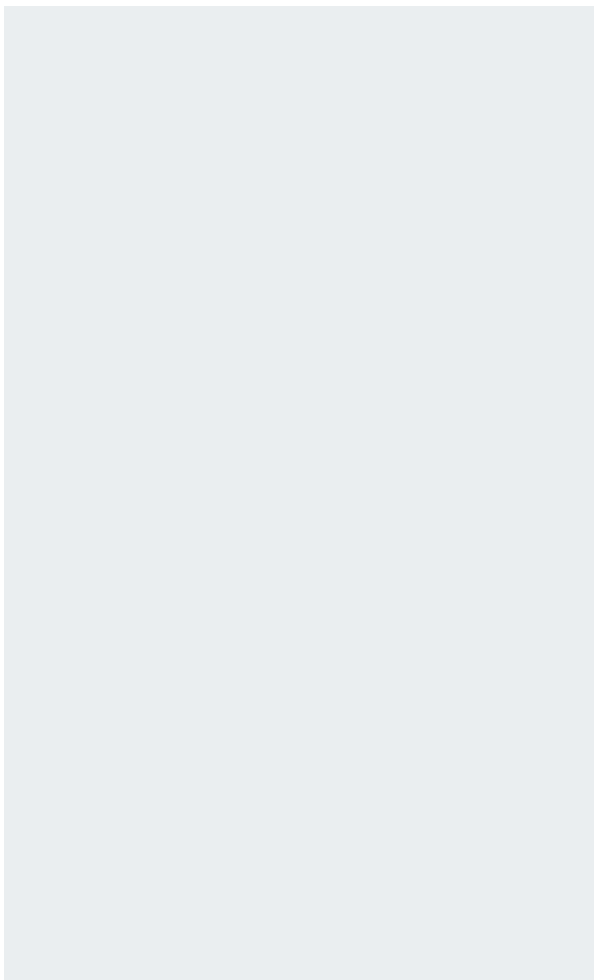
3023

3024 d) Generate solid waste in excess of State or local standards, or in excess of the  
3025 capacity of local infrastructure, or otherwise impair the attainment of solid waste

3026 reduction goals?

3027 No Impact. Based upon the analysis

set forth above, the Project does not



set forth above, the Project does not expressly authorize  
 3028 new development, and is not expected to induce growth or development because, due to caps  
 3029 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings  
 3030 that may be used, Vacation Rentals are only permitted on a very limited basis. The Project is  
 3031 not intensifying the use of any existing residential structures beyond the baseline conditions,  
 3032 and there is no evidence that Vacation Rental activity results in significant increases in the  
 3033 generation of solid waste over existing conditions. Therefore, no related impacts would occur.

2604

3034

2605 e) Comply with federal, state, and local management and reduction statutes and

3035 e) Comply with federal, state, and local management and reduction statutes and

2606 regulations related to solid waste?

3036 regulations related to solid waste?

2607 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

3037 No Impact. Based upon the analysis set forth above, the Project does not expressly authorize

2608 new development, and is not expected to induce growth or development because, due to caps on

3038 new development, and is not expected to induce growth or development because, due to caps

2609 the number that may operate, eligibility restrictions, and prohibitions on the types of buildings that

3039 on the number that may operate, eligibility restrictions, and prohibitions on the types of buildings

2610 may be used, Vacation Rentals are only permitted on a very limited basis. It affects existing

3040 that may be used, Vacation Rentals are only permitted on a very limited basis. It affects existing

2611 residences which complies with all applicable federal, state, and local statutes and regulations

3041 residences which complies with all applicable federal, state, and local statutes and regulations

2612 related to solid waste generation

3042 related to solid waste generation

2612 related to solid waste generation,  
and no significant impacts related  
to this issue would occur.

2613

2614

2615

2616

2617

2618

2619 Vacation Rentals Ordinance PAGE 57  
City of Los Angeles

2620 Initial Study December 2019

2621

2622

2623 XX. WILDFIRE

2624

2625 If located in or near state responsi-  
bility areas or lands classified as  
a very high fire hazard severity

2626 zones:

2627

2628

2629

2630

2631 Potentially

2632 Significant

2633 Impact

2634 Less Than

2635 Significant

2636 with

2637 Mitigation

2638 Incorporated

2639 Less Than

2640 Significant

2641 Impact

2642 No Impact

2643 Would the project:

2644

2645 a. Substantially impair an  
adopted emergency

2646 response plan or emergency evacuati-  
on plan?

2647

2648 b. Due to slope, prevailing winds,  
and other factors

3042 related to solid waste generation,  
and no significant impacts related  
to this issue would occur.

3043

3044

3045

3046

3047

3048

3049 Vacation Rentals Ordinance PAGE 63  
City of Los Angeles

3050 Initial Study June 2020

3051

3052

3053 XX. WILDFIRE

3054

3055 If located in or near state responsi-  
bility areas or lands classified as  
a very high fire hazard severity

3056 zones:

3057

3058

3059

3060

3061 Potentially

3062 Significant

3063 Impact

3064 Less Than

3065 Significant

3066 with

3067 Mitigation

3068 Incorporated

3069 Less Than

3070 Significant

3071 Impact No Impact

3072 Would the project:

3073 a. Substantially impair an  
adopted emergency

3074 response plan or emergency evacuati-  
on plan?

3075

3076 b. Due to slope, prevailing winds,  
and other factors

and other factors,

2649 exacerbate wildfire risks, and  
and thereby expose  
2650 project occupants to, pollutant  
concentrations from  
2651 a wildfire or the uncontrolled  
spread of a wildfire?

2652

2653 c. Require the installation  
or maintenance of  
2654 associated infrastructure (such  
as roads, fuel  
2655 breaks, emergency water sources, po  
wer lines or  
2656 other utilities) that may exacerbat  
e fire risk or that  
2657 may result in temporary or ongoing  
impacts to the  
2658 environment?

2659

2660 d. Expose people or structures  
to significant risks,  
2661 including downslope or downstrea  
m flooding or  
2662 landslides, as a result of run  
off, post-fire slope  
2663 instability, or drainage changes?

2664

2665 a) Substantially impair an ad  
opted emergency response plan o  
r emergency evacuation  
2666 plan?

2667 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize

2668 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps on  
2669 the number that may operate, eligib  
ility restrictions, and prohibition  
s on the types of buildings that

2670 may be used, Vacation Rentals  
are only permitted on a very  
limited basis. The Project is n

and other factors,

3077 exacerbate wildfire risks, an  
d thereby expose  
3078 project occupants to, polluta  
nt concentrations  
3079 from a wildfire or the uncontr  
olled spread of a  
3080 wildfire?

3081

3082 c. Require the installation  
or maintenance of  
3083 associated infrastructure (such  
as roads, fuel  
3084 breaks, emergency water sources, po  
wer lines or  
3085 other utilities) that may exacerbat  
e fire risk or that  
3086 may result in temporary or ongoing  
impacts to the  
3087 environment?

3088

3089 d. Expose people or structures  
to significant risks,  
3090 including downslope or downstrea  
m flooding or  
3091 landslides, as a result of runo  
ff, post-fire slope  
3092 instability, or drainage changes?

3093

3094 a) Substantially impair an ado  
pted emergency response plan or  
emergency evacuation  
3095 plan?

3096 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize

3097 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps  
3098 on the number that may operate, eli  
gibility restrictions, and prohibit  
ions on the types of buildings

3099 that may be used, Vacation Ren  
tals are only permitted on a  
very limited basis. The Project i

limited basis. The Project is not  
2671 intensifying the use of any existin  
g residential structures beyond the  
baseline conditions, and thus  
2672 will not impair any adopted em  
ergency response or evacuation  
plans. Therefore, no impacts  
2673 related to this issue will occur.

2674  
2675 b) Due to slope, prevailing winds,  
and other factors, exacerbate wildf  
ire risks, and thereby  
2676 expose project occupants to, pollut  
ant concentrations from a wildfire  
or the uncontrolled  
2677 spread of a wildfire?

2678 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize  
2679 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps  
2680 on the number that may operate, eli  
gibility restrictions, and prohibit  
ions on the types of buildings  
2681 that may be used, Vacation Rentals  
are only permitted on a very limite  
d basis. Therefore, no  
2682 impacts related to this issue will  
occur.

2683  
2684

2685  
2686  
2687 Vacation Rentals Ordinance PAGE 58  
City of Los Angeles  
2688 Initial Study December 2019  
2689  
2690

2691 c) Require the installation o  
r maintenance of associated inf  
rastructure (such as roads,

very limited basis. The Project i  
s  
3100 not intensifying the use of  
any existing residential structu  
res beyond the baseline conditi  
ons,  
3101 and thus will not impair any  
adopted emergency response or e  
vacuation plans. Therefore, no  
3102 impacts related to this issue will  
occur.

3103  
3104 b) Due to slope, prevailing w  
inds, and other factors, exacer  
bate wildfire risks, and  
3105 thereby expose project occupants  
to, pollutant concentrations fro  
m a wildfire or the  
3106 uncontrolled spread of a wildfire?

3107 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize  
3108 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps  
3109 on the number that may operate, eli  
gibility restrictions, and prohibit  
ions on the types of buildings  
3110 that may be used, Vacation Ren  
tals are only permitted on a ve  
ry limited basis. Additionally, in

3111  
3112

3113  
3114

3115 Vacation Rentals Ordinance PAGE 64  
City of Los Angeles  
3116 Initial Study June 2020  
3117  
3118

3119 order to help prevent wildfires  
, the Project requires signs p  
rohibiting outdoor smoking in a  
11

2692 fuel breaks, emergency water source  
s, power lines or other utilities)  
that may exacerbate  
2693 fire risk or that may result in tem  
porary or ongoing impacts to the en  
vironment?  
2694 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize  
2695 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps on  
2696 the number that may operate, eligib  
ility restrictions, and prohibition  
s on the types of buildings that  
2697 may be used, Vacation Rentals are o  
nly permitted on a very limited bas  
is. The ordinance will not  
2698 result in the need for the installa  
tion or maintenance of infrastru  
cture, and therefore, no impacts  
2699 related to this issue will occur.  
2700  
2701 d) Expose people or structures to  
significant risks, including downsl  
ope or downstream  
2702 flooding or landslides, as a r  
esult of runoff, post-fire slop  
e instability, or drainage  
2703 changes?  
2704 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize  
2705 new development, and is not expecte  
d to induce growth or development b

3120 Vacation Rentals located in Very Hi  
gh Fire Severity Zones. Therefore,  
no impacts related to this  
3121 issue will occur.  
3122 c) Require the installation or  
maintenance of associated infras  
tructure (such as roads,  
3123 fuel breaks, emergency water source  
s, power lines or other utilities)  
that may exacerbate  
3124 fire risk or that may result in tem  
porary or ongoing impacts to the en  
vironment?  
3125 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize  
3126 new development, and is not expecte  
d to induce growth or development b  
ecause, due to caps  
3127 on the number that may operate, eli  
gibility restrictions, and prohibit  
ions on the types of buildings  
3128 that may be used, Vacation  
Rentals are only permitted on  
a very limited basis. The  
3129 ordinance  
will not result in the need for the  
3130 installation or maintenance of infr  
astructure, and therefore, no  
impacts related to this issue will  
occur.  
3131  
3132 d) Expose people or structures to  
significant risks, including downsl  
ope or downstream  
3133 flooding or landslides, as a r  
esult of runoff, post-fire slop  
e instability, or drainage  
3134 changes?  
3135 No Impact. Based upon the analysis  
set forth above, the Project does n  
ot expressly authorize  
3136 new development, and is not expecte  
d to induce growth or development b

u to induce growth or development b  
ecause, due to caps

2706 on the number that may operate, eli  
gibility restrictions, and prohibit  
ions on the types of buildings

2707 that may be used, Vacation Rentals  
are only permitted on a very limite  
d basis. The Project is

2708 not intensifying the use of any exi  
sting residential structures beyond  
the baseline conditions,

2709 and therefore will not increase the  
risk of exposing people or structur  
es to risks of landslides or

2710 flooding. Therefore, no related imp  
acts will occur.

