

# CEQA Compliance – Exemption

## Home-Sharing Ordinance CPC-2016-1243-CA

### PROJECT DESCRIPTION

An ordinance amending Sections 12.03, 12.22, 12.24, 19.01, and 21.7.2 of the Los Angeles Municipal Code (LAMC); and creating a new Section 5.576 of the Administrative Code; imposing regulations to permit sharing of one's primary residence, except units subject to the regulations and restrictions set forth in the Rent Stabilization Ordinance ("RSO"), for no more than 120 days a year, unless registered for Extended Home Sharing; establishing a registration requirement, an application fee for hosts, a fee on nightly stays, and administrative fines for Home-Sharing; and directing a portion of Transient Occupancy Taxes and/or per-night fees derived from Home-Sharing to a new Short-Term Rental Enforcement Trust Fund. This is referred to as the City's proposed "Home Sharing Ordinance."

### CEQA FINDINGS

Pursuant to California Environmental Quality Act (CEQA) Guidelines Sections 15060(c)(2) and 15061(b)(3), the adoption of the proposed Home-Sharing Ordinance is exempt from CEQA. As demonstrated in this document, the proposed ordinance is not a "project" as defined by CEQA Guidelines Section 15378. Additionally, the proposed ordinance is exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3), because it can be seen with certainty that there is no possibility that the project may be a significant effect on the environment.

Impacts of the Home-Sharing Ordinance on the environment will be minor as it is not expected to spur any new development or direct physical effects. The City reasonably expects that implementation of the ordinance will result in fewer primary residences being offered for short-term rentals compared to what currently exists in the City, and better regulation of the activity of sharing certain primary residences for short-term rentals. Both results are unlikely to result in a reasonably foreseeable direct or indirect impact on the environment.

### ANALYSIS

#### Existing Environmental Setting

For the purpose 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.). The following provides a summary of the existing home-sharing activity in the City based upon data and information currently available. It should be noted that though short-term rental activity in the City of Los Angeles is largely prohibited by the City's Zoning Code, the City has been unable to regulate or enforce the City's prohibition of short-term rentals due to limited resources. As demonstrated by the data provided below, this inability to enforce the prohibition has led to considerable growth of the short-term rental industry in Los Angeles.

Short-term rentals have an increasingly larger presence in various neighborhoods of the City, despite their current illegality in all but a few cases (legal Bed and Breakfasts or Transient Occupancy Residential Structures). Based on Citywide data provided by short-term rental services company Host Compliance, LLC, as of October 2017<sup>1</sup> there are approximately 28,918 active short-term rental listings within the City of Los Angeles, which represent approximately 23,151 unique short-term rental units after duplicates and units available for longer-term stays are excluded.<sup>2</sup>

Of these 28,918 active short-term rental listings, approximately 19,953 (69%) are "entire home" listings. However, not all of these homes are actively rented or otherwise empty year-round, and therefore do not necessarily represent a loss in housing stock. Some of these "entire home" listings may be rented out to long-term tenants, or occupied by the homeowner, for the majority of the year. To better understand the potential impact of short-term rental listings on the housing stock, it is helpful to analyze the number of nights that a listing is rented per year. Table 1, on the following page, shows the estimated nights per year that active short-term rental listings are rented.

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<sup>1</sup> Host Compliance, LLC. *Los Angeles: Short-Term Rental Market Overview*. October 2017.

<sup>2</sup> The number of active short-term rental listings (28,918) refers to all online advertisements on a short-term rental hosting platform, regardless of ownership, duplication or type of activity. This may include properties that do not necessarily meet the definition of a short-term rental, such as hotel room listings that are advertised on the platform. The number of unique short-term rental properties (23,151) reflects a more narrowly-tailored estimate, from which listings that do not meet the short-term rental definition have been excluded. This number has been further tailored to remove multiple listings located at a single property.

*Table 1. Estimated Annual Nights Rented Per Year for Short-Term Rental<sup>3</sup>*

<b>Nights Hosted</b>	<b>Number of Listings</b>	<b>% of Listings</b>
<b>0 nights</b>	10,653	36.8%
<b>1 to 30 nights</b>	2,027	7.0%
<b>31 to 90 nights</b>	4,850	16.8%
<b>91 to 120 nights</b>	2,147	7.4%
<b>121 to 180 nights</b>	2,673	9.2%
<b>Over 180 nights</b>	6,588	22.8%
<b>Total Listings</b>	<b>28,938</b>	<b>100.0%</b>

Source: Host Compliance LLC. October 2017. Los Angeles: Short-Term Rental Market Overview

The Host Compliance report estimates there are a total of 11,408 listings in Los Angeles renting for more than 90 days in the last year, with about 6,588 rented for more than 180 days. Units rented for more than 90 days a year as short-term rentals are unlikely to be available as long-term rentals, due to the fact that they would be unavailable for typical year-long leases. Therefore, one way of estimating the number of short-term rental listings that are likely to be unavailable for long-term rentals in Los Angeles is to consider this range of 6,588 to 11,408 units. When factoring in listings that do not meet the definition of a short-term rental, the range of unique housing units used primarily for short-term rentals is estimated to range between approximately 6,000-10,000 housing units.

Compared to the number of total housing units in the City (1.45 million), the range of 6,000-10,000 housing units potentially lost to short-term rentals is a relatively small fraction (less than 1 percent). However, the growth of the practice and its concentration in certain neighborhoods influences housing availability in an increasing number of communities throughout Los Angeles. This is particularly evident in Council Districts 4, 11, 13 and 5, as shown in Table 2, on the following page. The proposed ordinance is intended to limit these effects.

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<sup>3</sup> Note that due to rounding errors and updates to available data, the total number of listings summarized in this table does not precisely equal the number of active short-term rental listings referenced elsewhere in this document. While there is some variation in the data reported, the general ratios are indicative of larger trends.

*Table 2. Estimated Number of Active Short Term Rental Listings by Council District*

<b>Council District</b>	<b>Number of Active Short-Term Rental Listings</b>	<b>Percent of Total</b>
1	1,860	6.4%
2	1,518	5.2%
3	709	2.5%
4	6,012	20.8%
5	3,499	12.1%
6	305	1.1%
7	107	0.4%
8	420	1.5%
9	211	0.7%
10	1,876	6.5%
11	5,842	20.2%
12	334	1.2%
13	4,157	14.4%
14	1,866	6.5%
15	202	0.7%
<b>TOTAL</b>	<b>28,918</b>	<b>100.0%</b>

Source: Host Compliance LLC. October 2017. Los Angeles: Short-Term Rental Market Overview

Host Compliance data from May 2016 and October 2017 show that short-term rental activity had increased by 45 percent over that 16-month period, which translates to a 34 percent annual growth rate when adjusted to a 12-month period.<sup>4</sup> Given the range of 6,000-10,000 longer-term rental units that are potentially lost as a result of short-term rental activity, a 34 percent growth

<sup>4</sup> These past growth rates are not an indicator of future growth under the proposed Home-Sharing Ordinance.

rate indicates an increase of approximately 1,500 to 2,500 longer-term rental units lost in the last year. While not all of these spaces would necessarily be rented out to a long-term tenant otherwise, that could be a viable alternative in many cases. For perspective, the City has lost about 1,300 units subject to the Rent Stabilization Ordinance (RSO) each year from all demolitions and condominium conversions combined since 2001.

### **Proposed Ordinance**

This document provides an analysis of the most current version of the proposed ordinance, which contains additional provisions that the City Council requested DCP draft and include for purposes of further consideration by the City Council. On December 7, 2016 the City Council's Housing Committee conducted a hearing on the then proposed Home-Sharing Ordinance and after conducting the public hearing voted to recommend removal of the provision that would allow the short-term rental of non-primary residences for up to 15 days per year. On April 10, 2018, the City Council's Planning and Land Use Management (PLUM) Committee considered a March 22, 2018 report from the Department of City Planning, at which time the PLUM Committee voted to recommend modifying the proposed Home-Sharing Ordinance to reduce the number of days a primary residence may be used for short-term rental from 180 days to 120 days, and include additional provisions that would create procedures for short-term rentals to exceed the annual cap for future consideration by PLUM and the City Council. These recommendations were approved by the City Council on May 2, 2018, at which time the City Council referred the proposed revisions to the then draft ordinance to the City Planning Commission for further consideration.

The proposed ordinance includes regulations to permit only a subset of the current, existing short-term rentals. In addition, the short-term rentals permitted by this ordinance will be subject to an enhanced regulatory and enforcement environment. As set forth in the staff recommendation report, and modified by City Council as explained above, the ordinance includes the following key provisions:

1. All short-term rentals must be registered with the City (proposed LAMC Section 12.22 A.31(d)).
2. Only primary residences may be shared as short-term rentals (proposed LAMC Section 12.22 A.31(c)(2)).
3. Residences that are subject to the City's Rent Stabilization Ordinance are prohibited as shared short-term rentals (proposed LAMC Section 12.22 A.31(c)(2)).
4. Primary residences may be shared as a short-term rental for no more than 120 days per year, unless additional approval has been granted to exceed the cap and certain conditions have been met (extended home-sharing) (proposed LAMC Section 12.22 A.31(j)).
5. Rental units may only be utilized for home-sharing if the tenant obtains written approval by the landlord (proposed LAMC Section 12.22 A.31(c)(2)). Additionally, landlords may proactively preclude rental units from being used for home-sharing by submitting a written request to the Department of City Planning.

6. Full-time vacation rentals are still prohibited (proposed LAMC Section 12.22 A.31(d)).

The proposed ordinance includes procedures to allow for short-term rentals to exceed the annual cap, called “extended home-sharing.” Administrative approvals for extended home-sharing would require adherence with a set of requirements, would be valid for one year and would require annual renewal. The requirements are set forth in Section 12.22 A.31(j) of the Proposed Ordinance and include a requirement that there are no enforcement actions involving the short-term rental residence or the short-term rental host as the result of any nuisance violation. If properties are not able to meet the criteria for the administrative approval of extended home-sharing, then a discretionary application procedure would be available to participate in extended home-sharing. This discretionary process would require certain findings to be made, as well as CEQA environmental review.

In addition, the ordinance includes additional enforcement tools and resources, including setting aside 10% of the anticipated revenue from the Transient Occupancy Tax, which would be used to enforce the provisions of the ordinance.

## **Analysis**

The proposed ordinance contains numerous provisions the City reasonably believes will lead to lower or decreased rates of short-term rental activity as a result of increased enforcement of new requirements. Currently, short-term rentals are not authorized by existing regulations. As a result of adopting the proposed ordinance, the City will better be able to enforce against illegal short term rentals. Although the proposed ordinance would allow for legal home-sharing uses for the first time in the City, it is expected that the new requirements will reduce home-sharing activity over the level of illegal short-term rental activity that is currently occurring, by providing a better enforcement mechanism.

In addition to increased enforcement ability, the proposed ordinance includes several requirements which are anticipated to reduce the amount of short-term rental activity in the City. This includes the requirements that all short-term rental listings must register with the City in order to be eligible for home-sharing. The ordinance requires that listings contain a registration number in order to easily verify this requirement, and establishes new procedures and revenue to allow for enforcement of the registration requirement. In addition, the ordinance places limits on the types of properties that would be eligible to participate in short-term rentals, including placing an annual cap on short-term rental properties that limits home-sharing to 120 nights per year, unless additional approval is granted to exceed the cap and certain conditions are met. The ordinance would also place a prohibition on home-sharing in housing units that are subject to the Rent Stabilization Ordinance, which applies to nearly forty-five percent of the City’s total housing units (approximately 620,000 units). The requirement that home-sharing be restricted to one’s primary residence will also disqualify a sizable portion of the current short-term rental operators, as further explained below.

While definitive numeric break-downs of the potential effects of the enforcement of specific provisions of the proposed ordinance are not available, the ordinance would have the greatest impact on the more active and intensively used listings, specifically the full-time short-term rental of single family residences as vacation rentals. These properties are currently illegally participating in short-term rentals as a short-term rental use is not legally authorized by the current Code, and would still be barred from legally participating in home-sharing as a result of the adoption and enforcement of the proposed ordinance. Once the ordinance is in place, however, enforcement resources will be more robust.

