

Vacation Rentals Ordinance Project

Case Number: ENV-2019-7046-ND

Project Location: Citywide

Community Plan Area: Citywide

Council District: Citywide

Project Description Summary: 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. 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 dwelling unit may be rented as a Vacation Rental in a calendar year. The proposed ordinance establishes a process for Vacation Rental permit application, renewal, suspension and revocation, establishes standards and requirements for both Vacation Rental permittees and hosting platforms, directs a portion 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. Collectively, this is referred to as the City's proposed Vacation Rental Ordinance Project ("Project").

PREPARED BY:

The City of Los Angeles
Department of City Planning

June 2020

INITIAL STUDY

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INITIAL STUDY

1 INTRODUCTION

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.

1.1 PURPOSE OF AN INITIAL STUDY

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

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.

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).

1.2. ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into four sections as follows:

1 INTRODUCTION

Describes the purpose and content of the Initial Study, and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment.

3 PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including project characteristics and a list of discretionary actions.

4 EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

INITIAL STUDY

2 EXECUTIVE SUMMARY

PROJECT TITLE	VACATION RENTALS ORDINANCE
ENVIRONMENTAL CASE NO.	ENV-2019-7046-ND ENV-2019-7375-CE
RELATED CASES	n/a

PROJECT LOCATION	CITYWIDE
COMMUNITY PLAN AREA	CITYWIDE
GENERAL PLAN DESIGNATION	N/A
ZONING	N/A
COUNCIL DISTRICT	CITYWIDE

LEAD AGENCY	City of Los Angeles
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APPLICANT	CITY OF LOS ANGELES
ADDRESS	N/A
PHONE NUMBER	N/A

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, 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; (6) establishing minimum distancing requirements between Vacation Rentals, (7) establishing limits on the number of Vacation Rentals that may be allowed in any individual building, and (8) establishing 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 Vacation Rental permit application, renewal, suspension and revocation, establishes standards and requirements for both Vacation Rental permittees and hosting platforms, directs a portion 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.

The citywide, community plan area, 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 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 anticipated that these multiple measures will limit the 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, collected from a per-night fee levied on Vacation Rental permittees, will be deposited into the Short Term Rental Enforcement Fund to expand enforcement efforts to cover Vacation Rentals. These regulations and enforcement mechanisms will necessarily limit the units available to be used as Vacation Rentals and may discourage individuals who are currently listing dwelling units as Vacation Rentals from continuing to do so. The Project will be applicable to all parcels in which residential uses are permitted or currently exist.

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

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

None.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|---|--|---|
| ☐ Aesthetics | ☐ Greenhouse Gas Emissions | ☐ Public Services |
| ☐ Agriculture & Forestry Resources | ☐ Hazards & Hazardous Materials | ☐ Recreation |
| ☐ Air Quality | ☐ Hydrology / Water Quality | ☐ Transportation |
| ☐ Biological Resources | ☐ Land Use / Planning | ☐ Tribal Cultural Resources |
| ☐ Cultural Resources | ☐ Mineral Resources | ☐ Utilities / Service Systems |
| ☐ Energy | ☐ Noise | ☐ Wildfire |
| ☐ Geology / Soils | ☐ Population / Housing | ☐ Mandatory Findings of Significance |

DETERMINATION

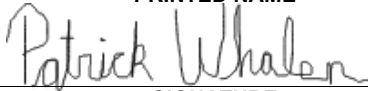
(To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Patrick Whalen

PRINTED NAME



SIGNATURE

City Planning Associate

TITLE

5/29/20

DATE

EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

INITIAL STUDY

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

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. 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 dwelling unit may be rented as a Vacation Rental in a calendar year. The proposed ordinance establishes a process for Vacation Rental permit application, renewal, suspension and revocation, establishes standards and requirements for both Vacation Rental permittees and hosting platforms, directs a portion 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. Collectively, this is referred to as the City's proposed Vacation Rental Ordinance Project ("Project").

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location Citywide

3.2.2 Existing Conditions

For the purposes of CEQA, the analysis of potential environmental impacts from a "project" is based upon a comparison of the potential impacts of a project with the baseline. The baseline is generally the existing physical conditions at the time the City commences the environmental review of the project (CEQA Guidelines, section 15125(a)). This is the case even when the existing conditions are wholly or partially the result of prior illegal activities, including zoning and building code violations (See *Riverwatch v. County of San Diego* (1999) 76 Cal.App.4th 1428, 1452-1453, *Citizens for East Shore Park v. State Lands Commission* (2011) 202 Cal.App.4th 549, 559-560). 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.

While the Home-Sharing Ordinance became effective in July of 2019, enforcement of the ordinance did not begin until November of 2019 in order to provide a transition period for hosts, and to allow the City to establish its enforcement mechanisms and procedures and properly staff the enforcement body charged with implementing the ordinance. Given the recent date of enforcement of this ordinance, data on the number of short-term rentals is incomplete, as the short-term rental market is in transition. However, the City does have data on the number of short-term rentals, including a breakdown on the number that were estimated to be operating as Vacation Rentals, prior to the Home Sharing Ordinance being implemented. Additionally, the City also has evidence of the removal of thousands of units from the rolls of short-term rental platforms in response to hosts either not following the registration requirements or for violating the provisions of the Home Sharing Ordinance. When one evaluates these data points, it is apparent that the Home Sharing Ordinance has already reduced the scope of short-term rental activity in the City, thus rendering pre-HSO enforcement estimates of the level of Vacation Rental activity outdated. This data also speaks to the effectiveness of regulating the short-term rental market in terms of reducing its activity and, consequently, the potential negative side effects that can accompany short-term rental activity, such as impacts to housing availability, nuisance issues such as noise, and possible disruptions to the character of residential neighborhoods.