2711

2712

2713

2714

2715

2716 Vacation Rentals Ordinance PAGE 59  
City of Los Angeles

2717 Initial Study December 2019

2718

2719

2720 XXI. MANDATORY FINDINGS OF SIGNIFI  
CANCE

2721

2722

2723

2724

2725

2726 Potentially

2727 Significant

2728 Impact

2729 Less Than

2730 Significant

2731 with

2732 Mitigation

2733 Incorporated

2734 Less Than

u to induce growth or development b  
ecause, due to caps

3137 on the number that may operate, eli  
gibility restrictions, and prohibit  
ions on the types of buildings

3138 that may be used, Vacation Ren  
tals are only permitted on a v  
ery limited basis. The Project i  
s

3139 not intensifying the use of  
any existing residential  
structures beyond the baseline  
conditions,

3140 and therefore will not increase the  
risk of exposing people or structur  
es to risks of landslides or

3141 flooding. Therefore, no related imp  
acts will occur.

3142

3143

3144

3145

3146

3147 Vacation Rentals Ordinance PAGE 65  
City of Los Angeles

3148 Initial Study June 2020

3149

3150

3151 XXI. MANDATORY FINDINGS OF SIGNIFI  
CANCE

3152

3153

3154

3155

3156

3157 Potentially

3158 Significant

3159 Impact

3160 Less Than

3161 Significant

3162 with

3163 Mitigation

3164 Incorporated

3165 Less Than

2735 Significant  
2736 Impact  
2737 No Impact

2738 a. Does the project have the potential to substantially  
2739 degrade the quality of  
2740 the environment,  
2741 substantially reduce the habitat of  
2742 a fish or wildlife  
2743 species, cause a fish or wildlife population to drop  
2744 below self-sustaining levels, threaten to eliminate  
2745 a plant or animal community, substantially reduce  
2746 the number or restrict the range of a rare or  
2747 endangered plant or animal or eliminate important  
2748 examples of the major periods of California history  
2749 or prehistory?

2749 b. Does the project have impacts that are individually  
2750 limited, but cumulatively  
2751 ("Cumulatively considerable" means that the  
2752 incremental effects of a project  
2753 when viewed in connection with the effects of past  
2754 projects, the effects of other current projects, and  
2755 the effects of probable future projects)?

2756  
2757 c. Does the project have environmental effects which  
2758 will cause substantial adverse effects on human  
2759 beings, either directly or indirectly

3166 Significant  
3167 Impact No Impact  
3168 a. Does the project have the potential to  
3169 substantially degrade the quality of the  
3170 environment, substantially reduce the habitat of a  
3171 fish or wildlife species, cause a fish or wildlife  
3172 population to drop below self-sustaining levels,  
3173 threaten to eliminate a plant or animal community,  
3174 substantially reduce the number or restrict the  
3175 range of a rare or endangered plant or animal or  
3176 eliminate important examples of the major periods  
3177 of California history or prehistory?

3178  
3179 b. Does the project have impacts that are  
3180 individually limited, but cumulatively  
3181 considerable? ("Cumulatively considerable"  
3182 means that the incremental effects of a project  
3183 are considerable when viewed in connection with  
3184 the effects of past projects, the effects of other  
3185 current projects, and the effects of probable future  
3186 projects)?

3187  
3188 c. Does the project have environmental effects which  
3189 will cause substantial adverse effects on  
3190 human beings, either directly or indirectly

2759 beings, either directly or indirectly?  
2760  
2761  
2762  
2763  
2764  
2765 Vacation Rentals Ordinance PAGE 60  
City of Los Angeles  
2766 Initial Study December 2019  
2767  
2768  
2769  
2770 a) Does the project have the  
potential to substantially degrad  
e the quality of the  
2771 environment, substantially reduce t  
he habitat of a fish or wildlife sp  
ecies, cause a fish or  
2772 wildlife population to drop bel  
ow self-sustaining levels, threa  
ten to eliminate a plant or  
2773 animal community, substantially r  
educe the number or restrict t  
he range of a rare or  
2774 endangered plant or animal or  
eliminate important examples of  
the major periods of  
2775 California history or prehistory?  
2776 No Impact. For the reasons stated i  
n this Initial Study, the Project w  
ould not have the potential to  
2777 degrade the quality of the environm  
ent, substantially reduce the habit  
at of fish or wildlife species,  
2778 cause a fish or wildlife population  
to drop below self-sustaining level  
s, threaten to eliminate a plant  
2779 or animal community, reduce the num  
ber or restrict the range of a rare  
or endangered plant or  
2780 animal, or eliminate important exam  
ples of the major periods of Califo

3190 human beings, either directly or in  
directly?  
3191  
3192  
3193  
3194  
3195  
3196 Vacation Rentals Ordinance PAGE 66  
City of Los Angeles  
3197 Initial Study June 2020  
3198  
3199  
3200  
3201 a) Does the project have the  
potential to substantially degrade  
the quality of the  
3202 environment, substantially reduce t  
he habitat of a fish or wildlife sp  
ecies, cause a fish or  
3203 wildlife population to drop bel  
ow self-sustaining levels, threa  
ten to eliminate a plant or  
3204 animal community, substantially re  
duce the number or restrict th  
e range of a rare or  
3205 endangered plant or animal or  
eliminate important examples of  
the major periods of  
3206 California history or prehistory?  
3207 No Impact. For the reasons stated i  
n this Initial Study, the Project w  
ould not have the potential  
3208 to degrade the quality of the  
environment, substantially reduce  
the habitat of fish or wildlif  
e  
3209 species, cause a fish or wildl  
ife population to drop below s  
elf-sustaining levels, threaten  
to  
3210 eliminate a plant or animal co  
mmunity, reduce the number or  
restrict the range of a rare  
or  
3211 endangered plant or animal, or elim  
inate important examples of the mai

pieces of the major periods of California history or prehistory.

2781 No new development is expected to occur for the reasons set forth above.

2782 As discussed in Section V (Cultural Resources), and Section XVIII (Tribal Cultural Resources),

2783 the Project would have no impacts to archaeological and paleontological resources and tribal

2784 cultural resources. No further analysis is required.

2785

2786 b) Does the project have impacts that are individually limited, but cumulatively

2787 considerable? ("Cumulatively considerable" means that the incremental effects of a

2788 project are considerable when viewed in connection with the effects of past projects, the

2789 effects of other current projects, and the effects of probable future projects)?

2790 No Impact. For the reasons stated in this Initial Study, the Project would not potentially result in

2791 any significant impacts and would not have the potential to contribute to cumulative impacts.

2792

2793 c) Does the project have environmental effects which will cause substantial adverse

2794 effects on human beings, either directly or indirectly?

2795 No Impact. For the reasons stated in this Initial Study, the Project would not potentially cause

2796 substantial effects on human beings, either directly or indirectly.

include important examples of the major periods of California

3212 history or prehistory. No new development is expected to occur for the reasons set forth above.

3213 As discussed in Section V (Cultural Resources), and Section XVIII (Tribal Cultural Resources),

3214 the Project would have no impacts to archaeological and paleontological resources and tribal

3215 cultural resources. No further analysis is required.

3216

3217 b) Does the project have impacts that are individually limited, but cumulatively

3218 considerable? ("Cumulatively considerable" means that the incremental effects of a

3219 project are considerable when viewed in connection with the effects of past projects, the

3220 effects of other current projects, and the effects of probable future projects)?

3221 No Impact. For the reasons stated in this Initial Study, the Project would not potentially result in

3222 any significant impacts and would not have the potential to contribute to cumulative impacts.

3223

3224 c) Does the project have environmental effects which will cause substantial adverse

3225 effects on human beings, either directly or indirectly?

3226 No Impact. For the reasons stated in this Initial Study, the Project would not potentially cause

3227 substantial effects on human beings, either directly or indirectly.

2797

2798 CONCLUSION

2799 Based upon the information set forth above, in the staff report related to this Project and the

2800 substantial evidence contained in the whole of the record of proceedings, the City has

2801 determined that the adoption of this ordinance could not have a significant effect on the

2802 environment and a Negative Declaration may be adopted.

2803

2804

2805

3228

3229 CONCLUSION

3230 Based upon the information set forth above, in the staff report related to this Project and the

3231 substantial evidence contained in the whole of the record of proceedings, the City has

3232 determined that the adoption of this ordinance could not have a significant effect on the

3233 environment and a Negative Declaration may be adopted.

3234

3235

3236

# Attachment C

PUBLICATION OF ENVIRONMENTAL NOTICES

LOS ANGELES TIMES

THURSDAY, JUNE 4, 2020

Notice is hereby given to the general public of the availability for public review and comment on the following Environmental documents. This publication is intended to serve as our Notice of Intent to adopt the following Negative Declaration (ND). Documents are also available online at the Dept. of City Planning's website <http://cityplanning.lacity.org/development-services/negative-declaration-public-notice>.

CD indicates Council District, sf indicates square feet

-

**NEGATIVE DECLARATION: ENV-2019-7046**. Citywide. CD All. Vacation Rentals Ordinance is an ordinance that establishes regulations to permit use of certain non-primary residences as short-term Vacation Rental units. As discussed in more detail in Project Description, proposed ordinance includes several limitations on number of Vacation Rentals that will be permitted to operate in the City, including caps on number of Vacation Rental permits available citywide & in each community plan area, allowing an individual or entity to obtain only one Vacation Rental permit, & allowing only owners of a dwelling unit to be eligible to obtain a Vacation Rental permit. Additionally, proposed ordinance prohibits units subject to the Rent Stabilization Ordinance (RSO), units subject to affordable housing covenants or otherwise income restricted, Accessory Dwelling Units, & buildings that have been removed from rental market through Ellis Act within the past 7 years from being used for Vacation Rentals. Furthermore, proposed ordinance establishes distancing requirements between Vacation Rentals, limits number of Vacation Rentals that may be allowed in any individual building, & establishes a maximum number of days that a dwelling unit may be rented as a Vacation Rental in a calendar year. Proposed ordinance establishes a process for Vacation Rental permit application, renewal, suspension & revocation, establishes standards & requirements for both Vacation Rental permittees & hosting platforms, directs a portion of Transient Occupancy Taxes and/or per-night fees derived from Vacation Rentals to Short Term Rental Enforcement Trust Fund, & establishes fees & fines. Collectively, this is referred to as City's proposed Vacation Rental Ordinance Project ("Project"). Please call (213)978-1370 to review file. You can email your comments to: [patrick.whalen@lacity.org](mailto:patrick.whalen@lacity.org). REVIEW/COMMENT period begins 6/4/20 & ends on 7/6/20

# Vacation Rentals Ordinance

## Summary

<b>SCH Number</b>	2020060261
<b>Lead Agency</b>	Los Angeles, City of <i>(City of Los Angeles)</i>
<b>Document Title</b>	Vacation Rentals Ordinance
<b>Document Type</b>	NEG - Negative Declaration
<b>Received</b>	6/12/2020
<b>Project Applicant</b>	City of Los Angeles
<b>Present Land Use</b>	Citywide enabling ordinance

---

**Document Description** The Vacation Rentals Ordinance is an ordinance that establishes regulations to permit the use of certain non-primary residences as short-term Vacation Rental units.