The ordinance would also have an impact on the number of RSO units that are used for short-term rentals. According to the 2017 Host Compliance report, approximately fifty-five percent of active short-term rental listings in Los Angeles are located in multi-family buildings. Nearly eighty percent of *multi-family units* in Los Angeles are subject to the Rent Stabilization Ordinance (RSO), so it is possible that as many as forty-four percent of current short-term rental units are in RSO units.<sup>5</sup> These units would still be ineligible for home-sharing under the proposed ordinance, but the enforcement resources will be more robust.

The ordinance would additionally impact the number of short-term rentals that are currently in non-primary residences. A May 3, 2017 Budget Memo published by the City Administrative Officer<sup>6</sup> estimated that enforcement of the primary residency requirement could result in up to a 46% decline in short-term rental booking receipts.<sup>7</sup> While booking receipts cannot be directly translated to individual short-term rental units, it can reasonably be concluded that a prohibition on short-term rental activity in non-primary residences could result in up to approximately a 40% reduction in short-term rental activity.

One way to get a better sense of potential effects is to look at the results in a city that has a robust tourism industry and that adopted similar regulations. In May 2015, Santa Monica passed an ordinance that features important similarities to the City's proposed Home-Sharing ordinance. Like in the proposed Home-Sharing ordinance, Santa Monica limits home-sharing to primary residences, requires registration numbers on listings, and places responsibility on both hosts and hosting platforms to enforce the law.<sup>8</sup> Santa Monica does not have any limits on the number of

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<sup>5</sup> If 55% of STR are in multi-family units, and 80% of multi-family units are subject to the RSO, then approximately 44% of STR could be RSO units (55% x 80% = 44%).

<sup>6</sup> City Administrative Officer. *Budget Memo 118: City Planning - Short-Term Rental Transient Occupancy Tax*. May 3, 2017. <http://cao.lacity.org/budgetmemos/FY%202017-18%20All%20CAO%20Budget%20Memos.pdf>

<sup>7</sup> The CAO report estimated a 63.37% total decline in short-term rental booking receipts; however, 20% of that decline (approximately 15% overall) was attributed to the impact of the (then-proposed) annual cap of 180 days. Since then, the annual cap has been reduced to 120 days, and a new process has been proposed to allow for extended home-sharing activity to extend beyond that cap. Since this extended home-sharing process was not anticipated in the CAO report, the Department has not included the full 63.37% decline in this analysis.

<sup>8</sup> There are differences in the ordinances as well. Santa Monica's ordinance requires that short-term stays be "hosted", meaning the host must reside at the property at the time of the stay (not out of town). However Santa Monica staff responsible for the enforcement of that city's home-sharing ordinance report

nights per year that a host can operate a home-share. After Santa Monica began implementing the ordinance in June 2015, total short-term listings in the city are estimated to have dropped from about 1,400 listings to less than 1,000 in the first year (a decline of 30%). Based on discussions with staff in Santa Monica, the reduction of online listings in Santa Monica is due in large part to the staff resources devoted to pro-active enforcement. The City's proposed Home-Sharing ordinance requires that significant resources be dedicated to the enforcement of the ordinance, in particular efforts against illegal listings. This level of resources would allow for a combination of staff resources and third party consultants to enforce the law in the same manner as has been done in Santa Monica.

San Francisco also adopted an ordinance (effective February 2015) that is similar to the proposed Home-Sharing ordinance. Specifically, San Francisco's ordinance limits short-term rentals to primary residences, requires hosts to register as a business, and limits unhosted rentals (which occur when the host is not present in the unit during the guests' stay) to 90 nights per year. The San Francisco Chronicle published a report on February 16, 2018 which showed a 55 percent reduction in short-term rental listings in the City as a result of enforcement of the ordinance.<sup>9</sup> The 55 percent reduction was observed after the City began enforcing registration requirements on January 16, 2018, based on a comparison of the number of active listings on home-sharing platforms Airbnb, HomeAway and FlipKey on August, 29 2017 and January 19, 2018. In particular, the largest reduction in short-term rental listings was observed in neighborhoods that have higher proportions of renters, due in part to the requirement that renters need landlord approval to register for home-sharing. The same requirement would apply under the City's proposed Home-Sharing ordinance, and as such it is anticipated that a similar decline would be observed in Los Angeles.

Based on these available assumptions and the actual results observed in cities with comparable regulations, the City reasonably estimates that the impact of enforcement of the proposed ordinance would reasonably result in approximately a 20% to 40% reduction in short-term rental activity. Based on the data available from Host Compliance, the City would expect that this would lead to a reduction to between approximately 11,000 and 15,000 active listings from the baseline range of 18,285 active listings (those that are rented for one or more nights per year). This estimate is in line with the impacts observed in the City of Santa Monica and the City and County of San Francisco, both of which recently adopted similar regulations. This estimate is based on the assumption that most short-term rental activity that is currently illegal activity would discontinue after adoption of the ordinance; however, it is possible that the reduction may not be as drastic if current short-term rental hosts qualify for home-sharing registration and are thereby able to continue renting out portions of their home on a short-term basis. Nevertheless, the City

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say they are typically unable to enforce this provision because Santa Monica staff have not identified an effective tool to enforce this rule. The proposed Los Angeles ordinance prohibits home-sharing in units subject to the Rent Stabilization Ordinance, which disqualifies nearly half of the City's housing stock from participating in home-sharing.

<sup>9</sup> Carolyn Said, "A Leaner Vacation Market," San Francisco Chronicle, February 16, 2018.  
<https://www.sfchronicle.com/business/article/SF-short-term-rentals-transformed-as-Airbnb-12617798.php>



anticipates a reduction in home-sharing activity as a result of enforcement of the proposed ordinance.

In addition to considering the direct effects of the proposed ordinance on short-term rental activity in the City, staff also considered whether there would be any anticipated indirect impacts on hotel and motel occupancy rates. Specifically, staff considered whether stays in residential short-term rentals may currently lead to reduced demand for typical hotels, motels and bed and breakfasts; and whether a potential impact of the reduction in short-term rental activity in the City may result in increased demand and occupancy rates. The best research the City has located regarding the relationship between hotels and short-term rentals is based on a study of Airbnb stays in Austin, TX<sup>10</sup>. While the study found a significant inverse relationship between hotel revenues and Airbnb stays, it found a near-zero impact on occupancy rates, which is a more relevant metric for assessing potential environmental impacts. Specifically, the study found that a 10% increase in Airbnb listings is associated with a .0005 percent decrease in hotel occupancy rates. This is in line with current information in Los Angeles, where demand for hotel rooms has increased in recent years, despite the ascendance of short-term rentals<sup>11</sup>. Given this assumption, if a 20-40% reduction in short-term activity were to occur as a result of the proposed ordinance, as is reasonably estimated above, changes in hotel occupancy rates would be negligible (an estimated .001-.002 percent increase). This .001 to .002 percent projected increase compares to a decrease in occupancy rate of 1.6% recorded in Los Angeles County through 2017. The impacts of the proposed ordinance on hotel and motel occupancy rates are thereby considered negligible.

In the longer term, short-term rentals may be seen to also affect the hotel industry's investment and development decisions. However, there is no clear evidence of this potential outcome in Los Angeles. During a period of rapid increase in the number of short-term rentals, hotel development has also undergone a significant increase. In January 2016, the Los Angeles Tourism and Convention Board reported that approximately 83 new hotels, with 14,650 guest rooms, were under development. Given current behavior of the hotel industry in constructing a significant number of hotels during a time when the number of short-term rentals have also increased significantly, the proposed ordinance restricting short-term rentals is not likely to influence decisions related to hotel construction. The larger factor is clearly the higher demand for short-term stays overall, as reflected by a record number of visits to the Los Angeles region as well as the record number of hotel room nights sold in 2017 (29.4 million). The increase in hotel development will be sufficient to absorb the largely insignificant increase in hotel occupancy rates associated with the ordinance.

As stated above, there is currently very little effective enforcement against short-term rentals in the City of Los Angeles, the vast majority of which are believed to be operating in violation of current Municipal Code regulations. Therefore, if someone is interested in renting out residential space on an online hosting platform, they are unlikely to wait until a new regulatory system is put in place to engage in such activities. They are already engaging in short-term rental activities.

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<sup>10</sup> Georgios Zervas, Davide Proserpio, and John W. Byers (2017). The Rise of the Sharing Economy: Estimating the Impact of Airbnb on the Hotel Industry. *Journal of Marketing Research*: October 2017, Vol. 54, No. 5, pp. 687-705.

<sup>11</sup> Los Angeles Tourism and Convention Board. Los Angeles Tourism Quick Facts 2017

This conclusion is reinforced by the data provided above that show that as of October 19, 2017 there are approximately 28,918 active short-term rental listings in the City of Los Angeles.

As such, the proposed ordinance would not likely induce any new short-term rentals to take place. On the contrary, as discussed above, it is anticipated that the number of short-term rentals is likely to decline as a result of the proposed ordinance. The City expects many owners of the few thousand homes that would be ineligible for Home-Sharing will discontinue renting their housing units as short-term rentals. Many are likely to end or shorten their activities to fewer than 120 days, leading to a net reduction in short-term rental activity Citywide. This reduction is anticipated to occur, even in light of the City Council recommendations to allow for properties to apply for extended home-sharing beyond the 120-day limit. While it is not known how many hosts would be eligible to apply for extended home-sharing, there are currently approximately 7,500 properties that provide home-sharing for more than 120 days per year. It is important to note, however, that many of these properties would not be eligible for home-sharing or extended home-sharing under the primary residence requirement, prohibition on home-sharing in RSO units, and other requirements. Thus, the net effect of the requirements of the proposed ordinance, along with additional resources for enforcement, are expected to result in a reduction in the number of short-term rentals in the City. For the purposes of CEQA, these reductions are therefore anticipated to result in a reduction in environmental impacts caused by short-term rentals, and as such the proposed Home-Sharing ordinance is not expected to have a significant impact on the environment.

At the more local level, the impact on the residential environment is also likely to be minimal regardless of the exact magnitude of the change in short-term rental activity. With the regulations set forth by the Home-Sharing ordinance, the operation of short-term rental uses would be similar to the operation of a regular occupied home in any residential neighborhood. In fact, oftentimes a bedroom or unit that is used exclusively for a short-term rental is likely to be used less intensely than a full-time, long-term occupied bedroom or unit, and would also be vacant more frequently than a unit or bedroom that is used exclusively as a permanent residence (and as such would have lower operational impacts).

Finally, because only primary residences may be used for short-term rentals, there is no economic incentive to construct new residences for short-term rentals. The City's ordinance should ensure that short-term rental activity will only be an ancillary use to the primary residential use of the residence.

The above analysis concludes that short-term rental activity is likely to decline as a result of the ordinance for the following reasons: (1) the ordinance as proposed permits only residential units used as primary residences to be used as short-term rentals; (2) the ordinance prohibits residential units subject to the City's Rent Stabilization Ordinance stabilization ordinance from use as short-term rentals; (3) the ordinance permits an individual or entity to list only one unit or single family residence as a short-term rental; (4) the ordinance limits home-sharing to an annual cap of 120-days, unless additional approval is granted to exceed the cap and certain additional conditions are met; (5) the ordinance requires that all short-term rentals be registered with the

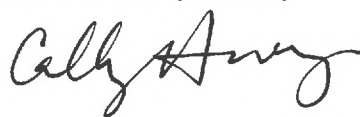
City; (6) the ordinance requires renters who seek to rent their units as short term rentals to obtain permission from their landlords; and (7) the ordinance mandates that ten percent (10%) of the TOT revenue generated from home-sharing rentals be allocated for administration and enforcement of the ordinance's regulations and prohibitions. These regulations will necessarily limit the units available to be used as short-term rentals and may discourage individuals that are currently listing units or residences as short-term rentals from continuing to do so because of the registration requirement and the additional regulations and enforcement. Reductions in the number of short-term rentals should be more pronounced in areas with greater concentrations of entire residences that are listed as short-term rentals. The proposed ordinance amends Sections 12.03, 12.22, 12.24, 19.01 and 21.7.2 of the Los Angeles Municipal Code (LAMC) and will be applicable to all parcels in which residential uses are permitted or currently exist.

