

# Vacation Rentals Ordinance Project

Case Number: ENV-2019-7046-ND

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**Project Location:** Citywide

**Community Plan Area:** Citywide

**Council District:** Citywide

**Project Description Summary:** An ordinance establishing regulations to permit the use of non-primary residences to be used for short-term rentals as Vacation Rental units. 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 permits available citywide and in each census tract, allowing any individual or entity to obtain only one Vacation Rental permit, and allowing only owners of 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 owners of Vacation Rental units 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

December 2019

# 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.

An application for the proposed project has been submitted to the City of Los Angeles Department of City Planning for discretionary review. 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

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

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

<b>LEAD AGENCY</b>	<b>City of Los Angeles</b>
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ADDRESS	200 N. SPRING ST. LOS ANGELES, CA 90012
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<b>APPLICANT</b>	<b>CITY OF LOS ANGELES</b>
ADDRESS	N/A
PHONE NUMBER	N/A

## Executive Summary

The Vacation Rentals Ordinance (Project) is an ordinance that establishes regulations to permit the use of non-primary residences to be used for short-term rentals as Vacation Rental units. The Project includes several limitations on the number of Vacation Rentals that will be permitted to operate in the City, including caps on the number of permits available citywide and in each Census tract, allowing any individual or entity to obtain only one Vacation Rental permit, and allowing only owners of dwelling units to be eligible to obtain a Vacation Rental permit. Additionally, the Project prohibits units subject to the Rent Stabilization Ordinance (RSO), units subject to affordable housing covenants or are otherwise income restricted, Accessory Dwelling Units, and buildings that have been removed from the rental market through the Ellis Act within the past seven years from being used for Vacation Rentals. Furthermore, the Project establishes distancing requirements between Vacation Rentals, limits the number of Vacation Rentals that may be allowed in any individual building, and establishes a maximum number of days that a dwelling unit may be rented as a Vacation Rental in a calendar year. The Project establishes a process for Vacation Rental permit application, renewal, suspension and revocation, establishes standards and requirements for both owners of Vacation Rental units 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, Census tract, and building level caps, as well as the distancing requirements for Type 1 buildings all serve to limit the concentration of Vacation Rental units at the citywide, neighborhood, block, and building levels. When viewed in conjunction with the 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. 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.

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### **OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED**

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

None.

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**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.

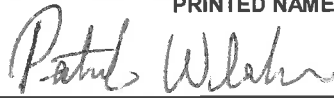
- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Aesthetics                       | <input type="checkbox"/> Greenhouse Gas Emissions      | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation                         |
| <input type="checkbox"/> Air Quality                      | <input type="checkbox"/> Hydrology / Water Quality     | <input type="checkbox"/> Transportation                     |
| <input type="checkbox"/> Biological Resources             | <input type="checkbox"/> Land Use / Planning           | <input type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Cultural Resources               | <input type="checkbox"/> Mineral Resources             | <input type="checkbox"/> Utilities / Service Systems        |
| <input type="checkbox"/> Energy                           | <input type="checkbox"/> Noise                         | <input type="checkbox"/> Wildfire                           |
| <input type="checkbox"/> Geology / Soils                  | <input type="checkbox"/> Population / Housing          | <input type="checkbox"/> 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	City Planning Associate _____ TITLE
 _____ SIGNATURE	12/13/19 _____ 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

An ordinance establishing regulations to permit the use of non-primary residences to be used for short-term rentals as Vacation Rental units. 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 permits available citywide and in each Census tract, allowing any individual or entity to obtain only one Vacation Rental permit, and allowing only owners of dwelling units to be eligible to obtain a Vacation Rental permit. Additionally, the 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 owners of Vacation Rental units 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 Rentals 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 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 the result of prior illegal activities, including zoning and building code violations (See *Riverwatch v. County of San Diego* (1999) 76 Cal.App.4<sup>th</sup> 1428, 1452-1453, *Citizens for East Shore Park v. State Lands Commission* (2011) 202 Cal.App.4<sup>th</sup> 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 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 currently uncertain, as the market is in considerable flux. 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 and owners 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 previous estimates on the baseline level of Vacation Rental activity invalid. 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 disruptions to the character of residential neighborhoods.