For purposes of the analysis in this Initial Study, the City is conservatively estimating that the baseline of Vacation Rental activity is low given the implementation and enforcement of the Home Sharing Ordinance. However, based upon reports of a certain number of Vacation Rentals still being listed in contravention of the HSO's restrictions, the City reasonably believes that there are still operators who have found a way to rent units as Vacation Rentals, either through exploiting regulatory loopholes, listing on new or private platforms, or through other means. In order to obtain an estimate of the number of Vacation Rentals currently operating illegally, City Planning, using data obtained from Host Compliance, compared the number of whole home listings across platforms (8,719), with the number of whole home units that are registered through the HSO (3,089) to estimate that there are 5,630 Vacation Rentals currently in operation. However, as enforcement of the HSO continues, and hosting platforms continue to remove unregistered operators, this current estimation would likely fluctuate. Until there is a system in place to permit and regulate Vacation Rentals, the City will not be able to reliably trace the precise amount of Vacation Rental activity occurring, and illegal Vacation Rental activity is likely to continue.

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 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 concentrated in a few neighborhoods in the City.

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 permit only a limited number of Vacation Rentals to operate in the City. In addition, Vacation Rentals permitted by the Project would be subject to regulations and operational standards. Attached to this Initial Study is the draft VRO. The VRO includes the following key provisions:

Definition of Vacation Rental

1. A Vacation Rental is defined as a Dwelling Unit which is not a property owner’s primary residence and is used for Short-Term Rental. (Draft Ord. Section 1, 12.03)

Limitations on Dwelling Units that are Permitted to be Used as Vacation Rentals

1. Only an individual owner of a Dwelling Unit may apply for a permit for a Vacation Rental. Renters or lessees of Dwelling Units may not receive a Vacation Rental Permit (Draft Ord. Section 2: 12.22 A.34(b)(1) & (c)(2).
2. No person or entity may apply for or otherwise operate more than one Vacation Rental at a time. (Draft Ord. Section 2: 12.22 A.34(c)(2)(ii)(c))
3. Only Dwelling Units occupied on an occasional or intermittent basis by the owner are eligible to be used as Vacation Rentals. An owner of a dwelling unit who is applying for a Vacation Rental permit must submit an affidavit, under the penalty of perjury, 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), 12.22 A.34(f)(1).
4. Dwelling Units subject to affordable housing covenants, and/or income-restrictions under City, State, or Federal law, and/or are subject to the City’s Rent Stabilization Ordinance are not eligible to be used as Vacation Rentals. (Draft Ord. Section 2: 12.22 A.34 (c)(ii)(2)(d)&(e).
5. Accessory Dwelling Units are not eligible to be used for Vacation Rentals. (Draft Ord. Section 2: 12.22 A.34 (c)(2)(ii)(f)
6. Vacation Rental permits may not be issued to buildings that have been removed from the rental market through the Ellis Act within seven years of the application submittal date. (Draft Ord. Section 2: 12.22 A.34 (c)(2)(ii)(h)

Caps on Number of Vacation Rentals and Rentals Nights

1. The total number of active Vacation Rental permits at any time in the City is capped at 14,740, which is approximately 1% of the City's total housing stock. (Draft Ord. Section 2: 12.22 A.34 (c)(3)(i))
2. The total number of active Vacation Rental permits at any time is capped at 1% of the total number of housing units within each community plan area. The ordinance contains numerical caps for each community plan area. (Draft Ord. Section 2: 12.22 A.34 (c)(3)(ii))
3. In buildings with four or fewer units (Type 1) only one (1) unit may be permitted as a Vacation Rental. (Draft Ord. Section 2: 12.22 A.34 (b)(2) and (c)(4)(i))
4. Vacation Rentals in buildings with more than four units (Type 2) may have a minimum of one (1) Vacation Rental. In Type 2 buildings, the maximum number of Vacation Rentals shall not exceed 5 percent of the total number of units in the building, or 10 units in total, whichever is less. (Draft Ord. Section 2: 12.22 A.34 (b)(2) and (c)(4)(i))
5. A Vacation Rental may be rented for no more than 90 nights per calendar year. (Draft Ord. Section 2: 12.22 A.34(c)(3)(iii))

Distancing Requirements for Vacation Rentals in Type 1 Buildings

1. A Vacation Rental in a Type 1 building is required to be at least 250 feet away from other Vacation Rentals in Type 1 building on the same block face. (Draft Ord. Section 2: 12.22. A.34(b)(2) and (c)(4)(i)(b))

In addition, the Project includes enforcement tools and resources, including fines for both 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 Vacation Rental unit is rented. The revenue from this fee is required to be deposited into the Short Term Rental Enforcement Fund to enforce the provisions of this ordinance.

3.3.2 Analysis

Vacation Rentals are currently prohibited from operating in the City, and evidence from the early stages of enforcement of the Home-Sharing Ordinance shows a significant reduction in the number of short-term rental listing from estimated pre-enforcement baseline levels. However, based upon information received regarding the continued listing of Vacation Rentals in violation of the HSO, for the purposes of this analysis, the City estimates a relatively small baseline level of Vacation Rental activity occurring illegally but not a baseline of zero Vacation Rental listings. The policy goals of this Project is to allow certain 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 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 as a result of this ordinance. While the Vacation Rental Ordinance could result in incidental development, there is no evidence to indicate that resulting development would be widespread or rise to a significant level. Given the relatively small number of Vacation Rentals that will be permitted to operate within the entire City, caps on the number allowed in each community plan area, the limited number of days a Vacation Rental may be rented each year, 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. An in-depth analysis of the proposed regulations contained in the ordinance follows below.