## **CONCLUSION**

Pursuant to California Environmental Quality Act (CEQA) Guidelines Sections 15060(c)(2) and 15061(b)(3), the adoption of the proposed Home-Sharing Ordinance is exempt from CEQA. As demonstrated in this document, the proposed ordinance is not a "project" as defined by CEQA Guidelines Section 15378. Additionally, the proposed ordinance is exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3), because it can be seen with certainty that there is no possibility that the project may be a significant effect on the environment.

On the basis of the whole of the record before the lead agency including any comments received, the lead agency finds that there is no substantial evidence that the proposed project will have a significant effect on the environment. The analysis reflects the lead agency's independent judgment and analysis. The records upon which this decision is based are with the Planning Department in Room 278, 200 North Spring Street in Los Angeles, California.

**CITY OF LOS ANGELES**  
 OFFICE OF THE CITY CLERK  
 ROOM 395, CITY HALL  
 LOS ANGELES, CALIFORNIA 90012  
 CALIFORNIA ENVIRONMENTAL QUALITY ACT  
 PROPOSED NEGATIVE DECLARATION

<b>LEAD CITY AGENCY:</b> City of Los Angeles		<b>COUNCIL DISTRICT:</b> CD 1 – CD 15	
<b>PROJECT TITLE:</b> Home-Sharing Ordinance		<b>ENVIRONMENTAL CASE NO:</b> ENV-2016-1277-ND	
<b>PROJECT LOCATION:</b> Citywide			
<b>PROJECT DESCRIPTION:</b> <p>An ordinance amending Sections 12.03, 12.22, 12.24, 19.01, and 21.7.2 of the Los Angeles Municipal Code (LAMC); and creating a new Section 5.576 of the Administrative Code; imposing regulations to permit sharing of one's primary residence, except units subject to the regulations and restrictions set forth in the Rent Stabilization Ordinance ("RSO"), for no more than 120 days a year, unless registered for Extended Home Sharing; establishing a registration requirement, an application fee for hosts, a fee on nightly stays, and administrative fines for Home-Sharing; and directing a portion of Transient Occupancy Taxes and/or per-night fees derived from Home-Sharing to a new Short-Term Rental Enforcement Trust Fund. This is referred to as the City's proposed "Home Sharing Ordinance."</p>			
<b>FINDING:</b> The Department of City Planning of the City of Los Angeles finds that the proposed Project WILL NOT have a significant effect on the environment, an ENVIRONMENTAL IMPACT REPORT is NOT required. The INITIAL STUDY/NEGATIVE DECLARATION prepared for this project is attached.			
<b>NAME OF PERSON PREPARING FORM:</b> Los Angeles Department of City Planning		<b>PLANNER NAME AND TITLE:</b> Cally Hardy, Planning Assistant	<b>TELEPHONE NUMBER:</b> 213-978-1643
<b>ADDRESS</b> 200 N. Spring Street, Room 750 Los Angeles, CA 90012		<b>SIGNATURE (Official)</b> 	<b>DATE:</b> 8/24/2018

<b>CITY OF LOS ANGELES</b> OFFICE OF THE CITY CLERK ROOM 395, CITY HALL LOS ANGELES, CALIFORNIA 90012 CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY AND CHECKLIST (Article IV B City CEQA Guidelines)			
<b>LEAD CITY AGENCY:</b> City of Los Angeles		<b>COUNCIL DISTRICT:</b> CD 1 – CD 15	
<b>DATE:</b> August 24, 2018			
<b>RESPONSIBLE AGENCY:</b> Department of City Planning			
<b>ENVIRONMENTAL CASE:</b> ENV-2017-3410-ND			
<b>PROJECT DESCRIPTION:</b> <p>An ordinance amending Sections 12.03, 12.22, 12.24, 19.01, and 21.7.2 of the Los Angeles Municipal Code (LAMC); and creating a new Section 5.576 of the Administrative Code; imposing regulations to permit sharing of one’s primary residence, except units subject to the regulations and restrictions set forth in the Rent Stabilization Ordinance (“RSO”), for no more than 120 days a year, unless registered for Extended Home Sharing; establishing a registration requirement, an application fee for hosts, a fee on nightly stays, and administrative fines for Home-Sharing; and directing a portion of Transient Occupancy Taxes and/or per-night fees derived from Home-Sharing to a new Short-Term Rental Enforcement Trust Fund. This is referred to as the City’s proposed “Home Sharing Ordinance.”</p>			
<b>ENVIRONMENTAL SETTING:</b> Citywide zoning ordinance.			
<b>PROJECT LOCATION:</b> The City of Los Angeles			
<b>COMMUNITY PLAN AREA:</b> All <b>STATUS:</b> <input type="checkbox"/> Preliminary <input type="checkbox"/> Proposed <input checked="" type="checkbox"/> <b>ADOPTED,</b>		<input checked="" type="checkbox"/> Does Conform to Plan <input type="checkbox"/> Does NOT Conform to Plan	<b>AREA PLANNING COMMISSION:</b> All <b>CERTIFIED NEIGHBORHOOD COUNCIL:</b> All
<b>EXISTING ZONING:</b> Generally multi-family residential zones and commercial zones.		<b>LA River Adjacent:</b> Yes	
<b>GENERAL PLAN LAND USE:</b> Various			

**Determination (To be completed by 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.

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Signature

Planning Assistant  
Title

213-978-1643  
Phone

## INITIAL STUDY CHECKLIST

### 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 significant.

**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"/> AGRICULTURE AND FOREST RESOURCES <input type="checkbox"/> AIR QUALITY <input type="checkbox"/> BIOLOGICAL RESOURCES <input type="checkbox"/> CULTURAL RESOURCES <input type="checkbox"/> ENERGY <input type="checkbox"/> GEOLOGY AND SOILS	<input type="checkbox"/> GREENHOUSE GAS EMISSIONS <input type="checkbox"/> HAZARDS AND HAZARDOUS MATERIALS <input type="checkbox"/> HYDROLOGY AND WATER QUALITY <input type="checkbox"/> LAND USE AND PLANNING <input type="checkbox"/> MINERAL RESOURCES <input type="checkbox"/> NOISE	<input type="checkbox"/> POPULATION AND HOUSING <input type="checkbox"/> PUBLIC SERVICES <input type="checkbox"/> RECREATION <input type="checkbox"/> TRANSPORTATION AND TRAFFIC <input type="checkbox"/> TRIBAL CULTURAL RESOURCES <input type="checkbox"/> UTILITIES <input type="checkbox"/> MANDATORY FINDINGS OF SIGNIFICANCE
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<b>INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)</b>	
<b>PROPONENT NAME:</b> City of Los Angeles Department of City Planning	<b>PHONE NUMBER:</b> 213-978-1643
<b>PROPONENT ADDRESS:</b> 200 N. Spring St., Room 750 Los Angeles, CA 90012	
<b>AGENCY REQUIRING CHECKLIST:</b> City of Los Angeles Department of City Planning	<b>DATE:</b> August 24, 2018
<b>PROPOSAL NAME (If Applicable):</b> Home-Sharing Ordinance	



WOULD THE PROJECT:		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>I. AESTHETICS</b>					
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, OR OTHER LOCALLY RECOGNIZED DESIRABLE AESTHETIC NATURAL FEATURE WITHIN A CITY-DESIGNATED SCENIC HIGHWAY?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	SUBSTANTIALLY DEGRADE THE EXISTING VISUAL CHARACTER OR QUALITY OF THE SITE AND ITS SURROUNDINGS?	<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"/>
<b>II. AGRICULTURE AND FOREST RESOURCES</b>					
a.	CONVERT PRIME FARMLAND, UNIQUE FARMLAND, OR FARMLAND OF STATEWIDE IMPORTANCE, 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 1220(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"/>
<b>III. AIR QUALITY</b>					
a.	CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE SCAQMD OR CONGESTION MANAGEMENT PLAN?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	VIOLATE ANY AIR QUALITY STANDARD OR CONTRIBUTE SUBSTANTIALLY TO AN EXISTING OR PROJECTED AIR QUALITY VIOLATION?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE AIR BASIN IS NON-ATTAINMENT (OZONE, CARBON MONOXIDE, & PM 10) UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	CREATE OBJECTIONABLE ODORS AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

WOULD THE PROJECT:		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IV. BIOLOGICAL RESOURCES</b>					
a.	HAVE A SUBSTANTIAL ADVERSE EFFECT, EITHER DIRECTLY OR THROUGH HABITAT MODIFICATION, ON ANY SPECIES IDENTIFIED AS A CANDIDATE, SENSITIVE, OR SPECIAL STATUS SPECIES IN LOCAL OR REGIONAL PLANS, POLICIES, OR REGULATIONS BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME 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 THE CITY OR REGIONAL PLANS, POLICIES, REGULATIONS BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME OR U.S. FISH AND WILDLIFE SERVICE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON FEDERALLY PROTECTED WETLANDS AS DEFINED BY SECTION 404 OF THE CLEAN WATER ACT (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 TREE PRESERVATION POLICY OR ORDINANCE (E.G., OAK TREES OR CALIFORNIA WALNUT WOODLANDS)?	<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"/>
<b>V. CULTURAL RESOURCES</b>					
a.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF A HISTORICAL RESOURCE AS DEFINED IN STATE CEQA SECTION 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE PURSUANT TO STATE CEQA SECTION 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	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"/>
d.	DISTURB ANY HUMAN REMAINS, INCLUDING THOSE INTERRED OUTSIDE OF FORMAL CEMETERIES?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>VI. GEOLOGY AND SOILS</b>					
a.	EXPOSURE OF PEOPLE OR STRUCTURES TO 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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

WOULD THE PROJECT:		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	OR BASED ON OTHER SUBSTANTIAL EVIDENCE OF A KNOWN FAULT? REFER TO DIVISION OF MINES AND GEOLOGY SPECIAL PUBLICATION 42.				
ii.	STRONG SEISMIC GROUND SHAKING?	<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 OR SOIL THAT IS UNSTABLE, OR THAT WOULD BECOME UNSTABLE AS A RESULT OF THE PROJECT, AND POTENTIAL 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 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"/>
<b>VII. GREENHOUSE GAS EMISSIONS</b>					
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"/>
<b>VIII. HAZARDS AND HAZARDOUS MATERIALS</b>					
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 IT 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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