While the baseline of Vacation Rental activity must be assumed to be very low given the effectiveness of the Home Sharing Ordinance's enforcement efforts, one must assume 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. Even though the City will develop additional enforcement tools to close these loopholes, until they are closed, this illegal 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 disproportionately 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. The Project includes the following key provisions:

1. Vacation Rental permits may only be issued to owners of Dwelling Units. Renters and lessees are not eligible to obtain a Vacation Rental permit, and only housing units that meet the criteria of a Dwelling Unit are eligible to be operated as a Vacation Rental.
2. 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 annually.
3. Only one Vacation Rental at a time is allowed to be operated by an individual or entity
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
5. Accessory Dwelling Units are not eligible to be used for Vacation Rentals
6. Vacation Rental permits may not be issued to buildings that have been removed from the rental market through the Ellis Act in the past seven years from the application submittal date.
7. The total number of active Vacation Rental permits at any time is capped at 3,625, approximately 0.25 percent of the City's total housing stock
8. The total number of active Vacation Rental permits at any time would be capped at 0.25 percent of the total number of housing units within each Census Tract
9. Vacation Rentals in buildings with four or fewer units (Type 1) are required to be at least 250 feet away from other Vacation Rentals in Type 1 buildings
10. Vacation Rentals in buildings with more than four units (Type 2) may not exceed 5 percent of the total number of units in the building, or 10 units in total, whichever is less
11. Vacation Rental units may not be booked for more than 30 days in a calendar year

In addition, the Project includes enforcement tools and resources, including a requirement for the Owner of a Vacation Rental unit to pay a per-night fee for each night the Vacation Rental unit is rented. The revenue from which is required to be deposited into the Short Term Rental Enforcement Fund to enforce the provisions of this ordinance.

### 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 great effectiveness at reducing the scope of short-term rentals from presumed pre-enforcement baseline levels. However, for the purposes of this analysis, the City assumes that there is still a baseline level of Vacation Rental activity occurring illegally, and while the baseline is small, it is not zero. The intention of this Project is to allow some Vacation Rentals to legally operate, while eliminating those that contribute to issues that are commonly associated with short-term rentals- namely, reducing

available long-term housing supply, changing the residential character of neighborhoods, and nuisance related issues. The proposed ordinance contains several provisions that establish limitations on the amount of and location where Vacation Rentals can operate, operational standards Vacation Rentals must comply with, and associated penalties for both owners of units and hosting platforms for violating the provisions of the ordinance. Cumulatively, these provisions serve to limit the impact Vacation Rentals will have on existing neighborhoods and the environment. While it is expected that the presence of Vacation Rentals will grow beyond the limited presumed current baseline, the overall number of units that will be allowed to be used as Vacation Rentals will not exceed 3,625, which is approximately equal to 0.25% of the City's total current housing stock. Furthermore, the Project does not authorize any new development. Given the relatively small number of Vacation Rentals that will be permitted to operate within the entire City, the caps on the number allowed in each Census tract, and the other limitations and prohibitions contained in the Project, it is reasonably anticipated that no significant environmental impacts will be associated with this Project. An in-depth analysis of the proposed regulations contained in the ordinance follows below.

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 owners 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. Finally, an individual or entity may only operate, or hold a valid permit for, one Vacation Rental at a time, and Vacation Rentals may not be booked for more than 30 days in a calendar year. However, neither the occasional or intermittent owner occupation nor the limitation on the number of nights a Vacation Rental may be operated in a calendar year are being relied upon for the purposes of this environmental analysis.

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. While there is potential for people to find a way around this provision by creating separate ownership structures for portions of buildings, the Project establishes fines that may be levied against hosting platforms and owners 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 owner, and a \$500 daily fine that may be levied against Vacation Rental owners 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.