---

**Contact Information** Patrick Whalen  
City of Los Angeles  
  
200 N. Spring St.  
Los Angeles, CA 90012  
  
Phone : (213) 978-1370  
  
patrick.whalen@lacity.org

## Location

<b>Cities</b>	Los Angeles
<b>Counties</b>	Los Angeles
<b>Regions</b>	Citywide
<b>Cross Streets</b>	CITYWIDE

## Notice of Completion

<b>Review Period Start</b>	6/12/2020
<b>Review Period End</b>	7/13/2020
<b>Local Action</b>	Other Action
<b>Reviewing Agencies</b>	California Air Resources Board California Baldwin Hills Conservancy California Coastal Commission California Department of Conservation California Department of Fish and Wildlife, South Coast Region 5

- California Department of Housing and Community Development
- California Department of Parks and Recreation
- California Department of Transportation, District 7
- California Department of Transportation, Division of Aeronautics
- California Department of Water Resources
- California Governor's Office of Emergency Services
- California Highway Patrol
- California Native American Heritage Commission
- California Natural Resources Agency
- California Public Utilities Commission
- California Regional Water Quality Control Board, Los Angeles Region 4
- California State Lands Commission
- Office of Historic Preservation
- San Gabriel and Lower Los Angeles Rivers and Mountains Conservancy
- State Water Resources Control Board, Division of Drinking Water
- State Water Resources Control Board, Division of Water Quality
- State Water Resources Control Board, Division of Water Rights

## Attachments

### Environmental Document

- VR NOI **PDF** **618 K**
- VRO Initial Study Negative Declaration **PDF** **2508 K**
- VRO Summary Form **PDF** **188 K**

### NOC

- VRO NOC **PDF** **175 K**

**Disclaimer:** The Governor's Office of Planning and Research (OPR) accepts no responsibility for the content or accessibility of these documents. To obtain an attachment in a different format, please contact the lead agency at the contact information listed above. You may also contact the OPR via email at [state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov) or via phone at (916) 445-0613. For more information, please visit [OPR's Accessibility Site](#).

# Attachment D

# 1456 Sunset Plaza Dr.

Permit denied 2019

Current listings on VRBO and Peerspace

<https://www.peerspace.com/pages/listings/5accd0de1794361a00d36a79>

<https://www.vrbo.com/2106951>

<http://luxuryhomerental.com/properties/40-the-lew-house/>

September 2020 (patrol dealt with it)

September 2019

# 8981 St. Ives

House belongs to Bruno and Kyara Mascolo (9366 Flicker) but is used by their son.

12/2/20 2245 LAPD incident 5111

11/21/20 early am another party more calls

11/20/20 early am multiple calls to LAPD

Party 10/17 Night. Ruis called in but used 8987 as the address.

Party 11/19 - 11/20 with fights and property damage

# 1677 Doheny

11/26/20 0100 LAPD incident #0177

11/23/20 0045 Ruis calls LAPD incident # 0115

11/1/20 2230 Ruis calls LAPD incident 4453

Issues June 2020

# 1831 Marcheeta

11/23/20 0030 LAPD incident #0086

10/31-11/1/20 Ruis calls LAPD

10/23/20 0440 ARIVED AT 1821 MARCHEETA PL TALKED TO ROBERTA WENT TO HER BACK  
YARD WHERE YOU COULD HEAR THE MUSIC AND PEOPLE TALKING CALLE LAPD INCEDENT#0791

10/1/20 0043 Ruis tries to shut down, calls LAPD, LAPD does not arrive

9/19/20 2310 Ruis calls LAPD - citation

9/18/20 2345 Ruis calls LAPD

9/17/20 2210 Ruis calls LAPD

9/15/20 0230 Ruis calls LAPD re party

9/13/20 0025 Ruis calls LAPD re party

# 1525 Blue Jay Way

December 2020 -

Hearing from Joan that this is a problem again

11/15/20 2215 Ruis calls LAPD incident # 4024

July 2020 from Don Kreindler:

saturday/sunday july 18/19

small group gathered mid to late afternoon, all exterior doors open to rear decks, about 10/15 people, talking, hot tubbing, no noticeable music. staff of 3 dressed in red pants and black shirts. group size increased post sunset. i called complaint party line (non-emergency police) at 2 AM and reported with incident number 0482. i also called southwest dispatch number and reported. approximately 40-50 people. police called me back at 2:40 AM and party disbanded around that time. when i awoke at 6 AM, small group still chatting away until 7 AM.

monday july 20

small group gathered late afternoon into the evening until at least 11 PM (when i went to bed) but it did not escalate

tuesday/wednesday july 21/22

small group gathered late afternoon/early evening. 3 staff in red pants and black shirts. group size increased sometime post 11 PM. finally at 3 AM, i called complaint party line as group was extremely loud and now numbered in excess of 50. incident number 0044. i left my name and number and she asked me if i wanted to meet police. i said i did not. maybe that is why i did not get a call back and/or why police did not come. also sports cars racing up and down streets which i did not report. my spouse called at 4 AM but did not get an incident number. now there was music playing quite loudly and talking/shouting/whooping was over the top loud. party was disbanded around 4:30/4:45AM, assuming it was the police arriving but

Jne 6, 2020

From Joan Hushahm April 2020:

I am reporting a party house problem with 1525 Blue Jay way.

There was a couple weekends in March where loud music was playing all night long until 5 a.m.

Today, April 3rd, the House is occupied again, and the loud music has started at 5 pm.

I live at 1532 Skylark Lane, Los Angeles CA 90069 , below this problem house. 310-927-0303.

Attached please find a video that captures the rap music.

Please feel free to contact me.

In may also according to Joan

# 9219 Robin

0250 11/15/20 LAPD incident # 0603

0100 08/28/20 Ruis calls LAPD on party

# 9145 St. Ives

<http://luxuryhomerental.com/properties/124-villa-ives/>

Tik Tok House

Problem fall 2020

11/1/20 2340 Ruis calls LAPD incident 4749

10/25-10/26 Ruis calls LAPD

# 1544 Doheny

11/1/20 2310 Ruis calls LAPD incident 4607

# 9115 Cordell

Flaring up November 2020

11/21/20 340 am Ruis calls LAPD

Alison has been warning me about this one for days

11/1/20 540 am Ruis calls LAPD

# 1836 Doheny

HSR19-02217

10/30/20 Ruis calls LAPD

# 1654 Doheny

11/1/20 Early AM Ruis calls LAPD

# 1814 Marcheeta

10/31-11/1/20 - Ruis calls LAPD

10/24-10/25/20 - Ruis calls LAPD

09/19/20 2230 Ruis calls LAPD - party gets shut down

09/19/20 0155 Ruis calls LAPD

08/30/20 305 Ruis calls LAPD, Madeline too: Incident # 20083000000 644

7/4/2020

# 1324 Sunset Plaza Dr.

10/24-10/25/20 Ruis calls LAPD on "massive party"

Party July 18, 2019

# 1734 Doheny

10/24/20

Ruis called LAPD

# 1680 Sunset Plaza Drive

Home share permit # 19-02788

<http://luxuryhomerental.com/properties/485-sunset-plaza/>

August 2020 - Madelynn says she's been getting calls about this house

# 8827 Evanview

<http://luxuryhomerental.com/properties/32e-hollywood-villa-2/>

HSR 19-04882

Airbnb listing active as of December 2020

Spring 2019, Summer 2020

# 8835 Evanview

HSR 19-004882 - Still listed

Airbnb listing active as of December 2020

<http://luxuryhomerental.com/properties/31e-hollywood-villa-1/>

Summer 2020

Summer 2019

# 1305 Collingwood

Listed as an event rental

<http://luxuryhomerental.com/properties/209e-collingwood-place/>

In June 2020 Jennifer Wade says that parties have started again. She says this has been happening since it was built.

Epic party Jun 2019

# 1601 Rising Glen

<http://luxuryhomerental.com/properties/117-rising-glen/>

10/4/20 0345 Ruis calls in party. LAPD does not make it.

August 6, 2020

# 8356 Sunset View

<http://luxuryhomerental.com/properties/116-led-sunset/>

October 21, 2020

Report of police responding to fight at party

I think this is the one that had the power shut off or major action by Ethan.

Big party May 20, 2020

# 1606 Viewmont

Homeshare permit denied

numerous summer and fall 2020 citations

Incident 7/10/19

## 1606 VIEWMONT DRIVE 7-10-2019 Party AGAIN!



Inbox x Party Houses x



**Gary Manning**

Jul 10, 2019, 9:26 PM (2 days ago)



to Benjamin, Ethan, Madelynn, Mitchell, me, James, Eric ▾

Good Evening,

Just a heads up 1606 Viewmont Drive is having a party again.

The Notice of Violation has not been replaced and The neighbors don't know why this rental is allowed to keep having parties.

Ben would you be so kind and have the Notice of Violation posted Again -Please.

I know you all are busy and we Thank You for your help with this matter.

Be Safe,  
Darby and Gary Manning

# 1614 Viewmont

Home share permit denied

2019

7/18/2020

# 1602 Viewmont

Home share permit denied

2019

# 1240 Sierra Alta

Permit denied.

10/16/20-10/17/20 Party LAPD phoned

February 12, 2020

September 29, report of big party planned (Greg)

September 6, 2019 - House is sold, parties start. Said that house bought not to live in but just for parties

# 1714 Queens Court

HSR19-1680

Problem airbnb. Up for sale fall 2020

# 1410 Miller Drive

Homeshare permit appears to have been revoked

Cease and desist letter August 2020

Thursday 4/30 - Incident 403

Saturday 5/16 - Incident 5648 (shooting)

Sunday 5/17 - Incident 3744

Sunday 5/24 - Incident 5547

June 6, 2020

Saturday 6/27 - Incident 5203

Sunday 6/28 - Incident 5831

Monday 6/29 - Incident 87

Wednesday 7/15 - Incident 52 and Incident 75

Sunday 7/19 - Incident 3768

LAPD INCIDENT # 404. 7-22-2020 PARTY VERY LOUD MUSIC didn't stop until 4:15 AM

LAPD INCIDENT # 5493 7-22-2020

LAPD INCIDENT # 3340 7-25-2020 PARTY VERY LOUD MUSIC with loud amplified music  
CITY OF LOS ANGELES NOTICE OF VIOLATION

7/26/2020 don't have incident #

LAPD INCIDENT # 1735 8-10-20. PARTY LOUD MUSIC

LAPD INCIDENT # 5607 8-12-2020. PARTY LOUD MUSIC and YELLING

LAPD INCIDENT # 0042 8-24-2020 or 08-25-2020. PARTY LOUD MUSIC

## 8-27-2020 - Incident 0568

# 9238 Kinglet

Kai Yee Airbnb

HSR 20-00475

Problems late 2019, summer 2020

# 8666 Hollywood

Home sharing permit denied.