Vacation Rental Permitting and Permit Eligibility

As described in the above Project Description section of this Initial Study, owners of units intended to be used as Vacation Rentals must obtain a permit from the City in order to operate. The ordinance establishes procedures and requirements for what prospective Vacation Rental permittees must submit in order to apply for a Vacation Rental permit, including documentation that verifies ownership of the unit proposed for Vacation Rental, an affidavit, under the penalty of perjury, verifying the occupancy of the unit by the owner on an occasional or intermittent basis, a list of all hosting platforms intended to be used to list the Vacation Rental, and more. Additionally, the ordinance stipulates that only owners of dwelling units are eligible to obtain a Vacation Rental permit, meaning renters are not permitted to operate Vacation Rental units. These restrictions, in essence, limit the potential housing units that can be used for Vacation Rentals to second homes. Additional limitations on Vacation Rental permitting include allowing Vacation Rental permittees to operate, or hold a valid permit for, only one Vacation Rental at a time, and prohibiting Vacation Rentals from being booked for more than 90 days in a calendar year.

Cumulatively, the eligibility restrictions described above will greatly limit the number of units that can be operated as Vacation Rentals. Specifically, the provision that any entity or individual may only operate one Vacation Rental at a time is intended to prevent large clusters of units in multi-family buildings from being operated as Vacation Rental units, as building owners would only be allowed to obtain one permit for the whole building. Additional restrictions, such as the caps established for Type 2 buildings, help to ensure that clusters of units in condominium buildings also do not become oversaturated with Vacation Rentals. While there is potential for individuals to circumvent the provision that limits each qualifying individual or entity to a maximum of one Vacation Rental permit by creating separate ownership structures for portions of multi-unit buildings, the Project establishes fines that may be levied against hosting platforms and permittees in order to discourage them from attempting to circumvent this restriction on permit eligibility. These fines include a \$1,000 per day fine that can be levied against hosting platforms that complete booking service transactions for listings where more than one Vacation Rental property is affiliated with a single permittee, and a \$500 daily fine that may be levied against Vacation Rental permittees for the same violation. Furthermore, the Project contains additional regulations that reinforce the intent of restricting permit eligibility, which is, ultimately, to limit the number of Vacation Rentals allowed to operate citywide, at the neighborhood level, and at the individual building level. Given these additional restrictions, which will be discussed in detail below, the potential for significant levels of abuse or circumvention of individual provisions of

this Project is negligible due to the redundancy and layered approach the ordinance takes to regulate Vacation Rentals.

Prohibited Types of Housing

In addition to permit eligibility restrictions, the Project contains a series of prohibitions on the types of buildings that may be used for Vacation Rentals. The Project stipulates that units subject to the City's Rent Stabilization Ordinance, a segment of the housing market that represents approximately 45% of the City's total housing stock, as well as those subject to affordable housing covenants, and/or income restrictions pursuant to City, State, or Federal law are not eligible to be used for Vacation Rentals. Accessory Dwelling Units (ADUs) and buildings removed from the rental market via the Ellis Act in the past seven years from the Vacation Rental permit application submittal date are also prohibited to be used for Vacation Rentals. By prohibiting RSO, income restricted, and covenanted housing from being used as Vacation Rentals, the City is protecting some of its most vulnerable residents, ensuring that housing for these populations will continue to be used for long-term housing and not Vacation Rentals, and thus limiting displacement. Due to these restrictions, as well as other provisions of the proposed ordinance, displacement of existing residents is not reasonably anticipated as a result of this Project, and therefore, one cannot reasonably anticipate new construction occurring to house affected residents. Additionally, by prohibiting ADUs and buildings that have been removed from the rental market via the Ellis Act within the past 7 years from being used for Vacation Rentals, the City can reasonably conclude that no new environmental impacts related to the construction of ADUs or the conversion of buildings from rental housing to other uses will occur as a result of this Project.

Concentration Limitations

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 of units produced in just one year.

The citywide cap establishes an 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 14,740 permits is small and, unless the VRO is amended to increase the numerical cap, it will represent an ever smaller percentage of the total housing units in the City as more housing is built over time. While the amount of Vacation Rental units is expected to rise from the low presumed current baseline, the total number that will be allowed is low enough that one can reasonably assume that no significant impacts will arise.

In addition to the citywide cap on the number of active Vacation Rental permits, the Project also contains provisions aimed at preventing an overconcentration of Vacation Rental units in any neighborhood or portion thereof. As previously discussed in the “Existing Conditions” section of this study, 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. To prevent most of the 14,740 permits allowed under the citywide cap from being concentrated in these neighborhoods, or other parts of the City that may become popular tourist destinations in the future, the Project contains numerical caps on the amount of housing units that may be used for Vacation Rentals in every community plan area in the City. Under the proposed ordinance, no more than 1% of the total amount of housing units in any community plan area may be used for Vacation Rentals. Compliance with this provision of the ordinance will be checked at the time of permit application.