WOULD THE PROJECT:		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	THE PROJECT RESULT IN A SAFETY HAZARD FOR PEOPLE RESIDING OR WORKING IN THE PROJECT AREA?				
f.	FOR A PROJECT WITHIN THE VICINITY OF A PRIVATE AIRSTRIP, WOULD THE PROJECT RESULT IN A SAFETY HAZARD FOR THE PEOPLE RESIDING OR WORKING IN THE AREA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g.	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"/>
h.	EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INJURY OR DEATH INVOLVING WILDLAND FIRES, INCLUDING WHERE WILDLANDS ARE ADJACENT TO URBANIZED AREAS OR WHERE RESIDENCES ARE INTERMIXED WITH WILDLANDS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>IX. HYDROLOGY AND WATER QUALITY</b>					
a.	VIOLATE ANY WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	SUBSTANTIALLY DEplete GROUNDWATER SUPPLIES OR INTERFERE WITH GROUNDWATER RECHARGE SUCH THAT THERE WOULD BE A NET DEFICIT IN AQUIFER VOLUME OR A LOWERING OF THE LOCAL GROUNDWATER TABLE LEVEL (E.G., THE PRODUCTION RATE OF PRE-EXISTING NEARBY WELLS WOULD DROP TO A LEVEL WHICH WOULD NOT SUPPORT EXISTING LAND USES OR PLANNED LAND USES FOR WHICH PERMITS HAVE BEEN GRANTED)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, IN A MANNER WHICH WOULD RESULT IN SUBSTANTIAL EROSION OR SILTATION ON- OR OFF-SITE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, OR SUBSTANTIALLY INCREASE THE RATE OR AMOUNT OF SURFACE RUNOFF IN AN MANNER WHICH WOULD RESULT IN FLOODING ON- OR OFF SITE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f.	OTHERWISE SUBSTANTIALLY DEGRADE WATER QUALITY?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g.	PLACE HOUSING WITHIN A 100-YEAR FLOOD PLAIN AS MAPPED ON FEDERAL FLOOD HAZARD BOUNDARY OR FLOOD INSURANCE RATE MAP OR OTHER FLOOD HAZARD DELINEATION MAP?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h.	PLACE WITHIN A 100-YEAR FLOOD PLAIN STRUCTURES WHICH WOULD IMPEDE OR REDIRECT FLOOD FLOWS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i.	EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INQUIRY OR DEATH INVOLVING FLOODING, INCLUDING FLOODING AS A RESULT OF THE FAILURE OF A LEVEE OR DAM?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j.	INUNDATION BY SEICHE, TSUNAMI, OR MUDFLOW?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

WOULD THE PROJECT:		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XI. LAND USE AND PLANNING</b>					
a.	PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	CONFLICT WITH APPLICABLE LAND USE PLAN, POLICY OR REGULATION OF AN AGENCY WITH JURISDICTION OVER THE PROJECT (INCLUDING BUT NOT LIMITED TO THE GENERAL PLAN, SPECIFIC PLAN, COASTAL PROGRAM, OR ZONING ORDINANCE) ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL EFFECT?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	CONFLICT WITH ANY APPLICABLE HABITAT CONSERVATION PLAN OR NATURAL COMMUNITY CONSERVATION PLAN?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>XI. MINERAL RESOURCES</b>					
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"/>
<b>XII. NOISE</b>					
a.	EXPOSURE OF PERSONS TO OR GENERATION OF NOISE IN LEVEL 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.	EXPOSURE OF PEOPLE TO OR GENERATION OF EXCESSIVE GROUNDBORNE VIBRATION OR GROUNDBORNE NOISE LEVELS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	A SUBSTANTIAL PERMANENT INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d.	A SUBSTANTIAL TEMPORARY OR PERIODIC INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 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"/>
f.	FOR A PROJECT WITHIN THE VICINITY OF A PRIVATE AIRSTRIP, 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"/>
<b>XIII. POPULATION AND HOUSING</b>					
a.	INDUCE SUBSTANTIAL 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 HOUSING NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

WOULD THE PROJECT:		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c.	DISPLACE SUBSTANTIAL NUMBERS OF PEOPLE NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>XIV. PUBLIC SERVICES</b>					
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"/>
<b>XV. RECREATION</b>					
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"/>
<b>XVI. TRANSPORTATION/CIRCULATION</b>					
a.	CONFLICT WITH AN APPLICABLE PLAN, ORDINANCE OR POLICY ESTABLISHING MEASURES OF EFFECTIVENESS FOR THE PERFORMANCE OF THE CIRCULATION SYSTEM, TAKING INTO ACCOUNT ALL MODES OF TRANSPORTATION INCLUDING MASS TRANSIT AND NON-MOTORIZED TRAVEL AND RELEVANT COMPONENTS OF THE CIRCULATION SYSTEM, INCLUDING BUT NOT LIMITED TO INTERSECTIONS, STREETS, HIGHWAYS AND FREEWAYS, PEDESTRIAN AND BICYCLE PATHS AND MASS TRANSIT?	<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.	RESULT IN A CHANGE IN AIR TRAFFIC PATTERNS, INCLUDING EITHER AN INCREASE IN TRAFFIC LEVELS OR A CHANGE IN LOCATION THAT RESULTS IN SUBSTANTIAL SAFETY RISKS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	SUBSTANTIALLY INCREASE HAZARDS TO A 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"/>
e.	RESULT IN INADEQUATE EMERGENCY ACCESS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f.	CONFLICT WITH ADOPTED POLICIES, PLANS OR PROGRAMS REGARDING PUBLIC TRANSIT, BICYCLE, OR PEDESTRIAN FACILITIES, OR OTHERWISE DECREASE THE PERFORMANCE OR SAFETY OF SUCH FACILITIES?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>XVII. TRIBAL CULTURAL RESOURCES</b>					

WOULD THE PROJECT:		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	BE LISTED OR ELIGIBLE FOR LISTING IN THE CALIFORNIA REGISTER OF HISTORICAL RESOURCES, OR IN A LOCAL REGISTER OF HISTORICAL RESOURCES AS DEFINED IN PUBLIC RESOURCE CODE SECTION 5020.1(K)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	BE 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 RESOURCES 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"/>
<b>XVIII. UTILITIES</b>					
a.	EXCEED WASTEWATER TREATMENT REQUIREMENTS OF THE APPLICABLE REGIONAL WATER QUALITY CONTROL BOARD?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	REQUIRE OR RESULT IN THE CONSTRUCTION OF NEW WATER OR WASTEWATER TREATMENT FACILITIES OR EXPANSION OF EXISTING FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	REQUIRE OR RESULT IN THE CONSTRUCTION OF NEW STORMWATER DRAINAGE FACILITIES OR EXPANSION OF EXISTING FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	HAVE SUFFICIENT WATER SUPPLIES AVAILABLE TO SERVE THE PROJECT FROM EXISTING ENTITLEMENTS AND RESOURCE, OR ARE NEW OR EXPANDED ENTITLEMENTS NEEDED?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	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"/>
f.	BE SERVED BY A LANDFILL WITH SUFFICIENT PERMITTED CAPACITY TO ACCOMMODATE THE PROJECT'S SOLID WASTE DISPOSAL NEEDS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g.	COMPLY WITH FEDERAL, STATE, AND LOCAL STATUTES AND REGULATIONS RELATED TO SOLID WASTE?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>XIX. MANDATORY FINDINGS OF SIGNIFICANCE</b>					
a.	DOES THE PROJECT 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	DOES THE PROJECT HAVE IMPACTS WHICH ARE INDIVIDUALLY LIMITED, BUT CUMULATIVELY CONSIDERABLE? ("CUMULATIVELY CONSIDERABLE" MEANS THAT THE INCREMENTAL EFFECTS OF AN INDIVIDUAL PROJECT ARE CONSIDERABLE WHEN VIEWED IN	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

WOULD THE PROJECT:		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
	CONNECTION WITH THE EFFECTS OF PAST PROJECTS, THE EFFECTS OF OTHER CURRENT PROJECTS, AND THE EFFECTS OF PROBABLE FUTURE PROJECTS).				
c.	DOES THE PROJECT HAVE ENVIRONMENTAL EFFECTS WHICH CAUSE SUBSTANTIAL ADVERSE EFFECTS ON HUMAN BEINGS, EITHER DIRECTLY OR INDIRECTLY?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**DISCUSSION OF THE ENVIRONMENTAL EVALUATION**

The Environmental Impact Assessment includes the use of City of Los Angeles and other government source reference materials related to various environmental impact categories (e.g., Hydrology, Air Quality, Biology, Cultural Resources, Geology, etc.). Impact evaluations are based on stated facts contained therein, including but not limited to, reference materials indicated above, field investigations, and other reliable reference materials known at the time.

Project specific impacts were evaluated based on all relevant facts indicated in the City’s Proposed Ordinance and supportive materials. Both the Initial Study Checklist and Checklist Explanations, in conjunction with CEQA and CEQA Guidelines, were used to reach reasonable conclusions on environmental impacts.

The proposed Project as identified in the Project Description, with required mitigation imposed, will not cause potentially significant impacts on the environment. Therefore, this environmental analysis concludes that an Environmental Impact Report is not necessary.

ADDITIONAL INFORMATION:

All supporting documents and references are contained in the Environmental Case File referenced above and may be viewed in the Department of City Planning, City Hall, 200 N Spring Street, Room 750.

For City information, addresses, and phone numbers: visit the Environmental Review Unit, Room 750, City Hall, 200 N Spring Street, or the City’s websites at: <http://www.lacity.org>; and City Planning and Zoning Information Mapping Automated System (ZIMAS) at <http://www.cityplanning.lacity.org/>.

Engineering/Infrastructure/Topographic Maps/Parcel Information is available at <http://boemaps.eng.ci.la.ca.us/index0.1htm> or City’s main website under the heading “Navigate LA.”

<b>PLANNER NAME:</b> Cally Hardy	<b>TITLE:</b> Planning Assistant	<b>TELEPHONE NO:</b> 213-978-1643	<b>DATE:</b> August 24, 2018
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# **ENVIRONMENTAL IMPACT ANALYSIS**

## **Case No. ENV-2016-1277-ND**

### **Project Description**

An ordinance amending Sections 12.03, 12.22, 12.24, 19.01, and 21.7.2 of the Los Angeles Municipal Code (LAMC); and creating a new Section 5.576 of the Administrative Code; imposing regulations to permit sharing of one's primary residence, except units subject to the regulations and restrictions set forth in the Rent Stabilization Ordinance ("RSO"), for no more than 120 days a year, unless registered for Extended Home Sharing; establishing a registration requirement, an application fee for hosts, a fee on nightly stays, and administrative fines for Home-Sharing; and directing a portion of Transient Occupancy Taxes and/or per-night fees derived from Home-Sharing to a new Short-Term Rental Enforcement Trust Fund. This is referred to as the City's proposed "Home Sharing Ordinance."

### **Executive Summary**

The City has determined the proposed ordinance qualifies under the "common sense" CEQA exemption pursuant to CEQA Guidelines Section 15061(b)(3) and 15060(c)(2), which provides that, where it can be seen with certainty that there is no possibility that a project may have a significant effect on the environment, the project is not subject to CEQA. The substantial evidence supporting that determination is contained in a separate CEQA Narrative included in Exhibit B.1 of the staff recommendation report dated September 2018. Despite that determination, out of an abundance of caution, the City has also prepared this Initial Study that has resulted in the determination the Home-Sharing Ordinance will not have a significant impact on the environment. This Initial Study provides the substantial evidence to support the adoption of a Negative Declaration.

As set forth in this Initial Study, the direct impacts of the ordinance on the environment will be minor as it is not expected to spur any new development, cause direct physical impacts or reasonably foreseeable indirect environmental impacts. The City reasonably anticipates that implementation of the ordinance will result in fewer residences being offered for short-term rentals compared to the current level of short-term rental activity in the City, and better regulation of the activity of sharing certain primary residences for short-term rentals. Both results are not anticipated to create a foreseeable physical impact on the environment. As set forth in more detail below, the City has reached these conclusions after conducting extensive investigation and research regarding the effects of implementation of the same or comparable regulations in other cities and jurisdictions.

### **Existing Environmental Setting**

For the purpose 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.). The following provides a summary of the existing home-sharing activity in the City based upon data and information currently available. It should be noted that though short-term rental activity in the City of Los Angeles is largely prohibited by the City's Zoning Code, the City has been unable to regulate or enforce the City's prohibition of short-term rentals due to limited resources. As demonstrated by the data provided below, this inability to enforce the prohibition has led to considerable growth of the short-term rental industry in Los Angeles.