October 22, 2020 100 report of shots fire

Late summer/fall 2020.

Gunshots at one party. Videos in email.

# 8613 Hollywood

Flaxman owns. Home sharing permit denied.

10-9-2020 CITY OF LA NOTICE OF VIOLATION TAMPERING WITH/OBSCURING POSTED NOTICE  
LAPD COHEN # 40760

9-26-2020 LAPD INCIDENT # 4633

10-4-2020. LAPD INCIDENT # 0555

0-8-2020 CITY OF LOS ANGELS NOTICE OF VIOLATION 10-8-2020 Removal of Violation Notice Prior to 80 Days LAPD  
Cohen # 40760

Spring 2019 as well

Summer 2018 (with fireworks!)

# 1651 Haslam

This has a current home sharing permit and is listed on Maimon.

From Sept 8, 2020

Ellen

We had another large and unruly party last night at 1651 Haslam. This time a Rapper launch party. Police came on two separate occasions. They now have a yellow notice, a citation and a warning and final warning for water and power Turn off and c of o revocation.

Last night traffic congestion was so bad to the party that SPD was backed up past Viewsite. To top it off, there was an emergency and 5 fire trucks and an ambulance were stuck from tending to an emergency further up SPD. Literally a perfect storm.

I have texted Ryu this morning on behalf of all Haslam residents demanding that they invoke the mayor's shut off policy and revoke the c of o. Can you help with that?

Michael

Sent from my iPhone

Also August 21

# 8435 Franklin

Home sharing permit denied

Problem August 2019

# 8445 Franklin

HSR-19-005296

Airbnb listing inactive as of 12/2020

This is the one owned by Steven Chao. Neighbors have communicated with him. Problem summer 2020.

# 8544 Franklin

HSR 20-000643

Apparently another summer 2020 problem. Michael Mekeel interacts with city re this one.

# 9105 Cordell

Was on airbnb, removed.

Joseph and Davana Fryzer

Intermittent issues

# 8437 Carlton Way

Michel Amar owner. Intermittent problem over years.

Denied home share permit. Airbnb listing no longer active.

2/17/18 - Margaret Black notified DSPNA of issues. Haul route discussions were ongoing then, and the parties were a problem.

Here are some 2020 dates from Terence Chavers and Darby Manning:

Monday 4/27 - Incident 207

Thursday 4/30 - Incident 403

Sunday 5/31 - Incident 3479

Saturday 6/13 - Incident 4500

Sunday 6/21 - Incident 239

Saturday 6/27 - Incident 259 Also Incident 279

Tuesday 6/30 - Incident 5099

Wednesday 7/8 - Incident 4722

Saturday 7/11 - Incident 4419

Saturday 7/18 - Incident 5057

9-26-2020 LAPD INCIDENT # 4633

10-4-2020. LAPD INCIDENT # 0555

10-8-2020 CITY OF LOS ANGELS NOTICE OF VIOLATION 10-8-2020 Removal of Violation Notice Prior to 80 Days LAPD

Cohen # 40760

# 1464 Sunset Plaza Dr.

<https://www.vrbo.com/2106951>

Unclear whether valid home share permit in place

August, 2020

December 4, 2020 - LAPD called

# 1660 Queens Road

11/6/20 LAPD Incident 319 - apparently having loud parties once a week

10/31 - Notice of violation

**1610**

7/18/2020

# 1506 Blue Jay Way

11/13/2020

Parties are frequent according to Beth Fogarty, and there is a charge at the door.

# 1440 Sunset Plaza Drive

Allegedly airbnb

July 25, 2020

# 8262 Woodhill Trail

VRBO 1713997

Party October 24/25, 2020 with gunshot report mostly high school kids

# 1232 Sunset Plaza Drive

October 24/25, 2020 per Brad Pollard

House used a lot for filming

# 9200 Swallow

11/20 party called in & cited resident "too drunk to come to door" per SLO Wolfchief

Ruis calls in party 10/16-10/17/2020. Reports party car on location.

9/11/2020 2230 Ruis calls in party - LAPD shuts down (citation)

9/4/2020 0040 Ruis calls in party

# 8195 Hollywood Blvd

City of Los Angeles Notice of Violation 9-4-2020 Party loud music, loud party

LAPD B.White 38074

This is the house that usually has overflowing trash.

Notice of violation, September 2020

It's a tik tok house "honey house"

# 1571 Kings

1571 Queens Road City of Los Angeles Notice of Violation 8-30-2020

loud unruly party/ screaming amplified music Cohen # 40760

Initial Warning of Noncompliance with the City of Los Angeles Safer LA order

3:AM LAPD Cohen # 40760

# 8469 Hillside

Reported as a problem August 2020

# 1474 Queens

10-11-2020 CITY OF LA NOTICE OF VIOLATION LOUD MUSIC,LOUD VOICES, UNRULY GATHERING LAPD MEJIA #36183

10-11-2020 CITY OF LOS ANGELES INITIAL WARNING OF NONCOMPLIANCE WITH THE CITY OF LOS ANGELES SAFER  
LA ORDER

LAPD OFFICER MEJIA #36183 1:AM

# 1501 Kings

10-11-2020 CITY OF LA NOTICE OF VIOLATION LOUD/ UNRULY PARTY LAPD COHEN # 40760

10-11-2020 CITY OF LOS ANGELES INITIAL WARNING OF NONCOMPLIANCE WITH THE CITY OF LOS ANGELES SAFER  
LA ORDER

LAPD OFFICER BRETT COHEN # 40760 12:40 AM

# 9369 Flicker

Fireworks July 4, 2019

# 9304 Warbler Way

Problem summer 2019 in conjunction with attempt to do planning shenanigans on border of la and bh.

# 9146 St. Ives

Problems early 2019 - rented to young instagram skateboard star

# 9066 St. Ives

Alison reports that tenants may have moved out 10/20/20

Here is the link for evidence from this locations:

<https://drive.google.com/drive/folders/1yTvayehmFMiPj0l37LXW8jbsleAuqxOY?usp=sharing>

10/18/20:

Final Safer LA citation

Numerous violations

Fireworks

Underground nightclub

Weirdly silent gigantic parties

# 8854 Thrasher

Summer 2020

# 8721 Sunset Plaza Terrace

This was rented by the guy who crashed his lambo into the Harris's garage.

Spring, Summer 2019

# 8637 Franklin

Winter 2018, Spring 2019

**8623 Franklin**

KWON

# 8575 Franklin

Problem fall 2017

# 8412 Carlton Way

Problem December 2019

# 8242 Hillside

August 2020


Past problem

# 1830 Blue Heights

Vacant lot. Constant partying.

# 1814 Doheny

|

Start writing, drag files, or choose a  Template

# 1733 Sunset Plaza Drive

LAPD called 130 am July 28, 2020

Referred to by Mitch as past problem

May 16/17 2020 party not called in

# 1640 Kings

June 13, 2020

Report of big party on next-door

# 1501 Viewsite

8/17/20 0032 Ruis responded to party

# 1235 Sierra Alta (Prince House)

10/16/20-10/17/20 Reported by Greg Ainsworth

8/8/20 - LAPD called - got citation, I think

Long history of problems

# 1536 Blue Jay Way

9/23/20 2340 Ruis calls LAPD. party buses. LAPD doesn't make it.

September 2020

# 1414 Mockingbird

10/10/2020 2235 Ruis called. Cohen was on patrol. Called again 0425 on 10/11 incident 0877

# 1632 Mountcrest

Sold 2019

# 1628 Sunset Plaza Drive

July 2020 Problem again according to Keith Samuels

Fall 2019

# 1623 Viewmont

2018

# 1599 Sunset Plaza Dr.

Summer 2019

# 1571 Queens

City of Los Angeles Notice of Violation 8-30-2020 unruly party

City of Los Angeles initial warning of Noncompliance with City of Los Angeles Safer LA order 8-30-2020

# 1550 Blue Jay Way

2017

# 1467 Kings

2017

# 1516 Kings

2017

# 1516 Doheny

October 6, 2020

# 1474 Blue Jay Way

October 3, 2020

August 2020

June 2020

# 1451 Blue Jay Way

Summer 2019

# 1383 Londonderry

July 6, 2020

July 4, 2020

# 1369 Londonderry

Owned by Nile Niami

Huge list of problems, many citations

Ralph went to the house to talk to Niami before his 2020 leave and Niami did not answer

October 3, 2020 Elyane reports two parties citations

September 26, 2020 Citation

June 28, 2020

June 18, 2020 Filming/Party?

October 4, 2019 Citation

March 7, 2019

Many others

# 1317 Londonderry

Tad reports unloading party stuff September 1, 2020 but no calls ever went in to LAPD that night

Elyane reports history of problems plus party May 22, 2019

# 1470 Blue Jay Way

10/4/20 0130 Ruis calls in party

# 1506 Doheny Dr.

10/4/20 0040 Ruis calls LAPD on party

# 1401 Oriole Way

10/14-10/15/20 Officer Ruis reported party

# 9248 Swallow

Ruis calls in party 10/16-10/17/20. Same night as 9200 party. Two parties?

# 1895 Rising Glen

Ruis reports party on 10/16-10/17/20

# 1368 Doheny Place

10/17/20

Patrol called at 1150 pm for party.

# Attachment E

From: **Ellen Evans** <[eevans@babnc.org](mailto:eevans@babnc.org)>  
Date: Sun, Dec 27, 2020 at 2:23 PM  
Subject: Fwd: California Public Records Act Request - Home Sharing  
To: <[dspna@dspna.org](mailto:dspna@dspna.org)>

On December 22, 2020 at 8:01:21 AM, Beatrice Pacheco ([beatrice.pacheco@lacity.org](mailto:beatrice.pacheco@lacity.org)) wrote:

Hello, Ms. Evans:

Attached are the records for #s 1 through 3 of your request.

For items 4 and 5: LA City Planning's Home-Sharing has not suspended or revoked any registration. We are attaching the links for the Home-Sharing Ordinance and Administrative Guidelines for you to review the suspension and revocation guidelines.

Ordinance: <https://planning.lacity.org/ordinances/docs/homesharing/adopted/Final%20Ordinance.pdf>

Guidelines: [https://planning.lacity.org/odocument/bf5980e9-2505-4046-9d7f-855899a99612/HSO\\_Admin\\_Guidelines.pdf](https://planning.lacity.org/odocument/bf5980e9-2505-4046-9d7f-855899a99612/HSO_Admin_Guidelines.pdf)

Have a good day.



**Beatrice Pacheco**  
Chief Clerk  
**Los Angeles City Planning**  
**Records Management**  
221 N. Figueroa St., Room 1450  
Los Angeles, CA. 90012  
[Planning4LA.org](http://Planning4LA.org)  
T: (213) 847-3732 | F: (213) 269-4127



----- Forwarded message -----

From: **Ellen Evans** <[eevans@babnc.org](mailto:eevans@babnc.org)>  
Date: Sun, Dec 13, 2020 at 11:40 AM  
Subject: California Public Records Act Request - Home Sharing  
To: <[beatrice.pacheco@lacity.org](mailto:beatrice.pacheco@lacity.org)>

Dear Ms. Pacheco:

I am requesting access to records in possession or control of the Planning Department of the City of Los Angeles for the purposes of inspection and copying pursuant to the California Public Records Act, California Government Code § 6250 et seq. ("CPRA"), and Article I, § 3(b) of the California Constitution. The specific records I seek to inspect and copy are listed below.