Table 1 below shows the total number of dwelling units in each community plan area, and, consequently, the total number of permits that would be allowed in each plan area. By breaking up the citywide cap into these smaller geographies, the Project ensures that no portion of the city is unduly burdened with more Vacation Rentals than another. Without the geographic caps by community plan area, it is likely that Vacation Rental activity would cluster in neighborhoods like Venice, Hollywood, and Silver Lake. While 14,740 permits is a fairly small number when viewed in the context of the entire City, a large percentage of those permits clustering in any particular neighborhood could increase the potential for certain environmental impacts. The geographic caps serve to greatly minimize the potential for this clustering to occur, and further measures are contained in the Project to ensure that clustering does not occur at even more localized levels, such as individual streets, blocks, and buildings.

Table 1: Community Plan Area Vacation Rental Permit Caps		
Community Plan Area	Total Number of Dwelling Units (2018)	Maximum Number of Vacation Rental Permits
Arleta – Pacoima	23,633	236
Bel Air – Beverly Crest	9,039	90
Boyle Heights	24,186	242
Brentwood – Pacific Palisades	27,214	272
Canoga Park – Winnetka – Woodland Hills	69,158	692
Central City	28,798	288
Central City North	8,078	81
Chatsworth – Porter Ranch	36,425	364
Encino – Tarzana	32,332	323
Granada Hills – Knollwood	21,297	213

Harbor – Gateway	13,327	133
Hollywood	107,095	1,071
LAX	589	6
Mission Hills – Panorama City – North Hills	41,232	412
North Hollywood – Valley Village	58,690	587
Northeast Los Angeles	80,500	805
Northridge	24,089	241
Palms – Mar Vista – Del Rey	54,469	544
Port of Los Angeles	32	1
Reseda – West Van Nuys	37,191	372
San Pedro	32,706	327
Sherman Oaks – Studio City – Toluca Lake – Cahuenga Pass	43,380	434
Silver Lake – Echo Park – Elysian Valley	30,623	306
South Los Angeles	86,686	867
Southeast Los Angeles	73,190	732
Sun Valley – La Tuna Canyon	24,577	246
Sunland – Tujunga – Lake View Terrace – Shadow Hills – East La Tuna Canyon	22,387	224
Sylmar	22,294	223
Van Nuys – North Sherman Oaks	62,946	629
Venice	21,139	211
West Adams – Baldwin Hills – Leimert Park	70,754	708
West Los Angeles	38,929	389
Westchester – Playa Del Rey	27,575	276
Westlake	43,530	435
Westwood	21,490	215
Wilmington – Harbor City	23,926	239
Wilshire	130,635	1,306
Total	1,474,141	14,740

Table 1: List of Dwelling Units per Community Plan Area and Number of Vacation Rental Permits Available. Data source: 2018 American Community Survey estimates

The citywide cap and community plan area caps serve to keep Vacation Rental numbers predictably low, and to limit the concentration of Vacation Rental units at the neighborhood level. However, there are also provisions included in the Project that serve to limit the concentration of Vacation Rental units at the individual building and block levels. Acknowledging the differences between large multi-family buildings and smaller, house-scale buildings, the Project creates different distancing requirements and caps for each. For buildings with four or fewer units, including single-family residences, referred to as Type 1 buildings in the ordinance, a maximum of one unit may be used as a Vacation Rental. Additionally, Vacation Rental units in Type 1 buildings must be at least 250 feet away from other Vacation Rental units in Type 1 buildings on the same block face. This provision effectively limits the number of Vacation Rentals that may operate on any particular block, and thus serves to protect the residential character of these low-scale neighborhoods. To illustrate the distancing requirements for Type 1 buildings, a sample diagram has been included below. For the purposes of this example, assume that no conditions are present that would otherwise render properties ineligible from obtaining Vacation Rental permits. If the property identified in blue (Type 1 building) holds a valid Vacation Rental permit, no other Vacation Rentals would be allowed to operate on this block face. Properties on the left side of the image, shown in orange, would be eligible to have a Vacation Rental even if the required 250 feet of separation was not met, because they front a different street, and are not part of the same block face.



For residential buildings containing more than four units, referred to as Type 2 buildings in the ordinance, no more than 5 percent of the total units in the building, or a maximum of 10 units in total, whichever is less, may be used as Vacation Rentals. If the calculation of the number of units that can be used for Vacation Rentals results in a number that is less than one, a Vacation Rental permit may be obtained for one unit in the building. This provision has been included in the Project to limit the number of units in any building from being converted to or built out as Vacation Rentals. It is important to note that only owners of units are permitted to obtain Vacation Rental permits, so these caps on the number of units allowed in Type 2 buildings primarily affect owner occupied (condominium) buildings, and not apartment buildings, which would only have one unit that would be potentially eligible to be used as a Vacation Rental, given the restriction on eligibility to owners of dwelling units.

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

distancing requirements, it is useful to evaluate the effect these provisions could have in real neighborhoods.

Demonstration of Project Provisions

The following portion of this Initial Study will examine a block each in Venice Beach and Hollywood, neighborhoods with some of the highest known concentrations of short-term rental activity in the City, to show how the provisions of this ordinance limit the concentration of Vacation Rentals in neighborhoods exhibiting different densities and built characteristics. For the purposes of this analysis, it is assumed that all housing units are owner occupied, as only owners of dwelling units are eligible to receive Vacation Rental permits. Income restricted properties noted in the below examples are also for demonstrative purposes, in order to show how the provisions of the Project work together to limit the concentration of Vacation Rentals.