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

While restrictions on eligibility and prohibitions on the types of housing units that may be used for Vacation Rentals both serve to limit the environmental effects of allowing Vacation Rentals to operate in the City, the most impactful provision of the proposed ordinance for regulating the scope of Vacation Rentals and their concentrations are the caps and distancing requirements contained in the ordinance. The proposed ordinance establishes a citywide cap on the number of active Vacation Rental permits that may exist at any given time. That cap has been set at 3,625 units, which is roughly equal to 0.25% of the City's total housing stock. The citywide cap is an important tool for understanding potential impacts of the ordinance, because it presents a clear figure on the absolute maximum number of units that may be affected by the ordinance. When viewed in the context of the whole City and its approximately 1.45 million housing units, the cap of 3,625 permits is minimal, and its presumed impact is also reasonably expected to be less than significant. While the amount of Vacation Rental units is expected to rise from the extremely low presumed baseline, the total number that will be allowed is low enough that one can reasonably assume that no 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. Neighborhoods such as Venice, Silver Lake, Echo Park, Hollywood, and Downtown show some of the greatest concentrations of short-term rentals in the City. In order to prevent most of the 3,625 permits allowed under the citywide cap from being clustered in these neighborhoods, or other parts of the City that may become popular tourist destinations in the future, the Project contains caps on the percent of housing units that may be used for Vacation Rentals in every Census tract in the City. Under the proposed ordinance, no more than 0.25% of the total amount of housing units in any Census tract may be used for Vacation Rentals. Compliance with this provision of the ordinance will be checked at the time of permit application.

The citywide cap and Census tract 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, 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. 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.

For residential buildings containing more than four units, referred to as Type 2 buildings in the ordinance, no more than 5% 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 Census tract caps significantly restrict the total number and the locations where Vacation Rentals may operate. The effects of the citywide and Census tract caps are fairly evident in that they simply limit the number of Vacation Rentals allowed to operate and their general geographic locations. Distancing requirements and building caps address concentration of Vacation Rentals in a more fine-grained manner. To analyze the impacts of the building caps and distancing requirements, it is useful to evaluate the effect these provisions could have in a neighborhood. By limiting the number of Vacation Rentals that may operate in a Type 1 building to one, and requiring 250 feet of separation between Vacation Rentals in Type 1 buildings, the Project will restrict the number of Vacation Rentals that are allowed to operate in lower density neighborhoods. Given that the typical lot width in the City is 50 feet, the closest a Vacation Rental in a Type 1 building could be to another Vacation Rental in a Type 1 building would be roughly five buildings away. While block sizes in Los Angeles exhibit high degrees of variability, 500 feet can be assumed for the purposes of this example. In this hypothetical neighborhood of Type 1 buildings, a maximum of two Vacation Rentals could operate on one side of the block. Given that distancing requirements are measured radially, portions of the block on the other side of the street would also fall within the required buffer zone from Vacation Rentals, leaving large portions of the other side of the street also ineligible to be used for Vacation Rentals. The total maximum number of Vacation Rentals that could operate on this hypothetical block would be between three and four, assuming all other requirements are met.

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

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 Census tract, 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.

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 owners 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, the ordinance establishes a series of fines that can be levied against both Vacation Rental owners and hosting platforms for violating the provisions of this ordinance, as well as a process for the suspension and revocation of Vacation Rental permits. These regulations and penalties for violating them help to ensure that typical nuisance issues, many of which are already regulated by the Los Angeles Municipal Code, will be kept to a minimum, and that impacts on issues such as noise and traffic will be kept to less than significant levels. Given the early success of enforcement of the Home Sharing Ordinance, one can reasonably assume that enforcement of the Vacation Rentals ordinance will be similarly effective at monitoring issues and eliminating owners who deviate from the standards and regulations contained in the proposed ordinance.

The citywide, Census tract, and building level caps, as well as the distancing requirements for Type 1 buildings all serve to limit the concentration of Vacation Rental units at the citywide, neighborhood, block, and building levels. When viewed in conjunction with the 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
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Except as provided in Public Resources Code Section 21099 would the project:

- |  |                          |                          |                          |                                     |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Have a substantial adverse effect on a scenic vista?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

#### 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |



**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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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. There is the possibility of an increase in operational noise levels in homes that are rented under this ordinance. However, there are no studies or other data that show home-sharing results in a substantial increase in noise levels in neighborhoods with short-term vacation rentals so as to violate a local noise ordinance. Additionally, the Project prohibits the use of sound amplifying equipment and outdoor congregations of more than eight people after 10:00 PM. Furthermore, it is anticipated that enforcement of existing Municipal Code noise regulations, for which funding is provided by the proposed ordinance, will generally ensure excess noise does not result from Vacation Rentals. Thus, the impact of the Project on temporary or permanent ambient noise levels is less than significant.

**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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**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, census tract, 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.

## 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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. 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. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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. It 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### **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. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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.