- 1) Record of applications for homesharing permits in zip codes 90046, 90069, 90077 and 90210 including the name of the applicant/host as well as the property address.
- 2) Record of approved applications for homesharing permits in zip codes 90046, 90069, 90077 and 90210 which include the name of the applicant/host, the address of the property, and the titles/types of documents submitted in connection with permit application.
- 3) Record of denied applications for homesharing permits in zip codes 90046, 90069, 90077 and 90210 including identifying information.
- 4) Records of suspended home sharing permits, including dates of suspension.
- 5) Records of revoked home sharing permits, including date of revocation.

If you contend that any portion of the records requested is exempt from disclosure by express provisions of law, Government Code § 6253(a) requires segregation and redaction of that material in order that the remainder of the records may be released. If you contend that any express provision of law exists to exempt from disclosure all or a portion of the records I have requested, Government Code § 6253(c) requires that you notify me of the reasons for the determination not later than 10 days from your receipt of this request. Government Code §§ 6253(d) & 6255(b) require that any response to this request that includes a determination that the request is denied, in whole or in part, must be in writing and include the name and title of the person(s) responsible for the City's response.

Government Code § 6253(d) prohibits the use of the 10-day period, or any provisions of the CPRA or any other law, "to delay access for purposes of inspecting public records."

In responding to this request, please keep in mind that Article 1, § 3(b)(2) of the California Constitution expressly requires you to broadly construe all provisions that further the public's right of access, and to apply any limitations on access as narrowly as possible.

If I can provide any clarification that will help expedite your attention to my request, please contact me at [provide phone or email address], pursuant to Government Code § 6253.1. I ask that you notify me of any duplication costs exceeding \$xx before you duplicate the records so that I may decide which records I want copied.

Thank you for your timely attention to this matter.

Best regards,

Ellen Evans  
Bel Air-Beverly Crest Neighborhood Council  
Vice President, Operations  
Chair, Outreach Committee  
Co-chair, Home-Sharing and Party House Ordinance Committee

--



LOS ANGELES  
CITY PLANNING

**Wanda Walker**  
Principal Clerk  
**Los Angeles City Planning**  
**Records Management Unit**

221 Figueroa St., Suite 1450  
Los Angeles, CA. 90012  
Planning4LA.org  
T: (213) 847-3738 | F: (213) 269-4127



--



From: **Bob Duenas** <[bob.duenas@lacity.org](mailto:bob.duenas@lacity.org)>  
Date: Mon, Dec 14, 2020 at 7:37 AM  
Subject: Re: Enforcement Questions  
To: Ellen Evans <[dspna@dspna.org](mailto:dspna@dspna.org)>  
Cc: Phyllis Nathanson <[Phyllis.Nathanson@lacity.org](mailto:Phyllis.Nathanson@lacity.org)>

- Has any listing site/platform been fined for non-conforming listings?  
*No fines have been issued, we work with the platforms and mostly Hosts to remove non-compliant listings.*
- Would the ordinance allow for multiple \$1000/non-conforming listing fines per day?  
*We have not gotten into multiple fines as we have not reached that stage.*
- Does anybody check whether the required language re:smoking, etc. is included in listings in high fire hazard severity zones?  
*The Ordinance was written as to allow self certification for such compliance*
- Does anybody check whether required notices are posted on-site?  
*The Ordinance was written as to allow self certification for such compliance*
- Have fine amounts been adjusted for inflation as per the ordinance?  
*No inflation adjustment was built into the ordinance.*



**Robert Z. Duenas**  
Principal City Planner  
**Los Angeles City Planning**

201 N, Figueroa St. rm. 525  
Los Angeles, CA. 90012  
[Planning4LA.org](http://Planning4LA.org)  
T: (213) 202-5424 |  
Primary C: (213) 359-7916  
Alt C: (805) 380-6049



On Fri, Dec 11, 2020 at 3:15 PM Ellen Evans <[dspna@dspna.org](mailto:dspna@dspna.org)> wrote:  
Hi, Phyllis and Bob:

I had a few enforcement questions about the home sharing ordinance that I hope you can help me answer.

- Has any listing site/platform been fined for non-conforming listings?
- Would the ordinance allow for multiple \$1000/non-conforming listing fines per day?
- Does anybody check whether the required language re:smoking, etc. is included in listings in high fire hazard severity zones?
- Does anybody check whether required notices are posted on-site?
- Have fine amounts been adjusted for inflation as per the ordinance?

Thanks so much for your help with understanding enforcement.

Best regards,  
Ellen Evans

--



# Attachment F

Maimon Group #	Permit #	Title	Address (or preliminary location notes)	Link	
	3	Sky Castle	2260 Sunset Plaza Drive	<a href="http://luxuryhomerental.com/properties/sky-castle-2/">http://luxuryhomerental.com/properties/sky-castle-2/</a>	
	21 denied	Belgrave	8228 Bellgave	<a href="http://luxuryhomerental.com/properties/21-belgrave-place/">http://luxuryhomerental.com/properties/21-belgrave-place/</a>	
	31	Hollywood Villa 1/Sunset Plaza	8835 Evanview Drive	<a href="http://luxuryhomerental.com/properties/31-sunset-plaza-2/">http://luxuryhomerental.com/properties/31-sunset-plaza-2/</a>	
	32	Hollywood Villa 2	8827 Evanview Drive	<a href="http://luxuryhomerental.com/properties/32-evanview/">http://luxuryhomerental.com/properties/32-evanview/</a>	
	37	Viewmont	1623 Viewmont Dr.	<a href="http://luxuryhomerental.com/properties/37-viewmont/">http://luxuryhomerental.com/properties/37-viewmont/</a>	
	38 HSR19-002788 (not displayed)	Sunset Plaza	1680 Sunset Plaza Drive	<a href="http://luxuryhomerental.com/properties/38-sunset-plaza-2/">http://luxuryhomerental.com/properties/38-sunset-plaza-2/</a>	
	40 denied	The Lew House	1456 Sunset Plaza Drive	<a href="http://luxuryhomerental.com/properties/40-the-lew-house/">http://luxuryhomerental.com/properties/40-the-lew-house/</a>	
	49 denied	Sunset Plaza	1653 Sunset Plaza Drive	<a href="http://luxuryhomerental.com/properties/49-sunset-plaza-drive/">http://luxuryhomerental.com/properties/49-sunset-plaza-drive/</a>	
	51 denied	Franklin 2	8469 Franklin	<a href="http://luxuryhomerental.com/properties/51-franklin-2/">http://luxuryhomerental.com/properties/51-franklin-2/</a>	
	59	Hillside Villa	8469 Hillside Ave.	<a href="http://luxuryhomerental.com/properties/hillside-villa/">http://luxuryhomerental.com/properties/hillside-villa/</a>	
	86 denied	Viewmont	1602 Viewmont	<a href="http://luxuryhomerental.com/properties/86-viewmont/">http://luxuryhomerental.com/properties/86-viewmont/</a>	
	89 denied	Kings Villa	1432 Kings	<a href="http://luxuryhomerental.com/properties/89-kings-villa/">http://luxuryhomerental.com/properties/89-kings-villa/</a>	
	104 denied	Viewmont Dr.	1606 Viewmont Drive	<a href="http://luxuryhomerental.com/properties/104-viewmont-dr/">http://luxuryhomerental.com/properties/104-viewmont-dr/</a>	
	108	Sunset Hands	1489 Stebbins Terrace	<a href="http://luxuryhomerental.com/properties/108-sunset-hands/">http://luxuryhomerental.com/properties/108-sunset-hands/</a>	
	112	WeHo House	8159 Hollywood Blvd.	<a href="http://luxuryhomerental.com/properties/112-weho-house/">http://luxuryhomerental.com/properties/112-weho-house/</a>	
	116	LED Sunset	8356 Sunset View Dr	<a href="http://luxuryhomerental.com/properties/116-led-sunset/">http://luxuryhomerental.com/properties/116-led-sunset/</a>	
	117	Rising Glen	1895 Rising Glen	<a href="http://luxuryhomerental.com/properties/117-rising-glen/">http://luxuryhomerental.com/properties/117-rising-glen/</a>	
	124 denied	Villa Ives	9145 St Ives	<a href="http://luxuryhomerental.com/properties/124-villa-ives/">http://luxuryhomerental.com/properties/124-villa-ives/</a>	
	142	Sunset Plaza	1733 Sunset Plaza Drive	<a href="http://luxuryhomerental.com/properties/142-sunset-plaza/">http://luxuryhomerental.com/properties/142-sunset-plaza/</a>	
	149	Mockingbird Estate	1380 Mockingbird	<a href="http://luxuryhomerental.com/properties/149-mockingbird-estate/">http://luxuryhomerental.com/properties/149-mockingbird-estate/</a>	
	173 HSR19-003682	Sunset Plaza Hub	2183 Sunset Plaza Dr.	<a href="http://luxuryhomerental.com/properties/173-sunset-plaza-hub/">http://luxuryhomerental.com/properties/173-sunset-plaza-hub/</a>	owned by brad keith
	199	Flicker	9323 Flicker Way	<a href="http://luxuryhomerental.com/properties/199-flicker/">http://luxuryhomerental.com/properties/199-flicker/</a>	
	232 denied	Sunset PL Villa	1618 Sunset Plaza Dr.	<a href="http://luxuryhomerental.com/properties/232-sunset-pl-villa/">http://luxuryhomerental.com/properties/232-sunset-pl-villa/</a>	
	233	Sunset Plaza	2231 Sunset Plaza Dr.	<a href="http://luxuryhomerental.com/properties/233-sunset-plaza/">http://luxuryhomerental.com/properties/233-sunset-plaza/</a>	
	236	Playhouse Modern	1525 Blue Jay Way	<a href="http://luxuryhomerental.com/properties/236-playhouse-modern/">http://luxuryhomerental.com/properties/236-playhouse-modern/</a>	
	240	London Dream	1369 Londonderry	<a href="http://luxuryhomerental.com/properties/240-london-dream/">http://luxuryhomerental.com/properties/240-london-dream/</a>	Nile Niemi
	257	Blue Jay View	1506 Blue Jay Way	<a href="http://luxuryhomerental.com/properties/257-blue-jay-view/">http://luxuryhomerental.com/properties/257-blue-jay-view/</a>	
	284	Marmont Estate	8235 Monteel Rd.	<a href="http://luxuryhomerental.com/properties/284-marmont-estate/">http://luxuryhomerental.com/properties/284-marmont-estate/</a>	
	289	Villa Aubrey	1814 Doheny Dr.	<a href="http://luxuryhomerental.com/properties/289-villa-aubrey/">http://luxuryhomerental.com/properties/289-villa-aubrey/</a>	
	365 denied	Sierra Alta	1240 Sierra Alta	<a href="http://luxuryhomerental.com/properties/365-sierra-alta/">http://luxuryhomerental.com/properties/365-sierra-alta/</a>	
	371 HSR19-001529 (not displayed)	Marmont Lane	8276 Woodhill Trail	<a href="http://luxuryhomerental.com/properties/371-marmont-lane/">http://luxuryhomerental.com/properties/371-marmont-lane/</a>	
	398	Stark	9400 Sierra Mar Pl	<a href="http://luxuryhomerental.com/properties/398-stark/">http://luxuryhomerental.com/properties/398-stark/</a>	
	407 denied	Bird Street Mansion	9393 Sierra Mar	<a href="http://luxuryhomerental.com/properties/407-bird-street-mansion/">http://luxuryhomerental.com/properties/407-bird-street-mansion/</a>	Ben Bacal
	426	Shoreham	8971 Shoreham	<a href="http://luxuryhomerental.com/properties/426-shoreham/">http://luxuryhomerental.com/properties/426-shoreham/</a>	
	429	Marlay	1533 Marlay	<a href="http://luxuryhomerental.com/properties/429-marlay/">http://luxuryhomerental.com/properties/429-marlay/</a>	
	466	St. Ivey Modern	9066 St. Ives	<a href="http://luxuryhomerental.com/properties/466-st-ivey-modern/">http://luxuryhomerental.com/properties/466-st-ivey-modern/</a>	
	478	Devlin Modern	1439 Devlin	<a href="http://luxuryhomerental.com/properties/478-devlin-modern/">http://luxuryhomerental.com/properties/478-devlin-modern/</a>	
	480 HSR20-01322 (displayed)	Villa Haslam	1651 Haslam Terrace	<a href="http://luxuryhomerental.com/properties/423-villa-haslam/">http://luxuryhomerental.com/properties/423-villa-haslam/</a>	
	485 HSR20-001467 (not displayed)	Sunset Plaza	1464 Sunset Plaza Dr.	<a href="http://luxuryhomerental.com/properties/485-sunset-plaza/">http://luxuryhomerental.com/properties/485-sunset-plaza/</a>	
	546	Franklin Modern Retreats	8514 Franklin	<a href="http://luxuryhomerental.com/properties/546-franklin-modern-retreats/">http://luxuryhomerental.com/properties/546-franklin-modern-retreats/</a>	