Venice Beach

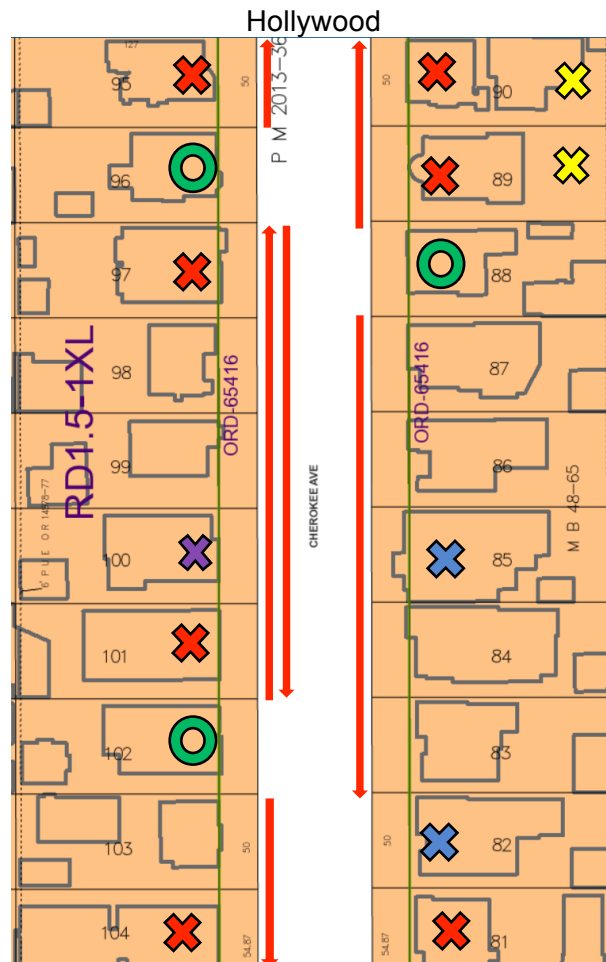


The above image is a block of Ruth Avenue in Venice Beach. Vacation Rentals would not be permitted to locate in lots marked with a red X, because units on these lots are subject to the Rent Stabilization Ordinance (RSO). Lot 225, second from the left in the above image, is a single family residence, 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 O 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 property is outside of the required separation from lot 225, and is not an RSO unit, the VRO prohibits its use as a Vacation Rental.

Lot 216, also developed with a single family residence, is not an RSO unit, has no income restrictions, and is outside of a required buffer from the Vacation Rental on lot 225, so a Vacation Rental would be allowed to operate on this lot. This property has an Accessory Dwelling Unit located in the yard behind the primary residence on the site. While the ADU on the property does not preclude a Vacation Rental from operating in the primary home, the ADU may not be operated as a Vacation Rental, per the provisions of the proposed ordinance. A yellow X has been placed over the ADU on this lot to indicate that it may not operate as a Vacation

Rental. The presence of a Vacation Rental in the primary home on lot 216 requires 250 feet of separation, which renders lots 217-221 to the left of lot 216, and also lots 215 and 214 to the right of it unavailable to house Vacation Rentals. The presence of RSO units in lots 215 and 214, and the required buffer from the Vacation Rental on lot 225 already rendered these lots unavailable to host Vacation Rentals. Similarly, lots 220 and 221 are within the required separation area of two Vacation Rentals- lots 225 and 216. The redundancy of control mechanisms presented in this example highlights multi-layered approach this proposed ordinance takes to limiting the concentration of Vacation Rentals.



The above image is a block of Cherokee Avenue in Hollywood. There is a mix of multi-family and single family residences on this block. Like the example from Venice above, buildings subject to the provisions of the Rent Stabilization Ordinance have been identified with a red X, ADUs have been identified with a yellow X, and properties with income restricted covenants have been identified with a blue X. Vacation Rentals have been prohibited from operating in these types of properties. This example from Hollywood introduces another building type in which Vacation Rentals are prohibited from operating- those that have been taken off the rental market via the Ellis Act in the past seven years, shown on the above image with a purple X. Given the presence of these properties that are prohibited from housing Vacation Rentals, there are limited sites available in this sample block for Vacation Rentals to operate.

If the owner of the single family residence on lot 88 obtains a Vacation Rental permit, the required 250 feet of separation, again shown in red arrows, would render lots 89 and 90 above, and lots 83-87 below, unavailable for Vacation Rentals. Since the separation requirement from Vacation Rentals operating in Type 1 buildings only applies per block face, lots immediately across the street would not be precluded from having Vacation Rentals locate there. For the purposes of this analysis, assume that the owner of the single family residence on lot 96 also obtains a permit for a Vacation Rental. Going down the block, the next available lot on which a Vacation Rental could locate would be lot 102, also developed with a single family residence. Distancing requirements from lot 102 would render the rest of the lots on this block unavailable to Vacation Rentals, leaving just three sites on this block where Vacation Rentals can operate.

In both of the examples analyzed above, the proposed ordinance will limit the concentration of Vacation Rentals by restricting the types of buildings where Vacation Rentals may operate, and by requiring 250 feet of separation between Vacation Rentals operating in Type 1 buildings. In addition to these concentration limitations, a cap has been established on the number of Vacation Rentals that are allowed to operate in Type 2 buildings, or buildings containing more than four units.