Short-term rentals have an increasingly larger presence in various neighborhoods of the City, despite their current illegality in all but a few cases (legal Bed and Breakfasts or Transient Occupancy Residential Structures). Based on Citywide data provided by short-term rental services company Host Compliance, LLC, as of October 2017<sup>1</sup> there are approximately 28,918 active short-term rental listings within the City of Los Angeles, which represent approximately 23,151 unique short-term rental units after duplicates and units available for longer-term stays are excluded.<sup>2</sup>

Of these 28,918 active short-term rental listings, approximately 19,953 (69%) are "entire home" listings. However, not all of these homes are actively rented or otherwise empty year-round, and therefore do not necessarily represent a loss in housing stock. Some of these "entire home" listings may be rented out to long-term tenants, or occupied by the homeowner, for the majority of the year. To better understand the potential impact of short-term rental listings on the housing stock, it is helpful to analyze the number of nights that a listing is rented per year. Table 1, on the following page, shows the estimated nights per year that active short-term rental listings are rented.

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<sup>1</sup> Host Compliance, LLC. *Los Angeles: Short-Term Rental Market Overview*. October 2017.

<sup>2</sup> The number of active short-term rental listings (28,918) refers to all online advertisements on a short-term rental hosting platform, regardless of ownership, duplication or type of activity. This may include properties that do not necessarily meet the definition of a short-term rental, such as hotel room listings that are advertised on the platform. The number of unique short-term rental properties (23,151) reflects a more narrowly-tailored estimate, from which listings that do not meet the short-term rental definition have been excluded. This number has been further tailored to remove multiple listings located at a single property.

*Table 1. Estimated Annual Nights Rented Per Year for Short-Term Rental<sup>3</sup>*

<b>Nights Hosted</b>	<b>Number of Listings</b>	<b>% of Listings</b>
<b>0 nights</b>	10,653	36.8%
<b>1 to 30 nights</b>	2,027	7.0%
<b>31 to 90 nights</b>	4,850	16.8%
<b>91 to 120 nights</b>	2,147	7.4%
<b>121 to 180 nights</b>	2,673	9.2%
<b>Over 180 nights</b>	6,588	22.8%
<b>Total Listings</b>	<b>28,938</b>	<b>100.0%</b>

Source: Host Compliance LLC. October 2017. Los Angeles: Short-Term Rental Market Overview

The Host Compliance report estimates there are a total of 11,408 listings in Los Angeles renting for more than 90 days in the last year, with about 6,588 rented for more than 180 days. Units rented for more than 90 days a year as short-term rentals are unlikely to be available as long-term rentals, due to the fact that they would be unavailable for typical year-long leases. Therefore, one way of estimating the number of short-term rental listings that are likely to be unavailable for long-term rentals in Los Angeles is to consider this range of 6,588 to 11,408 units. When factoring in listings that do not meet the definition of a short-term rental, the range of unique housing units used primarily for short-term rentals is estimated to range between approximately 6,000-10,000 housing units.

Compared to the number of total housing units in the City (1.45 million), the range of 6,000-10,000 housing units potentially lost to short-term rentals is a relatively small fraction (less than 1 percent). However, the growth of the practice and its concentration in certain neighborhoods influences housing availability in an increasing number of communities throughout Los Angeles. This is particularly evident in Council Districts 4, 11, 13 and 5, as shown in Table 2, on the following page. The proposed ordinance is intended to limit these effects.

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<sup>3</sup> Note that due to rounding errors and updates to available data, the total number of listings summarized in this table does not precisely equal the number of active short-term rental listings referenced elsewhere in this document. While there is some variation in the data reported, the general ratios are indicative of larger trends.

*Table 2. Estimated Number of Active Short Term Rental Listings by Council District*

<b>Council District</b>	<b>Number of Active Short-Term Rental Listings</b>	<b>Percent of Total</b>
1	1,860	6.4%
2	1,518	5.2%
3	709	2.5%
4	6,012	20.8%
5	3,499	12.1%
6	305	1.1%
7	107	0.4%
8	420	1.5%
9	211	0.7%
10	1,876	6.5%
11	5,842	20.2%
12	334	1.2%
13	4,157	14.4%
14	1,866	6.5%
15	202	0.7%
<b>TOTAL</b>	<b>28,918</b>	<b>100.0%</b>

Source: Host Compliance LLC. October 2017. Los Angeles: Short-Term Rental Market Overview

Host Compliance data from May 2016 and October 2017 show that short-term rental activity had increased by 45 percent over that 16-month period, which translates to a 34 percent annual growth rate when adjusted to a 12-month period.<sup>4</sup> Given the range of 6,000-10,000 longer-term rental units that are potentially lost as a result of short-term rental activity, a 34 percent growth

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<sup>4</sup> These past growth rates are not an indicator of future growth under the proposed Home-Sharing Ordinance.

rate indicates an increase of approximately 1,500 to 2,500 longer-term rental units lost in the last year. While not all of these spaces would necessarily be rented out to a long-term tenant otherwise, that could be a viable alternative in many cases. For perspective, the City has lost about 1,300 units subject to the Rent Stabilization Ordinance (RSO) each year from all demolitions and condominium conversions combined since 2001.

## **Proposed Ordinance**

This document provides an analysis of the most current version of the proposed ordinance, which contains additional provisions that the City Council requested DCP draft and include for purposes of further consideration by the City Council. On December 7, 2016 the City Council's Housing Committee conducted a hearing on the then proposed Home-Sharing Ordinance and after conducting the public hearing voted to recommend removal of the provision that would allow the short-term rental of non-primary residences for up to 15 days per year. On April 10, 2018, the City Council's Planning and Land Use Management (PLUM) Committee considered a March 22, 2018 report from the Department of City Planning, at which time the PLUM Committee voted to recommend modifying the proposed Home-Sharing Ordinance to reduce the number of days a primary residence may be used for short-term rental from 180 days to 120 days, and include additional provisions that would create procedures for short-term rentals to exceed the annual cap for future consideration by PLUM and the City Council. These recommendations were approved by the City Council on May 2, 2018, at which time the City Council referred the proposed revisions to the then draft ordinance to the City Planning Commission for further consideration.

The proposed ordinance includes regulations to permit only a subset of the current, existing short-term rentals. In addition, the short-term rentals permitted by this ordinance will be subject to an enhanced regulatory and enforcement environment. As set forth in the staff recommendation report, and modified by City Council as explained above, the ordinance includes the following key provisions:

1. All short-term rentals must be registered with the City (proposed LAMC Section 12.22 A.31(d)).
2. Only primary residences may be shared as short-term rentals (proposed LAMC Section 12.22 A.31(c)(2)).
3. Residences that are subject to the City's Rent Stabilization Ordinance are prohibited as shared short-term rentals (proposed LAMC Section 12.22 A.31(c)(2)).
4. Primary residences may be shared as a short-term rental for no more than 120 days per year, unless additional approval has been granted to exceed the cap and certain conditions have been met (extended home-sharing) (proposed LAMC Section 12.22 A.31(j)).
5. Rental units may only be utilized for home-sharing if the tenant obtains written approval by the landlord (proposed LAMC Section 12.22 A.31(c)(2)). Additionally, landlords may proactively preclude rental units from being used for home-sharing by submitting a written request to the Department of City Planning.

6. Full-time vacation rentals are still prohibited (proposed LAMC Section 12.22 A.31(d)).

The proposed ordinance includes procedures to allow for short-term rentals to exceed the annual cap, called “extended home-sharing.” Administrative approvals for extended home-sharing would require adherence with a set of requirements, would be valid for one year and would require annual renewal. The requirements are set forth in Section 12.22 A.31(j) of the Proposed Ordinance and include a requirement that there are no enforcement actions involving the short-term rental residence or the short-term rental host as the result of any nuisance violation. If properties are not able to meet the criteria for the administrative approval of extended home-sharing, then a discretionary application procedure would be available to participate in extended home-sharing. This discretionary process would require certain findings to be made, as well as CEQA environmental review.

In addition, the ordinance includes additional enforcement tools and resources, including setting aside 10% of the anticipated revenue from the Transient Occupancy Tax, which would be used to enforce the provisions of the ordinance.

### **Analysis**

The proposed ordinance contains numerous provisions the City reasonably believes will lead to lower or decreased rates of short-term rental activity as a result of increased enforcement of new requirements. Currently, short-term rentals are not authorized by existing regulations. As a result of adopting the proposed ordinance, the City will better be able to enforce against illegal short term rentals. Although the proposed ordinance would allow for legal home-sharing uses for the first time in the City, it is expected that the new requirements will reduce home-sharing activity over the level of illegal short-term rental activity that is currently occurring, by providing a better enforcement mechanism.

In addition to increased enforcement ability, the proposed ordinance includes several requirements which are anticipated to reduce the amount of short-term rental activity in the City. This includes the requirements that all short-term rental listings must register with the City in order to be eligible for home-sharing. The ordinance requires that listings contain a registration number in order to easily verify this requirement, and establishes new procedures and revenue to allow for enforcement of the registration requirement. In addition, the ordinance places limits on the types of properties that would be eligible to participate in short-term rentals, including placing an annual cap on short-term rental properties that limits home-sharing to 120 nights per year, unless additional approval is granted to exceed the cap and certain conditions are met. The ordinance would also place a prohibition on home-sharing in housing units that are subject to the Rent Stabilization Ordinance, which applies to nearly forty-five percent of the City’s total housing units (approximately 620,000 units). The requirement that home-sharing be restricted to one’s primary residence will also disqualify a sizable portion of the current short-term rental operators, as further explained below.

While definitive numeric break-downs of the potential effects of the enforcement of specific provisions of the proposed ordinance are not available, the ordinance would have the greatest impact on the more active and intensively used listings, specifically the full-time short-term rental of single family residences as vacation rentals. These properties are currently illegally participating in short-term rentals as a short-term rental use is not legally authorized by the current Code, and would still be barred from legally participating in home-sharing as a result of the adoption and enforcement of the proposed ordinance. Once the ordinance is in place, however, enforcement resources will be more robust.

The ordinance would also have an impact on the number of RSO units that are used for short-term rentals. According to the 2017 Host Compliance report, approximately fifty-five percent of active short-term rental listings in Los Angeles are located in multi-family buildings. Nearly eighty percent of *multi-family units* in Los Angeles are subject to the Rent Stabilization Ordinance (RSO), so it is possible that as many as forty-four percent of current short-term rental units are in RSO units.<sup>5</sup> These units would still be ineligible for home-sharing under the proposed ordinance, but the enforcement resources will be more robust.

The ordinance would additionally impact the number of short-term rentals that are currently in non-primary residences. A May 3, 2017 Budget Memo published by the City Administrative Officer<sup>6</sup> estimated that enforcement of the primary residency requirement could result in up to a 46% decline in short-term rental booking receipts.<sup>7</sup> While booking receipts cannot be directly translated to individual short-term rental units, it can reasonably be concluded that a prohibition on short-term rental activity in non-primary residences could result in up to approximately a 40% reduction in short-term rental activity.

One way to get a better sense of potential effects is to look at the results in a city that has a robust tourism industry and that adopted similar regulations. In May 2015, Santa Monica passed an ordinance that features important similarities to the City's proposed Home-Sharing ordinance. Like in the proposed Home-Sharing ordinance, Santa Monica limits home-sharing to primary residences, requires registration numbers on listings, and places responsibility on both hosts and hosting platforms to enforce the law.<sup>8</sup> Santa Monica does not have any limits on the number of

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<sup>5</sup> If 55% of STR are in multi-family units, and 80% of multi-family units are subject to the RSO, then approximately 44% of STR could be RSO units (55% x 80% = 44%).

<sup>6</sup> City Administrative Officer. *Budget Memo 118: City Planning - Short-Term Rental Transient Occupancy Tax*. May 3, 2017. <http://cao.lacity.org/budgetmemos/FY%202017-18%20All%20CAO%20Budget%20Memos.pdf>

<sup>7</sup> The CAO report estimated a 63.37% total decline in short-term rental booking receipts; however, 20% of that decline (approximately 15% overall) was attributed to the impact of the (then-proposed) annual cap of 180 days. Since then, the annual cap has been reduced to 120 days, and a new process has been proposed to allow for extended home-sharing activity to extend beyond that cap. Since this extended home-sharing process was not anticipated in the CAO report, the Department has not included the full 63.37% decline in this analysis.