Event only rentals

12E		Nightingale	9353 Nightingale	<a href="http://luxuryhomerental.com/properties/12e-nightingale/">http://luxuryhomerental.com/properties/12e-nightingale/</a>	
18E	NO LONGER ON SITE	Blue Jay	1851 Blue Jay Way	<a href="http://luxuryhomerental.com/properties/18e-blue-jay-hollywood-hills/">http://luxuryhomerental.com/properties/18e-blue-jay-hollywood-hills/</a>	
209E		Collingwood Place	1305 Collingwood Place	<a href="http://luxuryhomerental.com/properties/209e-collingwood-place/">http://luxuryhomerental.com/properties/209e-collingwood-place/</a>	
273E	NO LONGER ON SITE	Rockstar Mansion (sic)	1235 Sierra Alta Way	<a href="http://luxuryhomerental.com/properties/273e-rockstar-mansion/">http://luxuryhomerental.com/properties/273e-rockstar-mansion/</a>	
327E	NO LONGER ON SITE	Crescent Hills	1677 N Crescent Heights Blvd	<a href="http://luxuryhomerental.com/properties/327e-crescent-hills/">http://luxuryhomerental.com/properties/327e-crescent-hills/</a>	

# Attachment G

Registration Number	Registered Address	Registered Unit	Registered Name	Documentation	Registration Type	Status
HSR19-004139	1366 Miller Dr, Los Angeles, CA 90069, USA		Lori Leve		Regular	Approved
HSR20-002403	2144 Sunset Plaza Dr, Los Angeles, CA 90069, USA		Timothy Neavin	CA Driver's License, Pay Statement, Voter Registration Abstract	Regular	Approved
HSR19-001664	1600 Sunset Plaza Dr, Los Angeles, CA 90069, USA		John Eastman		Extended	Approved
HSR20-002002	1335 Londonderry Pl, Los Angeles, CA 90069, USA		Laura Garratt	CA Driver's License, Pay Check	Regular	Approved
HSR19-003028	8641 Metz Pl, Los Angeles, CA 90069, USA		JELENA SPAJIC	CA Driver's License, Vehicle Insurance Bill, Pay Statement, Landlord Affidavit	Extended	Approved
HSR20-000238	1615 Marmont Ave, Los Angeles, CA 90069, USA		Tracy Byer	CA Driver's License, Pay Statement, Landlord Affidavit	Extended	Approved
HSR19-001364	1924 Sunset Plaza Dr, Los Angeles, CA 90069, USA		JOSEPHINE MATILDA GONZALEZ	CA Driver's License, Vehicle Insurance Bill	Extended	Approved
HSR19-003835	1514 1/2 Sunset Plaza Dr, Los Angeles, CA 90069, USA		NONA SUMMERS	CA Driver's License, Property Tax Bill	Regular	Approved
HSR19-001143	8150 Hollywood Blvd, Los Angeles, CA 90069, USA		Marilyn Kweskin	CA Driver's License, Landlord Affidavit, Voter Registration	Regular	Approved
HSR20-000475	9238 Kinglet Dr, Los Angeles, CA 90069, USA		Kal Yee	CA Driver's License, Pay Check, Vehicle Insurance Bill	Extended	Approved
HSR19-004138	8810 Hollywood Blvd, Los Angeles, CA 90069, USA		Savas Siricki	CA Driver's License, Health Insurance Bill, Vehicle Registration	Extended	Approved
HSR19-001485	9285 Flicker Pl, Los Angeles, CA 90069, USA		KENNETH KATSUMOTO	CA Driver's License, Vehicle Registration, Trust Document	Regular	Approved
HSR20-002146	8401 Carlton Way, Los Angeles, CA 90069, USA		STEPHEN YANG	CA Driver's License, Vehicle Registration	Regular	Approved
HSR19-001402	8501 Hillside Ave, Los Angeles, CA 90069, USA		Bernard Gainey	U.S Passport, Vehicle Registration, Vehicle Insurance Bill	Extended	Approved
HSR19-000365	8564 Hillside Ave, Los Angeles, CA 90069, USA		ERIC AVERY	CA Driver's License, Home Sharing Record, Vehicle Registration	Extended	Approved
HSR19-002217	1836 N Doheny Dr, Los Angeles, CA 90069, USA		Matthew Snyder	CA Driver's License, Vehicle Insurance Bill	Regular	Approved
HSR20-002069	8474 Romaine St, West Hollywood, CA 90069, USA	203	Beejan Land	CA Driver's License, Vehicle Insurance Bill, Landlord Affidavit, Vehicle Registration	Regular	Approved
HSR19-002862	1711 Viewmont Dr, Los Angeles, CA 90069, USA		Navid Tebyani	CA Driver's License, Voter Registration	Regular	Approved
HSR19-003682	2183 Sunset Plaza Dr, Los Angeles, CA 90069, USA		BRADLEY KEITH	CA Driver's License, Vehicle Insurance Bill	Extended	Approved
HSR19-000441	1711 Kings Way, Los Angeles, CA 90069, USA		Rami Ettlinger	CA Driver's License, Vehicle Insurance Bill, Vehicle Registration	Extended	Approved
HSR19-000862	1500 Sunset Plaza Dr, Los Angeles, CA 90069, USA		Suzanne Taylor	CA Driver's License, Home Sharing Record, Vehicle Registration	Extended	Approved
HSR19-003002	1664 Sunset Plaza Dr, Los Angeles, CA 90069, USA		Darren Schaeffer	U.S Passport, Vehicle Insurance Bill, Voter Registration	Extended	Approved
HSR19-003048	8440 Franklin Ave, Los Angeles, CA 90069, USA		Adel Ibrahim	CA Driver's License, Vehicle Insurance Bill, Vehicle Registration	Extended	Approved
HSR20-001387	960 N Alford St, Los Angeles, CA 90069, USA	216	JAMES THOMAS CANN	CA Driver's License, Landlord Affidavit, Vehicle Registration	Regular	Approved
HSR19-003116	8614 Hollywood Blvd, Los Angeles, CA 90069, USA		Maximillian Resnik	CA Driver's License, Vehicle Registration, Voter Registration	Extended	Approved
HSR20-001467	1464 Sunset Plaza Dr, Los Angeles, CA 90069, USA		EVAN DAVID ROTHSTEIN	CA Driver's License, Vehicle Insurance Bill	Regular	Approved
HSR19-001918	1354 Miller Pl, Los Angeles, CA 90069, USA		Michael Newman		Extended	Approved
HSR20-001572	8666 Hollywood Blvd, Los Angeles, CA 90069, USA		Anthony Silva	CA Driver's License, Voter Registration, Vehicle Registration	Regular	Approved
HSR20-001724	1821 Sunset Plaza Dr, Los Angeles, CA 90069, USA		Ryan Junee	CA Driver's License, Vehicle Insurance Bill, Pay Statement	Regular	Approved
HSR20-001403	8222 Marmont Ln, Los Angeles, CA 90069, USA		MICHAEL ALBERT MARTIN BRAUN	CA Driver's License, Vehicle Insurance Bill	Regular	Approved
HSR20-001483	1271 St Ives Pl, Los Angeles, CA 90069, USA		Sara Lane	U.S Passport, Health Insurance Bill, Landlord Affidavit, Rental Agreement	Regular	Approved
HSR20-001361	1853 Sunset Plaza Dr, Los Angeles, CA 90069, USA		Nicholas Tershay	U.S Passport, Pay Statement, Property Tax Bill	Regular	Approved
HSR20-001469	9275 Flicker Way, Los Angeles, CA 90069, USA		Michael McQuarn	Texas Driver's License, Pay Statement, Vehicle Insurance Bill	Regular	Approved
HSR20-001401	9386 Sierra Mar Dr, Los Angeles, CA 90069, USA		YETTA LEVITAS	CA Driver's License, Vehicle Registration	Regular	Approved
HSR20-001322	1651 Haslam Terrace, Los Angeles, CA 90069, USA		TAL MAIMON	CA Driver's License, Rental Agreement, Landlord Affidavit Vehicle Registration	Regular	Approved
HSR20-000772	9145 St Ives Dr, Los Angeles, CA 90069, USA		Payam Saadat	CA Driver's License, Vehicle Insurance Bill, Landlord Affidavit Rental Agreement	Regular	Approved
HSR19-001707	1424 N Kings Rd, Los Angeles, CA 90069, USA		Julia Verdin	CA Driver's License, Pay Check, Voter Registration	Regular	Approved
HSR19-001680	1714 Queens Ct, Los Angeles, CA 90069, USA		MONICA WIDMANN	CA Driver's License, Landlord Affidavit, Rental Agreement	Regular	Approved
HSR19-001529	8276 Woodshill Trail, Los Angeles, CA 90069, USA		EMANUELE MASSIMINI	CA Driver's License, Vehicle Registration	Regular	Approved
HSR20-000511	9393 Sierra Mar Dr, Los Angeles, CA 90069, USA		Benjamin Bacal	CA Driver's License, Vehicle Registration, Voter Registration	Regular	Approved
HSR20-001164	2158 Sunset Plaza Dr, Los Angeles, CA 90069, USA		Duccio Mortillaro	CA Driver's License, Vehicle Registration	Regular	Approved
HSR20-000915	1581 Viewsite Dr, Los Angeles, CA 90069, USA		Allison Hamamura	CA Driver's License, Vehicle Insurance Bill	Regular	Approved
HSR20-000562	1117 Sierra Alta Way, Los Angeles, CA 90069, USA		Nicholas Bardi	CA Driver's License, Pay Check, Landlord Affidavit, Rental Agreement	Regular	Approved
HSR20-000760	8634 Hillside Ave, Los Angeles, CA 90069, USA		Jesse C Waits	Nevada Driver's License, Vehicle Registration, Vehicle Insurance Bill	Regular	Approved
HSR20-000844	8827 Evanview Dr, Los Angeles, CA 90069, USA		KIMBERLY GARRETT	CA Driver's License, Pay Statement, Landlord Affidavit, Voter Registration	Regular	Approved
HSR19-005405	1118 N Wetherly Dr, Los Angeles, CA 90069, USA		MATTHEW FRANK	CA Driver's License, Vehicle Registration	Regular	Approved
HSR19-000051	1325 Londonderry Pl, Los Angeles, CA 90069, USA		Emma Hernan	Massachusetts Driver's License, Pay Statement, Vehicle Insurance Bill	Extended	Approved
HSR20-000643	8544 Franklin Ave, Los Angeles, CA 90069, USA		Christopher Zoumalan	CA Driver's License, Pay Statement, Vehicle Insurance Bill	Regular	Approved
HSR19-005445	8284 Hollywood Blvd, Los Angeles, CA 90069, USA		Anna Houssels	CA Driver's License, Vehicle Insurance Bill, Election Mail	Regular	Approved
HSR19-004370	1254 Sunset Plaza Dr, Los Angeles, CA 90069, USA		Shane Reichow		Regular	Approved
HSR19-004316	1900 Sunset Plaza Dr, Los Angeles, CA 90069, USA		Eliana Konsker	Florida Driver's License, Pay Statement, Landlord Affidavit, Rental Agreement	Regular	Approved
HSR20-000428	2189 Sunset Plaza Dr, Los Angeles, CA 90069, USA		VIVIAN ELLIS FRANKLIN	CA Driver's License, Vehicle Registration	Regular	Approved
HSR19-005282	8900 Devlin Pl, Los Angeles, CA 90069, USA		Rosemary Ivsic	CA Driver's License, Voter Registration	Regular	Approved
HSR20-000644	1746 Crisler Way, Los Angeles, CA 90069, USA		Benson Kong	U.S Passport, Vehicle Registration, Voter Registration, Health Insurance Bill	Regular	Approved
HSR19-004885	8715 Sunset Plaza Pl, Los Angeles, CA 90069, USA		Canaan Rubin	CA Driver's License, Vehicle Registration	Regular	Approved
HSR19-004757	1654 Mountcrest Ave, Los Angeles, CA 90069, USA		Samuel Mongiello	CA Driver's License, Voter Registration	Regular	Approved