In neighborhoods characterized by larger multi-family (Type 2) buildings, building caps limit 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 a condominium building of 100 units, where each unit is occupied by its owner, a maximum of five units (5 percent) would be able to be used as Vacation Rentals due to the Type 2 building cap. If a Type 1 building was to be located immediately adjacent to this Type 2 building, an owner would be able to apply for a permit for a Vacation Rental, as the Type 1 building distancing requirements only affect distancing from other Type 1 buildings. Restrictions on the number of Vacation Rental permits available citywide and in each community plan area, as well as building caps and distancing requirements, combine to significantly restrict the portions of neighborhoods where Vacation Rentals can operate, and thus keep the concentration of Vacation Rental activity low across the City, as well as in individual neighborhoods, blocks, and buildings.

Operational Standards

To address potential nuisance issues that could arise from the presence of Vacation Rentals in residential neighborhoods, the proposed ordinance contains a list of general standards Vacation Rental permittees must enforce. Included in these standards are prohibitions on sound amplifying equipment after 10:00 PM, outdoor congregations of more than eight people, and using the Vacation Rental unit for nonresidential 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

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

Enforcement

While the provisions contained in the proposed ordinance collectively serve to limit the impact that Vacation Rentals will have on the City's housing stock and preserve the residential character of its neighborhoods, enforcement of these provisions will ultimately determine the impact this proposed ordinance will have. The Administrative Citation Enforcement (ACE) program will be used to issue administrative citations and impose fines. Both hosting platforms and Vacation Rental permittees may be fined for participating in activity that violates the provisions of this ordinance, including but not limited to booking unpermitted Vacation Rentals or those that have had their permits suspended or revoked, exceeding the 90 day limit for Vacation Rental operation in one calendar year, and booking listings where more than one Vacation Rental is affiliated with a single permittee. Furthermore, the proposed ordinance provides enhanced funding for enforcement, as it stipulates that Vacation Rental permittees must pay a fee for every night their Vacation Rental is rented, with the funds to be deposited into the Short Term Rental Enforcement Fund. Given the success the City has had with curtailing illegal home-sharing activity after enforcement began, with early data showing as much as a 40% decline in the number of illegal listings, one can reasonably conclude that robust enforcement of the Vacation Rental ordinance will be similarly effective at monitoring issues, encouraging platform compliance, and eliminating permittees who deviate from the standards and regulations contained in the proposed ordinance.

Displacement

The proposed ordinance does not expressly authorize new development, and because of the significant restrictions placed on Vacation Rental activity, Vacation Rentals will occur in existing structures. While it is possible that an individual could construct a new house for the purposes of using it as a Vacation Rental, this is an unlikely scenario due to the high cost of real estate development in Los Angeles and limitations contained in the ordinance that limit the profitability of operating a Vacation Rental, such as the 90 day cap on the number of days a Vacation Rental may be operated in a calendar year. Additionally, the ordinance will not have an adverse impact on the displacement of long-term renters due to provisions in the ordinance that prohibit RSO and covenanted affordable units from being used for Vacation Rentals. Furthermore, by prohibiting Vacation Rentals from operating in buildings that have been taken off of the rental

market via the Ellis Act within the past 7 years, the incentive to evict existing tenants so that the building may be used for Vacation Rentals has been removed. While isolated instances of new construction and displacement may occur as a result of allowing some Vacation Rentals to legally operate in the City, there is no evidence that such instances would be widespread or would rise to any level of significance. The prohibitions and limitations contained in the ordinance help to ensure that the ordinance does not induce new development of Vacation Rental properties or displace existing residents.

Conclusion

The citywide, community plan area, 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 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.

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.

INITIAL STUDY

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099 would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views 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?	☐	☐	☐	☒
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

a) Have a substantial adverse effect on a scenic vista?

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 will not result in changes to a structure's physical shape or size, nor would it create any physical changes to the environment. Therefore, no impact on a scenic vista will result.

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?

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.

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?

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 existing visual character or quality of public views of the site and its surroundings will not be impacted, and would not conflict with any zoning or other regulations governing scenic quality.

d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?

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. It will not introduce new sources of substantial light or glare. No impact related to this issue would occur.

II. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

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. It will not impact or convert any farmland to non-agricultural use, therefore, no impacts related to this issue would occur.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

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. It will not change any land zoned for agricultural use, and the site is not under a Williamson Act Contract. Thus, there is no conflict with existing zoning for agricultural use, or a Williamson Act Contract. Therefore, no impacts related to this issue would occur.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

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. It will not change any land zoned as forest land or timberland. Therefore, no impacts related to this issue would occur.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

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. It does not propose changes to any forest land, therefore, no impacts related to this issue would occur.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

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. No agricultural uses are included as part of the Project, therefore, no impacts related to this issue would occur.

III. AIR QUALITY

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☐	☒
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

a) Conflict with or obstruct implementation of the applicable air quality 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. 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 a change in traffic patterns that would increase or change vehicle emissions from existing conditions. As such, it would not conflict or obstruct implementation of applicable air quality plans.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard?

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. 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.

c) Expose sensitive receptors to substantial pollutant concentrations?

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. For the reasons set forth above, it is not anticipated that the Project will result in an increase in the 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 facilitate the generation or emission of any criteria pollutant from the emissions resulting from existing environmental conditions and would not expose sensitive receptors to pollutants. No related impacts would occur.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

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. As such, activities permitted by the Project would not result in the reasonably foreseeable creation of objectionable odors and therefore, there is no impact.

IV. BIOLOGICAL RESOURCES

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special 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? | ☐ | ☐ | ☐ | ☒ |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service? | ☐ | ☐ | ☐ | ☒ |
| c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | ☐ | ☐ | ☐ | ☒ |
| 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? | ☐ | ☐ | ☐ | ☒ |
| e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | ☐ | ☐ | ☐ | ☒ |
| 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? | ☐ | ☐ | ☐ | ☒ |

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special 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?