<sup>8</sup> There are differences in the ordinances as well. Santa Monica's ordinance requires that short-term stays be "hosted", meaning the host must reside at the property at the time of the stay (not out of town). However Santa Monica staff responsible for the enforcement of that city's home-sharing ordinance report say they are typically unable to enforce this provision because Santa Monica staff have not identified an

nights per year that a host can operate a home-share. After Santa Monica began implementing the ordinance in June 2015, total short-term listings in the city are estimated to have dropped from about 1,400 listings to less than 1,000 in the first year (a decline of 30%). Based on discussions with staff in Santa Monica, the reduction of online listings in Santa Monica is due in large part to the staff resources devoted to pro-active enforcement. The City's proposed Home-Sharing ordinance requires that significant resources be dedicated to the enforcement of the ordinance, in particular efforts against illegal listings. This level of resources would allow for a combination of staff resources and third party consultants to enforce the law in the same manner as has been done in Santa Monica.

San Francisco also adopted an ordinance (effective February 2015) that is similar to the proposed Home-Sharing ordinance. Specifically, San Francisco's ordinance limits short-term rentals to primary residences, requires hosts to register as a business, and limits unhosted rentals (which occur when the host is not present in the unit during the guests' stay) to 90 nights per year. The San Francisco Chronicle published a report on February 16, 2018 which showed a 55 percent reduction in short-term rental listings in the City as a result of enforcement of the ordinance.<sup>9</sup> The 55 percent reduction was observed after the City began enforcing registration requirements on January 16, 2018, based on a comparison of the number of active listings on home-sharing platforms Airbnb, HomeAway and FlipKey on August, 29 2017 and January 19, 2018. In particular, the largest reduction in short-term rental listings was observed in neighborhoods that have higher proportions of renters, due in part to the requirement that renters need landlord approval to register for home-sharing. The same requirement would apply under the City's proposed Home-Sharing ordinance, and as such it is anticipated that a similar decline would be observed in Los Angeles.

Based on these available assumptions and the actual results observed in cities with comparable regulations, the City reasonably estimates that the impact of enforcement of the proposed ordinance would reasonably result in approximately a 20% to 40% reduction in short-term rental activity. Based on the data available from Host Compliance, the City would expect that this would lead to a reduction to between approximately 11,000 and 15,000 active listings from the baseline range of 18,285 active listings (those that are rented for one or more nights per year). This estimate is in line with the impacts observed in the City of Santa Monica and the City and County of San Francisco, both of which recently adopted similar regulations. This estimate is based on the assumption that most short-term rental activity that is currently illegal activity would discontinue after adoption of the ordinance; however, it is possible that the reduction may not be as drastic if current short-term rental hosts qualify for home-sharing registration and are thereby able to continue renting out portions of their home on a short-term basis. Nevertheless, the City anticipates a reduction in home-sharing activity as a result of enforcement of the proposed ordinance.

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effective tool to enforce this rule. The proposed Los Angeles ordinance prohibits home-sharing in units subject to the Rent Stabilization Ordinance, which disqualifies nearly half of the City's housing stock from participating in home-sharing.

<sup>9</sup> Carolyn Said, "A Leaner Vacation Market," San Francisco Chronicle, February 16, 2018.  
<https://www.sfchronicle.com/business/article/SF-short-term-rentals-transformed-as-Airbnb-12617798.php>



In addition to considering the direct effects of the proposed ordinance on short-term rental activity in the City, staff also considered whether there would be any anticipated indirect impacts on hotel and motel occupancy rates. Specifically, staff considered whether stays in residential short-term rentals may currently lead to reduced demand for typical hotels, motels and bed and breakfasts; and whether a potential impact of the reduction in short-term rental activity in the City may result in increased demand and occupancy rates. The best research the City has located regarding the relationship between hotels and short-term rentals is based on a study of Airbnb stays in Austin, TX<sup>10</sup>. While the study found a significant inverse relationship between hotel revenues and Airbnb stays, it found a near-zero impact on occupancy rates, which is a more relevant metric for assessing potential environmental impacts. Specifically, the study found that a 10% increase in Airbnb listings is associated with a .0005 percent decrease in hotel occupancy rates. This is in line with current information in Los Angeles, where demand for hotel rooms has increased in recent years, despite the ascendance of short-term rentals<sup>11</sup>. Given this assumption, if a 20-40% reduction in short-term activity were to occur as a result of the proposed ordinance, as is reasonably estimated above, changes in hotel occupancy rates would be negligible (an estimated .001-.002 percent increase). This .001 to .002 percent projected increase compares to a decrease in occupancy rate of 1.6% recorded in Los Angeles County through 2017. The impacts of the proposed ordinance on hotel and motel occupancy rates are thereby considered negligible.

In the longer term, short-term rentals may be seen to also affect the hotel industry's investment and development decisions. However, there is no clear evidence of this potential outcome in Los Angeles. During a period of rapid increase in the number of short-term rentals, hotel development has also undergone a significant increase. In January 2016, the Los Angeles Tourism and Convention Board reported that approximately 83 new hotels, with 14,650 guest rooms, were under development. Given current behavior of the hotel industry in constructing a significant number of hotels during a time when the number of short-term rentals have also increased significantly, the proposed ordinance restricting short-term rentals is not likely to influence decisions related to hotel construction. The larger factor is clearly the higher demand for short-term stays overall, as reflected by a record number of visits to the Los Angeles region as well as the record number of hotel room nights sold in 2017 (29.4 million). The increase in hotel development will be sufficient to absorb the largely insignificant increase in hotel occupancy rates associated with the ordinance.

As stated above, there is currently very little effective enforcement against short-term rentals in the City of Los Angeles, the vast majority of which are believed to be operating in violation of current Municipal Code regulations. Therefore, if someone is interested in renting out residential space on an online hosting platform, they are unlikely to wait until a new regulatory system is put in place to engage in such activities. They are already engaging in short-term rental activities. This conclusion is reinforced by the data provided above that show that as of October 19, 2017 there are approximately 28,918 active short-term rental listings in the City of Los Angeles.

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<sup>10</sup> Georgios Zervas, Davide Proserpio, and John W. Byers (2017). The Rise of the Sharing Economy: Estimating the Impact of Airbnb on the Hotel Industry. *Journal of Marketing Research*: October 2017, Vol. 54, No. 5, pp. 687-705.

<sup>11</sup> Los Angeles Tourism and Convention Board. Los Angeles Tourism Quick Facts 2017

As such, the proposed ordinance would not likely induce any new short-term rentals to take place. On the contrary, as discussed above, it is anticipated that the number of short-term rentals is likely to decline as a result of the proposed ordinance. The City expects many owners of the few thousand homes that would be ineligible for Home-Sharing will discontinue renting their housing units as short-term rentals. Many are likely to end or shorten their activities to fewer than 120 days, leading to a net reduction in short-term rental activity Citywide. This reduction is anticipated to occur, even in light of the City Council recommendations to allow for properties to apply for extended home-sharing beyond the 120-day limit. While it is not known how many hosts would be eligible to apply for extended home-sharing, there are currently approximately 7,500 properties that provide home-sharing for more than 120 days per year. It is important to note, however, that many of these properties would not be eligible for home-sharing or extended home-sharing under the primary residence requirement, prohibition on home-sharing in RSO units, and other requirements. Thus, the net effect of the requirements of the proposed ordinance, along with additional resources for enforcement, are expected to result in a reduction in the number of short-term rentals in the City. For the purposes of CEQA, these reductions are therefore anticipated to result in a reduction in environmental impacts caused by short-term rentals, and as such the proposed Home-Sharing ordinance is not expected to have a significant impact on the environment.

At the more local level, the impact on the residential environment is also likely to be minimal regardless of the exact magnitude of the change in short-term rental activity. With the regulations set forth by the Home-Sharing ordinance, the operation of short-term rental uses would be similar to the operation of a regular occupied home in any residential neighborhood. In fact, oftentimes a bedroom or unit that is used exclusively for a short-term rental is likely to be used less intensely than a full-time, long-term occupied bedroom or unit, and would also be vacant more frequently than a unit or bedroom that is used exclusively as a permanent residence (and as such would have lower operational impacts).

Finally, because only primary residences may be used for short-term rentals, there is no economic incentive to construct new residences for short-term rentals. The City's ordinance should ensure that short-term rental activity will only be an ancillary use to the primary residential use of the residence.

## **EVALUATION**

### **Summary**

The above analysis concludes that short-term rental activity is likely to decline as a result of the ordinance for the following reasons: (1) the ordinance as proposed permits only residential units used as primary residences to be used as short-term rentals; (2) the ordinance prohibits residential units subject to the City's Rent Stabilization Ordinance stabilization ordinance from use as short-term rentals; (3) the ordinance permits an individual or entity to list only one unit or single family residence as a short-term rental; (4) the ordinance limits home-sharing to an annual cap of

120-days, unless additional approval is granted to exceed the cap and certain additional conditions are met; (5) the ordinance requires that all short-term rentals be registered with the City; (6) the ordinance requires renters who seek to rent their units as short term rentals to obtain permission from their landlords; and (7) the ordinance mandates that ten percent (10%) of the TOT revenue generated from home-sharing rentals be allocated for administration and enforcement of the ordinance's regulations and prohibitions. These regulations will necessarily limit the units available to be used as short-term rentals and may discourage individuals that are currently listing units or residences as short-term rentals from continuing to do so because of the registration requirement and the additional regulations and enforcement. Reductions in the number of short-term rentals should be more pronounced in areas with greater concentrations of entire residences that are listed as short-term rentals. The proposed ordinance amends Sections 12.03, 12.22, 12.24, 19.01 and 21.7.2 of the Los Angeles Municipal Code (LAMC) and will be applicable to all parcels in which residential uses are permitted or currently exist.

Below is a discussion of potential impacts in each environmental topic area. In most cases, impact areas are not impacted at all, or only tangentially. In cases where there may be a potential effect, the net result would be minor. As a result, the Initial Study finds no potential impacts.

This evaluation is a programmatic review of the impact of short-term rentals on residential neighborhoods.

## 1. AESTHETICS

### a) Would the project have a substantial adverse effect on a scenic vista?

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably expected or intended to occur as a result of the implementation of the proposed ordinance. There will be no 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) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably expected to occur for the reasons set forth above. It does not include scenic resources within a state scenic highway. No impact related to the ordinance will occur.

### c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new

development is expected to occur for the reasons set forth above. The existing visual character or quality of the site and its surroundings will not be impacted.

- d) **Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new developments will occur. It will not introduce new sources of substantial light or glare. No impact related to this issue would occur.

## 2. AGRICULTURE AND FORESTRY RESOURCES

- a) **Would the project 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is expected to occur for the reasons set forth above. It will not impact or convert any farmland to non-agricultural use. Therefore, no impacts related to this issue would occur.

- b) **Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is expected to occur for the reasons set forth above. 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) **Would the project 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is expected to occur for the reasons set forth above. It will not change any land zoned as forest land or timberland. Therefore, no impacts related to this issue would occur.

- d) **Would the project 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable for the reasons set forth above. It does not

propose changes to any forest land. Therefore, no impacts related to this issue would occur.

- e) **Would the project involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland, to non-agricultural use?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is expected to occur for the reasons set forth above. No agricultural uses are included as part of the project. Therefore, no impacts related to this issue would occur.

### 3. AIR QUALITY

- a) **Would the project conflict with or obstruct implementation of the applicable air quality plan?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. For the reasons set forth above, it is not anticipated the Home-Sharing Ordinance will result 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. As such, it will not conflict or obstruct implementation of applicable air quality plan.

- b) **Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. For the reasons set forth above, it is not anticipated the Home-Sharing Ordinance 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 proposed Ordinance will not violate air quality standards or contribute substantially to an existing or projected violation.

- c) **Would the project 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 (including releasing emissions, which exceed quantitative threshold for ozone precursors)?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. For the reasons set forth above, it is not anticipated the Home-Sharing Ordinance will result in an increase in use of residences, an increase in traffic or a change in traffic patterns that would increase or change vehicular emissions from existing conditions. Accordingly, short-term rental activities permitted by this proposed Ordinance will not directly or indirectly result in the cumulative net increase

of any criteria pollutant for which the region is currently in non-attainment. No related impacts would occur.