HSR19-005296	8445 Franklin Ave, Los Angeles, CA 90069, USA		Steven Chao	CA Driver's License, Pay Statement, Health Insurance Bill	Regular	Approved
HSR19-005756	1494 N Kings Rd, Los Angeles, CA 90069, USA		Darren Borg	CA Driver's License, Vehicle Insurance Bill, Vehicle Registration	Regular	Approved
HSR19-004289	9314 Sierra Mar Dr, Los Angeles, CA 90069, USA		Shrikant Tamhane	CA Driver's License, Vehicle Registration, Vehicle Insurance Bill	Regular	Approved
HSR20-000514	1889 Rising Glen Rd, Los Angeles, CA 90069, USA		STEPHEN RESNICK	CA Driver's License, Voter Registration	Regular	Approved
HSR20-000174	1855 Sunset Plaza Dr, Los Angeles, CA 90069, USA		FRED LAURENCE SELDEN	CA Driver's License, Health Insurance Bill	Regular	Approved
HSR19-005785	8971 Shoreham Dr, Los Angeles, CA 90069, USA		Agustin Musa	CA Driver's License, Pay Statement, Landlord Affidavit, Rental Agreement	Regular	Approved
HSR19-002659	1423 Devlin Dr, West Hollywood, CA 90069, USA		Heidi Mckenna	CA Driver's License, Pay Statement	Regular	Approved
HSR19-001602	8474 Romaine St, Los Angeles, CA 90069, USA	202	Maria Dmitrieva	CA Driver's License, Vehicle Insurance Bill, Landlord Affidavit, Rental Agreement	Regular	Approved
HSR19-005419	1410 Miller Dr, Los Angeles, CA 90069, USA		Stephen Cobos	CA Driver's License, Vehicle Registration Card	Regular	Approved
HSR19-003409	1344 Belfast Dr, Los Angeles, CA 90069, USA		SARA JEIHOONI	CA Driver's License, Vehicle Insurance Bill, Landlord Affidavit	Regular	Approved
HSR19-003671	1400 Devlin Dr, Los Angeles, CA 90069, USA		TIMOTHY DEVINE	CA Driver's License, Vehicle Registration	Regular	Approved
HSR19-002856	1862 Rising Glen Rd, Los Angeles, CA 90069, USA		William J. Silva	U.S Passport, Property Tax Bill, Pay Statement	Regular	Approved
HSR19-000975	1352 Miller Dr, Los Angeles, CA 90069, USA		Jonathan Gonen	Nevada Driver's License, Pay Statement, Property Tax Bill	Regular	Approved
HSR19-001735	1470 Sunset Plaza Dr, Los Angeles, CA 90069, USA		Gina Sanchez	CA Driver's License, Property Tax Bill	Regular	Approved
HSR19-001791	1585 Sunset Plaza Dr, Los Angeles, CA 90069, USA		Koan Cho	CA Driver's License, Pay Statement, Health Insurance Bill	Regular	Approved
HSR19-002419	1527 Marmont Ave, Los Angeles, CA 90069, USA		Richard Hutcheson	CA Driver's License, Vehicle Registration, Voter Registration	Regular	Approved
HSR19-003623	1586 Sunset Plaza Dr, Los Angeles, CA 90069, USA		Perez Batashvili	CA Driver's License, Pay Statement, Landlord Affidavit, Rental Agreement	Regular	Approved
HSR19-003832	9140 St Ives Dr, Los Angeles, CA 90069, USA		Stephen Fung	CA Driver's License, Voter Registration	Regular	Approved
HSR19-001320	8824 Hollywood Blvd, Los Angeles, CA 90069, USA		James Darrell K Lindgren	CA Driver's License, Vehicle Insurance Bill, Vehicle Registration	Extended	Approved
HSR19-000068	8950 St Ives Dr, Los Angeles, CA 90069, USA		barbra witzer banner	CA Driver's License, Vehicle Insurance Bill	Extended	Approved
HSR20-002174	8730 Hollywood Blvd, Los Angeles, CA 90069, USA		Michael Draz		Regular	Denied
HSR20-002481	9400 Flircker Way, Los Angeles, CA 90069, USA		David Bogner		Regular	Denied
HSR20-002381	8159 Hollywood Blvd, Los Angeles, CA 90069, USA		Lorenzo Doumani		Regular	Denied
HSR20-002085	8514 Franklin Ave, Los Angeles, CA 90069, USA		ASHLEY NICHOLE CLANTON		Regular	Denied
HSR20-001864	1277 Sunset Plaza Dr, Los Angeles, CA 90069, USA		Heath Wells		Regular	Denied
HSR20-001383	9105 Cordell Dr, Los Angeles, CA 90069, USA		Davana Fryzer		Regular	Denied
HSR20-001803	8545 Franklin Ave, Los Angeles, CA 90069, USA		Louis Hayward		Regular	Denied
HSR20-002203	9221 Sierra Mar Dr, Los Angeles, CA 90069, USA		Karen Longley		Regular	Denied
HSR20-001519	1317 Devlin Dr, Los Angeles, CA 90069, USA		PETER KOMAR		Regular	Denied
HSR20-001412	1516 Forest Knoll Dr, Los Angeles, CA 90069, USA		CODY LEEDER		Regular	Denied
HSR19-004652	1618 Sunset Plaza Dr, Los Angeles, CA 90069, USA		neal morse		Regular	Denied
HSR20-001715	8474 Romaine St, West Hollywood, CA 90069, USA	202	Beegan Land		Regular	Denied
HSR20-001743	1781 N Crescent Heights Blvd, Los Angeles, CA 90069, USA		illana diamant		Regular	Denied
HSR20-001680	8501 Hillside Ave, Los Angeles, CA 90069, USA		Bernard Gainey		Regular	Denied
HSR19-000566	8608 Hollywood Blvd, Los Angeles, CA 90069, USA		Nicholas Condos		Regular	Denied
HSR19-000568	8360 Marmont Ln, Los Angeles, CA 90069, USA		Harrison Condos		Regular	Denied
HSR20-001035	2183 Sunset Plaza Dr, Los Angeles, CA 90069, USA		Brad Keith		Regular	Denied
HSR20-000079	1677 N Crescent Heights Blvd, Los Angeles, CA 90069, USA		PARVEZ NADEEM TYAB		Regular	Denied
HSR20-000660	8469 Franklin Ave, Los Angeles, CA 90069, USA		Ana Franco		Regular	Denied
HSR20-000813	1271 St Ives Pl, Los Angeles, CA 90069, USA		Sara Lane		Regular	Denied
HSR20-001134	960 N Alfred St, Los Angeles, CA 90069, USA	216	JAMES THOMAS CANN		Regular	Denied
HSR20-000463	8516 Franklin Ave, Los Angeles, CA 90069, USA		Stefan Krause		Regular	Denied
HSR19-005366	1551 Oriole Ln, Los Angeles, CA 90069, USA		Patrick Cunningham		Regular	Denied
HSR19-005063	1815 N Crescent Heights Blvd, Los Angeles, CA 90069, USA		Amir Afraz Deris		Regular	Denied
HSR19-005146	8613 Hollywood Blvd, Los Angeles, CA 90069, USA		Abby Brian		Regular	Denied
HSR19-005777	8380 Hollywood Blvd, Los Angeles, CA 90069, USA		Christian Schoyen		Regular	Denied
HSR20-000177	1868 N Doheny Dr, Los Angeles, CA 90069		Daniel Cheli		Regular	Denied
HSR20-000121	8435 Franklin Ave, Los Angeles, CA 90069, USA		Frederick Almeida		Regular	Denied
HSR20-000321	8666 Hollywood Blvd, Los Angeles, CA 90069, USA		ANTHONY SILVA		Regular	Denied
HSR20-000934	1335 Londonderry Pl, Los Angeles, CA 90069, USA		Laura Garratt		Regular	Denied
HSR20-000843	8835 Evanview Dr, Los Angeles, CA 90069, USA		Genesee Eggert		Regular	Denied
HSR19-005887	8494 Carlton Way, Los Angeles, CA 90069, USA		Claudia Sarne		Regular	Denied
HSR19-003628	1488 N Kings Rd, West Hollywood, CA 90069, USA		Miriam Nervo		Regular	Denied
HSR19-003759	8634 Hillside Ave, Los Angeles, CA 90069, USA		Jesse Waits		Regular	Denied
HSR19-004081	1478 N Kings Rd, Los Angeles, CA 90069, USA		Bryan Gaw		Regular	Denied
HSR19-004130	1432 N Kings Rd, Los Angeles, CA 90069, USA		Joshua Kashani		Regular	Denied
HSR20-000472	8646 Hillside Ave, Los Angeles, CA 90069, USA		Tran Tran		Regular	Denied
HSR19-004887	1400 Miller Dr, Los Angeles, CA 90069, USA		David Lemberg		Regular	Denied
HSR19-004357	8980 Shoreham Dr, Los Angeles, CA 90069, USA		Cheryl Maglieri		Regular	Denied
HSR19-003645	1328 Devlin Dr, Los Angeles, CA 90069, USA		Julien Marbot		Regular	Denied
HSR19-004006	1654 Blue Jay Way, Los Angeles, CA 90069, USA		Daniel Taheri		Regular	Denied