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. As such, activities permitted by the proposed ordinance would not result in the reasonably foreseeable impacts to the habitats and species identified in the above question.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural 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?

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. As such, activities permitted by the Project would not result in reasonably foreseeable impacts to habitats or natural communities referenced in the above question.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

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. As such, activities permitted by the proposed ordinance would not result in the reasonably foreseeable impacts to any wetlands.

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?

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. As such, activities permitted by the proposed ordinance would not result in a reasonably foreseeable impact or modification to any wildlife corridors or native wildlife nursery sites.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

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. 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.

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?

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 the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, and no impacts related to this issue would occur.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☐	☒
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☐	☒

a) Cause a substantial adverse change in the significance of a historical resource as pursuant to State CEQA Guidelines §15064.5?

No Impact. State CEQA Guidelines Section 15064.5 defines an historical resource as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in a historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A project-related significant adverse effect would occur if a project would to adversely affect a historical resource meeting one of the above definitions. 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, activities permitted by the proposed ordinance would not result in reasonably foreseeable impacts to historic structures, as they will not be affected by the Project because the ordinance does not specifically authorize development-related activities, nor will it result in reasonably foreseeable new development that could potentially impact historical resources. Thus, the Project would not cause a substantial adverse change in the significance of a historical resource defined in §15064.5. Therefore, no impacts related to historical resources would occur as a result of the ordinance.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

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. No grading or excavation is proposed as part of the Project, nor are such activities reasonably foreseeable consequences of activities authorized by the Project. Therefore, no impacts related to this issue would occur.

c) . Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

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. No grading or excavation is proposed as part of the Project, nor are such activities reasonably foreseeable consequences of activities authorized by the Project. Therefore, no impacts related to this issue would occur.

d) Disturb any human remains, including those interred outside of formal cemeteries?

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. No grading or excavation is proposed as part of the project, nor are such activities a reasonably foreseeable consequence of activities authorized by the Project. Therefore, no impacts related to this issue would occur.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	☒
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

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 the consumption of energy resources compared to existing conditions. Therefore, no related impacts would occur.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

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 it will not conflict or obstruct any plans for renewable energy or energy efficiency. Therefore, no related impacts would occur.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☐	☐	☐	☒
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☐	☒
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

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. As such, the activities permitted by the Project would not cause a reasonably foreseeable rupture of a known earthquake fault nor exacerbate existing environmental conditions so as to potentially cause such rupture.

ii) Strong seismic ground shaking?

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. As such, the activities permitted by the Project would not cause reasonably foreseeable strong seismic ground shaking nor exacerbate existing environmental conditions so as to increase the potential to expose more people to strong seismic ground shaking.

iii) Seismic-related ground failure, including liquefaction?

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. 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.

iv) Landslides?

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. 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.

b) Result in substantial soil erosion or the loss of topsoil?

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. As such, the activities permitted by the Project are not expected to cause reasonably foreseeable physical changes to the environment that would cause soil erosion or loss of topsoil. Therefore, no impacts related to this issue would occur.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

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. As such, the activities permitted by the Project would not cause soil to become unstable resulting in reasonably foreseeable on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse nor exacerbate existing environmental conditions so as to potentially cause these geological events.

d) Be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

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. As such, the activities permitted by the Project would not cause soil to become unstable resulting in reasonably foreseeable exacerbation of the existing expansive soil conditions. Therefore, no related impacts would occur.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

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. As such, the activities permitted by the proposed ordinance would not involve the use of septic tanks or alternative wastewater disposal systems. Thus, the Project would not result in any impacts related to soils that are incapable of adequately supporting the use of septic tanks or alternative

wastewater disposal systems where sewers are not available for the disposal of wastewater. Therefore, no impacts related to this issue would occur.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	☒
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

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. For the reasons set forth above, it is not anticipated the Project will result in an increase in use of residences so as to increase use of energy above existing use levels 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 cause an increase in cumulative greenhouse gas emissions.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

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. For the reasons set forth above, it is not anticipated the Project will result in an increase in use of residences so as to increase use of energy above existing use levels, 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 conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing greenhouse gases.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	☐	☐	☐	☒
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

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, it is not reasonably foreseeable that the activities permitted by the Project would involve routine transport, use, or disposal of hazardous materials. Therefore, no impacts related to this issue would occur.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

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. No excavation or construction-related activities are anticipated to occur which could result in the release of hazardous materials into the environment. Users of short-term rentals are not expected to use hazardous materials other than typical small quantities of household hazardous materials, such as cleaning agents, and these would not be expected to result in impacts over any existing from current uses and baseline conditions. Therefore, no impacts related to this issue would occur.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

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. As discussed above, the Project does not involve the emission or handling of hazardous materials. Therefore, no impacts related to this issue would occur.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

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 activities permitted by the Project would not result in short-term rental uses occurring on sites other than existing residential dwellings. As such, the Project would not increase the number of residences

located on the above described lists from current conditions. As such, it is not reasonably foreseeable that impacts related to this issue would occur.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

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 impacts related to this issue would occur.