**d) Would the project expose sensitive receptors to substantial pollutant concentrations?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. For the reasons set forth above, it is not anticipated the Home-Sharing Ordinance 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 proposed Ordinance 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.

**e) Would the project create objectionable odors affecting a substantial number of people?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. As such, activities permitted by the proposed Ordinance would not result in the reasonably foreseeable creation of objectionable odors and therefore no impact.

#### **4. BIOLOGICAL RESOURCES**

**a) Would the project 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 regulation, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. 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) Would the project 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 Game or U.S. Fish and Wildlife Service?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. As such, activities permitted by the proposed Ordinance would not result in reasonably foreseeable impacts to habitats or natural communities referenced in the above question.

- c) **Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. As such, activities permitted by the proposed Ordinance would not result in the reasonably foreseeable impacts to any wetlands.

- d) **Would the project 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. As such, activities permitted by the proposed Ordinance would not result in a reasonably foreseeable impact or modification to any wildlife corridors.

- e) **Would the project 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. As such, activities permitted by the proposed Ordinance would not result in a reasonably foreseeable conflict with existing policies protecting biological resources. Therefore, no impacts related to this issue would occur.

- f) **Would the project 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. 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.

## 5. CULTURAL RESOURCES

- a) **Would the project cause a substantial adverse change in the significance of a historical resource as defined in §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 were to adversely affect a historical resource meeting one of the above definitions. Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. 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 ordinance 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 ordinance would not cause a substantial adverse change in the significance of a historical resource as defined in §15064.5. Therefore, no impacts related to historical resources would occur as a result of the ordinance.

**b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. No grading or excavation is proposed as part of the project nor are such activities a reasonably foreseeable consequence of activities authorized by the proposed Ordinance. Therefore, no impacts related to this issue would occur.

**c) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. No grading or excavation is proposed as part of the project nor are such activities a reasonably foreseeable consequence of activities authorized by the proposed Ordinance. Therefore, no impacts related to this issue would occur.

**d) Would the project disturb any human remains, including those interred outside of formal cemeteries?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. No grading or excavation is proposed as part of the project nor are such activities a reasonably foreseeable consequence of activities authorized by the proposed Ordinance. Therefore, no impacts related to this issue would occur.



## 6. GEOLOGY AND SOILS

**Note:** In light of the California Supreme Court’s ruling in the case of *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal. 4th 369, the focus of the analysis of the questions set forth in subparts (a),(c) and (d) shall focus on whether the activities authorized by the proposed Ordinance could either create the hazards identified in the questions or exacerbate existing physical conditions so as to potentially cause the hazards identified in the questions.

a) **Would the project expose people or structures to 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. As such, the activities permitted by the proposed Ordinance 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. As such, the activities permitted by the proposed Ordinance 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. As such, the activities permitted by the proposed Ordinance would not cause a 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 single family uses.

- (iv) **Landslides?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. As such, the activities permitted by the proposed Ordinance would not cause reasonably foreseeable

landslides nor exacerbate existing environmental conditions so as to potentially cause landslides.

**b) Would the project result in substantial soil erosion or the loss of topsoil?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. As such, the activities permitted by the proposed Ordinance 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) Would the project 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. As such, the activities permitted by the proposed Ordinance 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 of these geological events.

**Would the project be located on expansive soil, as identified on Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. As such, the activities permitted by the proposed Ordinance would not cause soil to become unstable resulting in reasonably foreseeable exacerbation of the existing expansive soil conditions. Therefore, no related impacts would occur.

**d) Would the project 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. 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.

## 7. GREENHOUSE GAS EMISSIONS

- a) **Would the project 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. For the reasons set forth above, it is not anticipated the Home-Sharing Ordinance 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 proposed Ordinance will not cause an increase in cumulative greenhouse gas emissions.

- b) **Would the project 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. For the reasons set forth above, it is not anticipated the Home-Sharing Ordinance 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 proposed Ordinance will not conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing greenhouse gases.

## 8. HAZARDS AND HAZARDOUS MATERIALS

- a) **Would the project 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. Furthermore, it is not reasonably foreseeable that the activities permitted by the proposed Ordinance would involve routine transport, use, or disposal of hazardous materials. Therefore, no impacts related to this issue would occur.

- b) **Would the project create 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. 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) Would the project 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. As discussed, it does not involve emission or handling of hazardous materials. Therefore, no impacts related to this issue would occur.

- d) Would the project 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. The activities permitted by the proposed Ordinance would not result in short-term rental uses occurring on sites other than existing residential dwellings. As such, the proposed Ordinance 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 for people residing or working in the project area?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. Therefore, no impacts related to this issue would occur.

- f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. Therefore, no impacts related to this issue would occur.

- g) Would the project 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. No aspects of the ordinance 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.

- h) **Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

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

## 9. HYDROLOGY AND WATER QUALITY

- a) **Would the project violate any water quality standards or waste discharge requirements?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. 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) **Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. Within the City, it is not expected that home-sharing as defined by the ordinance would result in a significant increase in water usage that would have an impact on groundwater supplies.

- c) **Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. Therefore, it would have no impact on existing drainage patterns.

- d) **Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. Therefore, it would have no impact on existing drainage patterns.

- e) **Would the project 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?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. Therefore, it would have no impact on runoff water which would exceed the capacity of existing or planned stormwater drainage systems.

- f) **Would the project otherwise substantially degrade water quality?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. Therefore, it would have no impact on water quality.

- g) **Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. Therefore, no impacts related to this issue would occur.

- h) **Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. Therefore, no impacts related to this issue would occur.

- i) **Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. There is no potential to increase risk involved with flooding. Therefore, no impacts related to this issue would occur.

- j) **Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. There is no potential to increase risk involved with seiche, tsunami, or mudflow. Therefore, no impacts related to this issue would occur.

## 10. LAND USE AND PLANNING

**a) Would the project physically divide an established community?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. There will be no physical division of an established community. Therefore no related impacts would occur.

**b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. There would be no conflict with any applicable land use plan, policy, or regulation. Therefore no related impacts would occur.

**c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?**

**No Impact** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. Therefore, it would not conflict with any applicable habitat conservation plan or natural community conservation plan, and impacts related to this issue would occur.

## **11. MINERAL RESOURCES**

**a) Would the project 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. Thus, it 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 issue would occur.

**b) Would the project 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. Thus, it 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 issue would occur.

## **12. NOISE**

- a) **Would the project result in exposure of persons to or generation of noise levels 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. 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 home-share rentals so as to violate local noise ordinance. 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 home-sharing. In fact, because the ordinance prohibits all full-time vacation home rentals, there is the potential for a decrease in the number of vacation rentals, which could lead to the possible decrease in noise levels related to the operation of home-sharing.

- b) **Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. There is no potential for this ordinance to facilitate the exposure to groundborne vibration or noise. Therefore, no impacts related to issue would occur.

- c) **Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**

**Less than Significant Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. 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 home-share rentals so as to violate local noise ordinance. Furthermore, it is anticipated that enforcement of existing Municipal Code noise regulations will generally ensure excess noise does not result from home-sharing. In fact, because the ordinance prohibits all full-time vacation home rentals, there is the potential for a decrease in the number of vacation rentals which could lead to the possible decrease in noise levels related to the operation of home-sharing.

- d) **Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?**

**Less than Significant Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. 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 home-share rentals so as to violate local noise ordinance. Furthermore, it is anticipated that enforcement of existing noise Municipal Code regulations, for which funding is provided by the proposed Ordinance, will generally ensure excess noise does not result from home-sharing. In fact, because the ordinance prohibits all full-time vacation home rentals, there is the potential that implementation of this ordinance will actually result in a general decrease in noise levels associated with home-sharing activities.

- 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 expose people residing or working in the project area to excessive noise levels?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. Additionally, major airports have an airport land use plan that provides guidance on noise levels and land use in adjacent areas. 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 ordinance would not expose people residing or working in the Project area to excessive noise levels and no impact would occur.

- f) **For a project within the vicinity of a private airstrip, 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. Therefore, the ordinance would not expose people residing or working in the Project area to excessive noise levels and no impact would occur.

### 13. POPULATION AND HOUSING

- a) **Would the project induce substantial 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. There is no potential for inducing population growth; therefore no related impacts would occur.

**b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?**

**Less than Significant Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. Furthermore, the ordinance requires the dwellings used for home-sharing to be a person's primary residence. Therefore, it would not displace any existing housing, necessitating the construction of replacement housing elsewhere.

**c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?**

**Less than Significant Impact.** The Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is expected to occur for the reasons set forth above. Furthermore, generally the ordinance requires the dwellings used for home-sharing to be a person's primary residence. Therefore, it would not displace any residents, necessitating the construction of replacement housing elsewhere.

## **14. PUBLIC SERVICES**

**a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government 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 objective for any of the following public services:**

**(i) Fire protection?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. Furthermore, there is no evidence that home-sharing would increase demands on fire protection services so as to require the construction of new or expanded facilities. Therefore, no related impacts would occur.

**(ii) Police protection?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. Furthermore, there is no evidence that home-sharing would increase demands on police protection services so as to require the construction of new or expanded facilities. Therefore, no related impacts would occur.

**(iii) Schools?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. Furthermore, there is no evidence that home-sharing would increase demands on schools so as to require the construction of new or expanded school facilities. Therefore, no related impacts would occur.

**(iv) Parks?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. Furthermore, there is no evidence that home-sharing would increase demands on parks so as to require the construction of new or expanded park facilities. Therefore, no related impacts would occur.

**(v) Other public facilities?**

**Libraries**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. Furthermore, there is no evidence that home-sharing would increase demands on libraries so as to require the construction of new or expanded library facilities. Therefore, no related impacts would occur.

## **15. RECREATION**

- 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?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. Furthermore, there is no evidence that home-sharing 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. Therefore, the construction or expansion of recreational facilities would not be required. Therefore, no related impacts would occur.

## **16. TRANSPORTATION AND TRAFFIC**

- a) **Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. For the reasons set forth above, it is not anticipated the Home-Sharing Ordinance 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) **Would the project 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 count congestion management agency for designated roads or highways?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. For the reasons set forth above, it is not anticipated the Home-Sharing Ordinance 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) **Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. As discussed, it is anticipated that the proposed ordinance would likely result in a decrease in home-sharing activity; therefore, it is not expected that there would be any increase in the number of people visiting the City via airplane as a result of the ordinance. Thus, the ordinance would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. Therefore, no impacts related to this issue would occur.

- d) **Would the project substantially increase hazards due to a 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. For the reasons set forth above, it is not anticipated the Home-Sharing Ordinance 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.

**e) Would the project result in inadequate emergency access?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. Therefore, no related impacts would occur.

**f) Would the project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is reasonably foreseeable. Therefore, no related impacts would occur.

## **17. TRIBAL CULTURAL RESOURCES**

**a) Would the project be 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is expected to occur for the reasons set forth above. Most tribal cultural resources are anticipated with buried resources and land valued for association with tribal practices. The Home-Sharing ordinance will not result in any excavation of soils or ground disturbance. Therefore, no related impacts would occur.

**b) Would the project be 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 Resources 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is expected to occur for the reasons set forth above. Most tribal cultural resources are anticipated with buried resources and land valued for association with tribal practices. The Home-Sharing ordinance will not result in any excavation of soils or ground disturbance. 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 AB 52 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 Home-Sharing Ordinance was provided on June 28, 2018 to tribes who have requested such notice in the City of Los Angeles, and no tribes requested consultation.

## 18. UTILITIES AND SERVICE SYSTEMS

- a) **Would the project exceed wastewater treatment requirements of the applicable regional water quality control board?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is expected to occur for the reasons set forth above. The Home-Sharing ordinance is not intensifying the use of any existing residential structures beyond the baseline conditions. There is no evidence that home-sharing of primarily primary residences results in significant increases in the generation of wastewater. Therefore, no related impacts would occur.