HSR19-005034	9221 Sierra Mar Dr, Los Angeles, CA 90069, USA		Karen Longley Gordy	Regular	Denied
HSR19-003910	8474 Romaine St, Los Angeles, CA 90069, USA	203	Beejan Land	Regular	Denied
HSR20-000210	1614 Viewmont Dr, Los Angeles, CA 90069, USA		Francisco Schmidberger	Regular	Denied
HSR19-001445	1606 Viewmont Dr, Los Angeles, CA 90069, USA		Gadson Johnson	Regular	Denied
HSR19-004037	9265 Warbler Way, Los Angeles, CA 90069, USA		NATHAN COYLE	Regular	Denied
HSR19-003189	1456 Sunset Plaza Dr, Los Angeles, CA 90069, USA		caroline chaffin	Regular	Denied
HSR20-000430	1240 Sierra Alta Way, Los Angeles, CA 90069, USA		KAYSAN GHASSEMINEJAD	Regular	Denied
HSR19-002671	8437 Carlton Way, Los Angeles, CA 90069, USA		Michel Amar	Regular	Denied
HSR20-000659	1653 Sunset Plaza Dr, Los Angeles, CA 90069, USA		Nina Hunt	Regular	Denied
HSR19-004926	8827 Evanview Dr, Los Angeles, CA 90069, USA		Kimberly Garrett	Regular	Denied
HSR19-000428	8544 Franklin Ave, Los Angeles, CA 90069, USA		Christopher Zoumalan	Regular	Denied
HSR19-000190	8900 Devlin Pl, Los Angeles, CA 90069, USA		Rosemary Ivsic	Regular	Denied
HSR19-000916	8401 Carlton Way, Los Angeles, CA 90069, USA		Luping Wang	Regular	Denied
HSR19-001236	9386 Sierra Mar Dr, Los Angeles, CA 90069, USA		YETTA LEVITAS	Regular	Denied
HSR19-001321	8824 Hollywood Blvd, Los Angeles, CA 90069, USA		James Darrell K Lindgren	Regular	Denied
HSR19-001492	1746 Crisler Way, Los Angeles, CA 90069, USA		Benson Kong	Regular	Denied
HSR19-001676	1602 Viewmont Dr, Los Angeles, CA 90069, USA		Liam Anton Petrov	Regular	Denied
HSR19-001788	9275 Flicker Way, Los Angeles, CA 90069, USA		Michael McQuarn	Regular	Denied
HSR19-001978	9329 Warbler Way, Los Angeles, CA 90069, USA		Benjamin Bacal	Regular	Denied
HSR19-002909	924 N Alfred St, Los Angeles, CA 90069, USA	108	Rhiannon Genov	Regular	Denied
HSR19-003005	1240 Sierra Alta Way, Los Angeles, CA 90069, USA		KAYSAN GHASSEMINEJAD	Regular	Denied
HSR19-003265	9393 Sierra Mar Dr, Los Angeles, CA 90069, USA		Benjamin Bacal	Regular	Denied
HSR19-003699	9264 Cordell Dr, Los Angeles, CA 90069, USA		Christopher Furie	Regular	Denied
HSR19-003704	1602 Viewmont Dr, Los Angeles, CA 90069, USA		Igor Rocha	Regular	Denied
HSR19-004679	9400 Flicker Way, Los Angeles, CA 90069, USA		David Bogner	Regular	Denied
HSR19-005078	8228 Belligave Pl, Los Angeles, CA 90069, USA		Zhansaya Saparkhanova	Regular	Denied
HSR20-000081	8507 Franklin Ave, Los Angeles, CA 90069, USA		Amikjit reen	Regular	Denied
HSR19-004882	8835 Evanview Dr, Los Angeles, CA 90069, USA		Genesee Eggers	Regular	Inactive
HSR19-004139	1366 Miller Dr, Los Angeles, CA 90069, USA		Lori Leve	Extended	Inactive
HSR19-004139	1366 Miller Dr, Los Angeles, CA 90069, USA		Lori Leve	Regular	Inactive
HSR19-001664	1600 Sunset Plaza Dr, Los Angeles, CA 90069, USA		John Eastman	Regular	Inactive
HSR19-001664	1600 Sunset Plaza Dr, Los Angeles, CA 90069, USA		John Eastman	Regular	Inactive
HSR19-002788	1680 Sunset Plaza Dr, Los Angeles, CA 90069, USA		Levon Hairapetian	Regular	Inactive
HSR19-003028	8641 Metz Pl, Los Angeles, CA 90069, USA		JELENA SPAJIC	Regular	Inactive
HSR20-000238	1615 Marmont Ave, Los Angeles, CA 90069, USA		Tracy Byer	Regular	Inactive
HSR19-001364	1924 Sunset Plaza Dr, Los Angeles, CA 90069, USA		JOSEPHINE MATILDA GONZALEZ	Regular	Inactive
HSR19-003835	1514 1/2 Sunset Plaza Dr, Los Angeles, CA 90069, USA		NONA SUMMERS	Regular	Inactive
HSR20-000475	9238 Kinglet Dr, Los Angeles, CA 90069, USA		Kal Yee	Regular	Inactive
HSR19-001485	9285 Flicker Pl, Los Angeles, CA 90069, USA		KENNETH KATSUMOTO	Regular	Inactive
HSR19-001402	8501 Hillside Ave, Los Angeles, CA 90069, USA		Bernard Gainey	Regular	Inactive
HSR19-000365	8564 Hillside Ave, Los Angeles, CA 90069, USA		ERIC AVERY	Regular	Inactive
HSR19-000365	8564 Hillside Ave, Los Angeles, CA 90069, USA		ERIC AVERY	Regular	Inactive
HSR19-002217	1836 N Doheny Dr, Los Angeles, CA 90069, USA		Matthew Snyder	Regular	Inactive
HSR19-000388	1781 N Crescent Heights Blvd, Los Angeles, CA 90069, USA		Illana Diamant	Extended	Inactive
HSR19-000388	1781 N Crescent Heights Blvd, Los Angeles, CA 90069, USA		Illana Diamant	Regular	Inactive
HSR19-002862	1711 Viewmont Dr, Los Angeles, CA 90069, USA		Navid Tebyani	Regular	Inactive
HSR19-003682	2183 Sunset Plaza Dr, Los Angeles, CA 90069, USA		BRADLEY KEITH	Regular	Inactive
HSR19-000441	1711 Kings Way, Los Angeles, CA 90069, USA		Rami Ettlinger	Regular	Inactive
HSR19-000862	1500 Sunset Plaza Dr, Los Angeles, CA 90069, USA		Suzanne Taylor	Regular	Inactive
HSR19-000862	1500 Sunset Plaza Dr, Los Angeles, CA 90069, USA		Suzanne Taylor	Regular	Inactive
HSR19-003002	1664 Sunset Plaza Dr, Los Angeles, CA 90069, USA		Darren Schaeffer	Regular	Inactive
HSR19-003048	8440 Franklin Ave, Los Angeles, CA 90069, USA		Adel Ibrahim	Regular	Inactive
HSR19-001602	8474 Romaine St, Los Angeles, CA 90069, USA	202	Maria Dmitrieva	Extended	Inactive
HSR19-005445	8284 Hollywood Blvd, Los Angeles, CA 90069, USA		Anna Houssels	Extended	Inactive
HSR19-003116	8614 Hollywood Blvd, Los Angeles, CA 90069, USA		Maximillian Resnik	Regular	Inactive
HSR19-001918	1354 Miller Pl, Los Angeles, CA 90069, USA		Michael Newman	Regular	Inactive
HSR19-000402	1601 Sunset Plaza Dr, Los Angeles, CA 90069, USA		Cary Kazemi	Regular	Inactive
HSR20-001052	9386 Sierra Mar Dr, Los Angeles, CA 90069, USA		YETTA LEVITAS	Regular	Inactive
HSR20-001051	9386 Sierra Mar Dr, Los Angeles, CA 90069, USA		YETTA LEVITAS	Regular	Inactive
HSR20-001050	9386 Sierra Mar Dr, Los Angeles, CA 90069, USA		YETTA LEVITAS	Regular	Inactive
HSR20-001049	9386 Sierra Mar Dr, Los Angeles, CA 90069, USA		YETTA LEVITAS	Regular	Inactive
HSR19-000051	1325 Londonderry Pl, Los Angeles, CA 90069, USA		Emma Hernan	Regular	Inactive

HSR19-004138	8810 Hollywood Blvd, Los Angeles, CA 90069, USA		Savas Sirikci	Regular	Inactive
HSR19-000068	8950 St Ives Dr, Los Angeles, CA 90069, USA		barbra witzer banner	Regular	Inactive
HSR19-000590	732 Huntley Dr, 1 West Hollywood, CA 90069, USA	1	Melissa Bolona	Regular	Inactive
HSR19-001320	8824 Hollywood Blvd, Los Angeles, CA 90069, USA		James Darrell K Lindgren	Regular	Inactive
HSR20-002718	8545 Franklin Ave, Los Angeles, CA 90069, USA		Louis Hayward	Regular	Pending
HSR20-002707	9221 Sierra Mar Dr, Los Angeles, CA 90069, USA		Karen Longley	Regular	Pending
HSR19-004882	8835 Evanview Dr, Los Angeles, CA 90069, USA		Genesee Eggers	Regular	Pending
HSR20-002696	8514 Franklin Ave, Los Angeles, CA 90069, USA		ASHLEY N CLANTON	Regular	Pending
HSR19-002419	1527 Marmont Ave, Los Angeles, CA 90069, USA		Richard Hutcheson	Regular	Pending
HSR19-001791	1585 Sunset Plaza Dr, Los Angeles, CA 90069, USA		Koan Cho	Regular	Pending
HSR20-002650	9265 Warbler Way, Los Angeles, CA 90069, USA		NATHAN COYLE	Regular	Pending
HSR20-002640	1447 N Kings Rd, Los Angeles, CA 90069, USA		Adam Shaul	Regular	Pending
HSR19-002788	1680 Sunset Plaza Dr, Los Angeles, CA 90069, USA		Levon Hairapetian	Regular	Pending
HSR20-002582	8657 Metz Pl, Los Angeles, CA 90069, USA		BENJAMIN AFLALO	Regular	Pending
HSR20-002619	9092 St Ives Dr, Los Angeles, CA 90069, USA		Oliver Mateen	Regular	Pending
HSR20-002405	8411 Hollywood Blvd, Los Angeles, CA 90069, USA		BRIAN EGAN	Regular	Pending
HSR20-002308	1147 N Wetherly Dr, Los Angeles, CA 90069, USA		Vadim Levotman	Regular	Pending
HSR20-002445	1610 Viewmont Dr, Los Angeles, CA 90069, USA		Levon Hairapetian	Regular	Pending
HSR19-004757	1654 Mountcrest Ave, Los Angeles, CA 90069, USA		Samuel Mongiello	Extended	Pending