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.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☐	☒
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☐	☒
i. Result in substantial erosion or siltation on- or off-site;				
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;				
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				
iv. Impede or redirect flood flows?				
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

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, it would have no impact on water quality standards or waste discharge and would not violate any water quality standards or waste discharge requirements.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

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. Within the City, it is not expected that Vacation Rentals would result in a significant increase in water usage or have an impact on groundwater supplies.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site;

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, it would have no impact on existing drainage patterns.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

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, it would have no impact on runoff water which would exceed the capacity of existing or planned stormwater drainage systems.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

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, it would have no impact on runoff water which would exceed the capacity of existing or planned stormwater drainage systems.

iv. Impede or redirect flood flows?

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 impacts related to this issue would occur

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

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 is no potential to increase risk involved with seiche, tsunami, or mudflow. Therefore, no impacts related to this issue would occur.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management 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. Therefore, no impacts related to the implementation of a water quality control plan or sustainable groundwater management plan would occur.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

a) Physically divide an established community?

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 will be no physical division of an established community, therefore no related impacts would occur.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

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 would be no conflict with any applicable land use plan, policy, or regulation. Therefore, no related impacts would occur.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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?

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 would not 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, therefore, no impacts related to this issue would occur.

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?

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 would not 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. Therefore, no impacts related to this issue would occur.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
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?	☐	☐	☒	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

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.

b) Generation of, excessive groundborne vibration or groundborne noise levels?

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 is no potential for this Project to facilitate the exposure to groundborne vibration or noise. Therefore, no impacts related to this issue would occur.

c) For a project located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

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. 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.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

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 is no potential for inducing population growth, therefore no related impacts would occur.

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. While there is potential for isolated instances of displacement to occur as a result of allowing some Vacation Rentals to operate in the City, such instances would be limited, and there is no evidence to suggest that significant numbers of people would be displaced, thus requiring construction of new housing elsewhere.

XV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☐	☐	☐	☒
b. Police protection?	☐	☐	☐	☒
c. Schools?	☐	☐	☐	☒
d. Parks?	☐	☐	☐	☒
e. Other public facilities?	☐	☐	☐	☒

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.

c) Schools?

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 schools so as to require the construction of new or expanded school facilities, as users of Vacation Residents are overwhelmingly guests to the City, and do not use schools. Therefore, no related impacts would occur.

d) Parks?

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 parks so as to require the construction of new or expanded park facilities. Therefore, no related impacts would occur.

e) Other public facilities?

Libraries

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 libraries so as to require the construction of new or expanded library facilities. Therefore, no related impacts would occur.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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?

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 so as to cause the substantial physical deterioration of such facilities. Therefore, no related impacts would occur.

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?

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, the construction or expansion of recreational facilities would not be required. Therefore, no related impacts would occur.

XVII. TRANSPORTATION/TRAFFIC

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d. Result in inadequate emergency access?	☐	☐	☐	☒

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

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. 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 cause a conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system. Therefore, no related impacts would occur.

b) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

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. 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 conflict with applicable congestion management programs. Therefore, no related impacts would occur.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

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. 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 result in proposed changes for roadway designs or incompatible uses. Therefore, no related impacts would occur.

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.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	☒
b. A resource determined by the lead 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.	☐	☐	☐	☒

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

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.

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead 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?

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.

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 to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed ordinance if the Tribe has submitted a request in writing to be notified of Proposed Ordinances. The Tribe must respond in writing within 30 days of the City's AB52 notice. The Native American Heritage Commission (NAHC) provided a list of Native American groups and individuals who might have knowledge of the religious and/or cultural significance of resources that may be in and near the project site. In accordance with AB 52, notice of the Project was provided on December 2, 2019 to tribes who have requested such notice in the City of Los Angeles, and no tribes requested consultation.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	☒
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☒
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

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 occupancy of Vacation Rentals is anticipated to be the same as long term residential uses of dwelling units. Therefore, use of water, electric, and telecommunication should be similar to usage of dwelling units used for long-term housing. The Project does not propose nor will it require construction of new water, wastewater treatment, storm water drainage facilities, electric power, natural gas, or telecommunication facilities or expansion of existing facilities. Therefore, no related impacts 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 over current conditions. Therefore, no related impacts would occur.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

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 the generation of wastewater. Therefore, no related impacts would occur.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

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 the generation of solid waste over existing conditions. Therefore, no related impacts would occur.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

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. It affects existing residences which complies with all applicable federal, state, and local statutes and regulations related to solid waste generation, and no significant impacts related to this issue would occur.

XX. WILDFIRE

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

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.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

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. Additionally, in

order to help prevent wildfires, the Project requires signs prohibiting outdoor smoking in all Vacation Rentals located in Very High Fire Severity Zones. Therefore, no impacts related to this issue will occur.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

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 ordinance will not result in the need for the installation or maintenance of infrastructure, and therefore, no impacts related to this issue will occur.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

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 therefore will not increase the risk of exposing people or structures to risks of landslides or flooding. Therefore, no related impacts will occur.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒
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)?	☐	☐	☐	☒
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

No Impact. For the reasons stated in this Initial Study, the Project would not have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. No new development is expected to occur for the reasons set forth above.

As discussed in Section V (Cultural Resources), and Section XVIII (Tribal Cultural Resources), the Project would have no impacts to archaeological and paleontological resources and tribal cultural resources. No further analysis is required.

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.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

No Impact. For the reasons stated in this Initial Study, the Project would not potentially cause substantial effects on human beings, either directly or indirectly.

CONCLUSION

Based upon the information set forth above, in the staff report related to this Project and the substantial evidence contained in the whole of the record of proceedings, the City has determined that the adoption of this ordinance could not have a significant effect on the environment and a Negative Declaration may be adopted.