- b) **Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is expected to occur for the reasons set forth above. There is no evidence that home-sharing generally results in significant increases in water usage or waste water generation that would require the construction of new water or wastewater treatment facilities or expansion of existing facilities. Therefore, no related impacts would occur.

- c) **Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is expected to occur for the reasons set forth above. It does not propose construction of new storm water drainage facilities or expansion of existing facilities. Therefore, no related impacts would occur.

- d) **Would the project have significant water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is expected to occur for the reasons set forth above. Therefore, no related impacts would occur.

- e) **Would the project 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 Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is expected to occur for the reasons set forth above. Therefore, no related impacts would occur.

- f) **Would the project be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is expected to occur for the reasons set forth above. Therefore, no related impacts would occur.

- g) **Would the project comply with federal, state, and local statutes and regulations related to solid waste?**

**No Impact.** Based upon the analysis set forth above, the Home-Sharing ordinance only affects the use of existing residential structures in established neighborhoods and no new development is expected to occur for the reasons set forth above. 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.

## 19. **MANDATORY FINDINGS OF SIGNIFICANCE**

- a) **Does the project have the potential to 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, 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 Home-Sharing ordinance would not have the potential to 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, 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 5, Cultural Resources** and **Section 17, Tribal Cultural Resources**, the Home-Sharing ordinance 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 Home-Sharing ordinance would not potentially result in any significant impacts and would not have the potential to contribute to significant 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 Home-Sharing ordinance would not potentially cause substantial adverse effects on human beings, either directly or indirectly.

**CONCLUSION**

Based upon the information set forth above, in the staff report related to this ordinance 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.



Attachment



# Los Angeles: Short-Term Rental Market Overview

By Host Compliance, LLC

**October 2017**



## I. Background & Methodology

Like communities around the world, the City of Los Angeles is interested in effectively and efficiently responding to the rapid growth of Internet-facilitated short-term rentals (STRs) in ways that best fit the needs of residents and neighborhoods. Host Compliance LLC has gathered data on the short-term rental market in Los Angeles and its districts to provide independent facts to facilitate a larger discussion of community goals, enforcement systems, and finding a workable balance in a dynamic environment. This report summarizes data collected in October 2017.

As a software, data and consulting services provider exclusively focused on helping local governments overcome the challenges associated with short-term vacation rentals, Host Compliance LLC has developed a set of proprietary data and analytics tools that can provide deep insights into the scale and scope of the short-term rental activity in any community. In this report, we will provide our findings from Los Angeles, with the hope that this fact-base will help inform the debate about how short-term rentals could be regulated in the City in the years to come.

### *General Methodology*

Host Compliance's data is collected weekly and we currently collect, aggregate and deduplicate all listing data, reviews, calendar info and photos across the world's 24 top short-term rental listing sites.<sup>1</sup> We estimate this represents 99% of the total vacation rental universe in Los Angeles's jurisdiction.

Gathering data across platforms presents unique presentation problems. One listing may list on multiple sites, or might be listed in multiple forms on the same site, and analysis can quickly be bogged down by constantly switching between unique rental units, listings, active listings, de-duplicated listings, etc. In this document, unless preceded by a modifier, 'listings' refers to all online advertisements, regardless of ownership, duplication, or activity. Each profile will give a breakdown between listings, active listings, listings that qualify as STRs, and unique rental units.

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<sup>1</sup> Airbnb.com, Booking.com, Agoda.com, Flipkey.com, HolidayLettings.com, HouseTrip.com, Niumba.com, HomeAway.com, VRBO.com, VacationRentals.com, travelmob.com, BedandBreakfast.com, HomeAway.co.uk, OwnersDirect.co.uk, HomeAway.de, Abritel.fr, Homelidays.com, HomeAway.es, Toprural.es, AlugueTemporada.com.br, HomeAway.com.au, Villas.com, Stayz.com.au, Bookabach.co.nz



Active listings are defined as any listing that has either had its booking calendar changed or received a review in the last year. These are strong indicators that a host is still actively managing a listing. Using information on activity, nightly minimum stays, and rental price, Host Compliance has been able to produce estimates of potential monthly and yearly revenue both for individual units and on a neighborhood-scale. These estimates can only be verified by a host-by-host audit.

### *Data Used for This Report*

Host Compliance's raw data can be analyzed by a number of parameters including:

- Listing site
- Location (as defined by a boundary box or polygon i.e. a neighborhood)
- Property type (e.g. single-family or multi-family)
- Room type (e.g. entire home, private room, shared room)
- Number of bedrooms and bathrooms, rental rate, and minimum rental period
- Host Name/ID
- Activity and revenue estimates
- First and last review date
- Date the property was first active

The data contained in this report is believed to be highly accurate and representative of the scale and scope of the short-term rental activity in Los Angeles as of the date of this report.

### *Data Note*

The data contained in this report was collected on or before October 7, 2017. Small differences in individual lines – discrepancies between listings numbers and percentages, percentages that add up to more or less than 100% - may be the result of rounding or updated data.

All of these numbers represent a moment in time, a specific snapshot of the marketplace as it is on the day of collection. Short-term renting is a dynamic, rapidly evolving industry, with individual hosts and entire listing platforms changing on a moment's notice. Absolute numbers change daily and can never truly be captured in a report. Instead, consider the themes, ratios, and trends as indicative, even if the data varies slightly.

## *Host Compliance Team*

### **Jeffrey Goodman**

Jeffrey is an urban planner and considered one of North America's leading authorities on short-term rentals and how they impact communities. He has contracted with both the City of New Orleans and Airbnb, and advised research on short-term rentals cities including San Francisco, Los Angeles, Portland, New Orleans, and New York. Jeff has spoken about short-term rentals across the country, including at the APA's National Planning Conference. He graduated from Yale College and earned his Masters of Urban Planning from Harvard University. He is the author of a featured article in Planning Magazine on the topic of STRs.

### **David Marcus**

David is a Caltech Applied and Computational Math graduate working at the intersection of data science and geospatial information management with eight years of experience building well-architected scalable software. Prior to Host Compliance, David founded Routefriend.com, a web-based application for planning trips on buses and trains, serving 1.5 million monthly users. David's most recent experience was at DwellAware where he served as the Lead Data Scientist for the data analytics company building products to quantify housing risks and costs for businesses and their customers in the residential real estate sector. Prior to DwellAware, David served in various technical roles at a number of software companies including aboutLife, UrbanMapping, AmericanTowns.com, Nielsen Analytic Consulting and Hewitt Associates. David earned his BS Degree in Applied & Computational Mathematics at California Institute of Technology and his MA in Anthropology from University of Kent.

### **Ulrik Binzer**

Ulrik is the Founder and CEO of Host Compliance, the industry leader in short-term rental monitoring and compliance solutions for local governments. A pioneer in the short-term rental enforcement solution space, Ulrik developed the first short-term rental compliance monitoring tools and now uses his expertise and insights to help local governments across North America implement, monitor and enforce short-term rental regulation. Ulrik previously served in a variety of leadership roles in management consulting, private equity, startups and the military and developed his strategic and analytical skill-set at McKinsey & Company and the Harvard Business School.

### 3. Short-term Rental Data

In the following pages the data on short-term rentals for Los Angeles are summarized, first for the city as a whole and then for the fifteen council districts.

Below are a number of charts that provide a broad overview of the STR market in Los Angeles. Each data sheet will give an overview of the listing types, characteristics, and an estimate of activity in the area. These are summary sheets; a deeper dive is possible with data Host Compliance has gathered.

#### 1. Los Angeles STR Market

Neighborhood	Active Listings	Listings that fit STR definition	Unique Rental Units
District 1	1,860	1,852	1,852
District 2	1,518	1,508	1,207
District 3	709	702	567
District 4	6,012	5,931	4,977
District 5	3,499	3,444	3,444
District 6	305	302	283
District 7	107	106	89
District 8	420	419	265
District 9	211	211	156
District 10	1,876	1,859	1,295
District 11	5,842	5,719	4,164
District 12	334	332	268
District 13	4,157	4,118	2,995
District 14	1,866	1,850	1,432
District 15	202	192	157
<b>TOTAL</b>	<b>28,918</b>	<b>28,545</b>	<b>23,151</b>

# City of Los Angeles

**28,918**

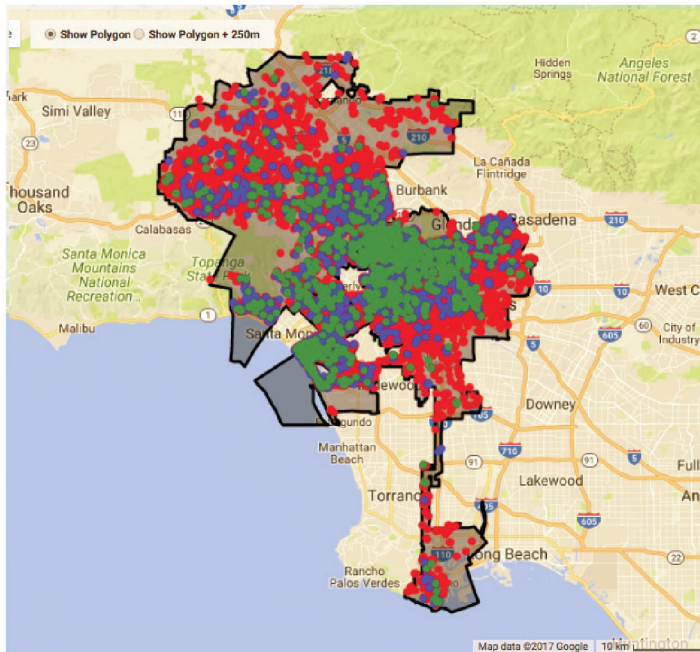
Active listings in jurisdiction

**28,545**

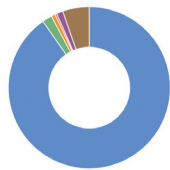
Listings in jurisdiction that fit STR definition

**23,151**

Unique properties in jurisdiction that fit STR definition

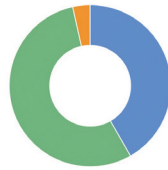


### Minimum Nights



- 1-7 nights [90%]
- 8-14 nights [2%]
- 15-21 nights [1%]
- 22-29 nights [0%]
- 30+ nights [1%]
- Not specified by Host [5%]

### Listing types

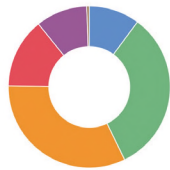


- Single Family Listing [42%]
- Multi Family Listing [55%]
- Unknown [3%]



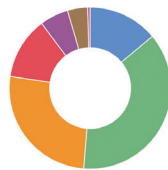
- Partial Home [31%]
- Entire Home [69%]
- Unknown [0%]

### Nightly Rate

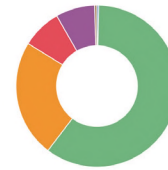


- \$0-\$50 [10%]
- \$50-\$100 [33%]
- \$100-\$200 [32%]
- \$200-\$400 [14%]
- \$400+ [10%]
- not provided [0%]

### Bedrooms / Bathrooms

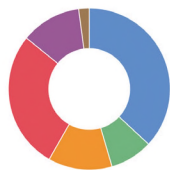


- 0 bedrooms [14%]
- 1 bedroom [37%]
- 2 bedrooms [26%]
- 3 bedrooms [12%]
- 4 bedrooms [6%]
- 5+ bedrooms [4%]
- unknown [1%]



- 0 bathrooms [0%]
- 1 bathroom [60%]
- 2 bathrooms [23%]
- 3 bathrooms [8%]
- 4+ bathrooms [8%]
- unknown [0%]

### Estimated Annual Revenue



- \$0k [37%]
- \$0k-\$5k [9%]
- \$5k-\$10k [13%]
- \$10k-\$25k [28%]
- \$25k-\$50k [12%]
- \$50k+ [2%]

### Est. Annual Nights Rented

