



## DEPARTMENT OF CITY PLANNING

### RECOMMENDATION REPORT

#### CITY PLANNING COMMISSION

**Date:** December 14, 2017  
**Time:** After 12:00 p.m.  
**Place:** Los Angeles City Hall  
200 N. Spring St., Rm. 340  
Los Angeles, CA 90012

**Case No.:** CPC-2017-3409-CA  
**CEQA No.:** ENV-2017-3410-ND  
ENV-2017-4476-CE  
**Location:** Citywide  
**Council District:** All

**PUBLIC HEARINGS:** September 25, 2017  
September 28, 2017

**PROPOSED PROJECT:** An ordinance amending Sections 12.03, 14.00 and 151.02 of the Los Angeles Municipal Code establishing regulations to facilitate the use of existing hotels and motels for Supportive Housing and/or Transitional Housing.

- RECOMMENDED ACTIONS:**
1. **Recommend** adoption of the proposed ordinance (Exhibit A);
  2. **Adopt** the staff report as the Commission's report on the subject;
  3. **Adopt** the attached Findings;
  4. **Recommend** that the City Council determine, based on the whole of the administrative record, that the proposed ordinance is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15301, and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines Section 15300.2 applies; direct staff to file the Notice of Exemption with the County Clerk's office (see Exhibit B.1); and
  5. **Recommend** that the City Council FIND, pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Negative Declaration, No. ENV-2017-3410-ND ("Negative Declaration") (Exhibit B.2), and all comments received, there is no substantial evidence that the project will have a significant effect on the environment; FIND the Negative Declaration reflects the independent judgment and analysis of the City; and **ADOPT** the Negative Declaration.

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# TABLE OF CONTENTS

<b>1. Project Analysis.....</b>	<b>A-1</b>
1. Summary	
2. Background	
3. Proposed Ordinance	
4. Discussion of Key Issues	
5. Conclusion	
<b>2. Public Outreach and Communications.....</b>	<b>P-1</b>
1. Public Outreach and Public Comment Summary	
<b>3. Findings.....</b>	<b>F-1</b>
1. General Plan/Charter Findings	
2. CEQA Findings	
3. Urgency Clause Findings	
<b>4. Exhibits:</b>	
A. Proposed Interim Motel Conversion Ordinance	
B. Environmental Clearance	
B.1 Categorical Exemption	
B.2 Negative Declaration	

## PROJECT ANALYSIS

### 1. Project Summary

This report recommends the adoption of new regulations to allow the temporary re-use of existing transient-use properties, such as motels and hotels, for supportive and transitional housing. The ordinance was drafted in response to Strategy 7C in the City's Comprehensive Homeless Strategy (CF 15-1138-S1) that was adopted by the City Council on February 9, 2016, directing the Department to identify opportunities for adaptive re-use of existing high-density structures such as hotels and motels to bridge housing and supportive housing.

The proposed Interim Motel Conversion (IMC) ordinance creates an application process under the Public Benefit section of the Code and establishes new requirements for Interim Motel Housing Projects. The goals of the proposed ordinance are to promote creative and cost-effective strategies to expand housing solutions for persons experiencing homelessness. If adopted, it would streamline the approval process, allowing existing motels and hotels to be retrofitted and used for supportive and transitional housing for an interim period depending upon the terms of the service contract.

### 2. Background

Homelessness continues to be a major challenge facing the City of Los Angeles. The Los Angeles Homeless Services Authority (LAHSA) count in January 2017 found that approximately 34,189 people are experiencing homelessness in the City of Los Angeles, an increase of 20% from 2016. The City has identified the use of motels and hotels for supportive and transitional housing as one solution to address the immediate need for housing.

There is a need for a diversity of housing solutions to address the varying needs of people experiencing homelessness. Transitional housing is a time-limited housing intervention that provides homeless individuals and families with the interim stability and support to successfully move into and maintain permanent housing, typically within a period of 6 to 24 months. This housing solution is often most suitable for individuals and families who are experiencing homelessness for economic reasons, and require safe and affordable shelter on an interim basis while they stabilize and seek a more long-term housing solution. Supportive housing provides indefinite rental assistance and supportive services to assist homeless persons achieve housing stability. Both transitional housing and supportive housing incorporate supportive services such as individual case management, mental health treatment, addiction therapy and vocational training.

Hotels and motels present a unique opportunity to utilize existing structures to respond to immediate housing need. These buildings are structurally similar to residential buildings, and have the potential to be quickly adapted to provide interim housing through publicly-funded programs. Today, individual rooms in motels are often used as a form of transitional housing, and there is increasing interest in converting entire properties to transitional housing and/or supportive

housing so that supportive services can be better integrated on-site. Measure H, a County-wide measure adopted in March 2017, has expanded the availability of funding to provide rental assistance and supportive services to residents of supportive and transitional housing. County-funded programs will help facilitate the use of hotels and motels for supportive and transitional housing on an interim basis. Once properties are no longer participating in a program to provide supportive and transitional housing, they may be returned to their previous use.

The proposed ordinance was drafted to address many of the common barriers that a property may face when undergoing an interim re-use to supportive and/or transitional housing. When converting a motel to supportive housing, the project needs to conform both to building codes and underlying zoning. Transient uses such as hotels and motels are typically classified under the building code as an R1 occupancy group, for transient residential uses (occupied for periods of less than 30 days). When being converted to a non-transient residential use such as supportive housing and transitional housing, the property undergoes a change in use to the building code's R2 occupancy group classification. When this change of use is requested at the Department of Building and Safety (LADBS), the project is checked for zoning compliance. Often, due to their age, hotels and motels are not in conformance with current zoning regulations, so this change of use can trigger additional complications.

Motels are most likely to take advantage of the draft ordinance. According to 2016 LA County Assessor data, there are approximately 10,259 guest rooms in at least 382 motels in the City of Los Angeles. It is uncertain precisely which of these motels would be identified as a potential Interim Motel Housing project. The majority of these motels (83%) are smaller properties with fewer than 50 rooms, and the average year built for all motels was 1944. When allowing for adaptive re-use of existing, aging properties, it is important to allow for a certain degree of flexibility in physical requirements. In recognition that each property is unique, the proposed ordinance was drafted to incorporate flexibility wherever possible, while ensuring that a set of minimum requirements are met.

### **3. Proposed Ordinance**

#### **Summary of Proposed Ordinance**

The proposed ordinance (Exhibit A) amends Sections 12.03, 14.00 and 151.02 of the Los Angeles Municipal Code (LAMC) to establish new regulations to allow existing hotels, motels, apartment hotels, transient occupancy residential structures and hostels to be used for an interim period as supportive housing and/or transitional housing. The proposed ordinance is designed to address any potential unnecessary barriers projects may encounter when participating in a program to provide supportive and transitional housing. Summarized below are the key provisions of the proposed ordinance.

#### **Definitions (LAMC Section 12.03)**

The following terms would be defined in the City's Zoning Code, reflecting existing definitions in state law:

- *Supportive Housing*, defined as housing for individuals, including homeless individuals, with low incomes and one or more disabilities, with the housing linked to on-site and off-site supportive services.
- *Transitional Housing*, defined as housing provided for a period of no more than 24 months, for individuals with low incomes and one or more disabilities, including homeless individuals, with the housing linked to on-site and off-site supportive services. It is designed to provide shelter and help stabilize individuals until they are able to move into a more permanent housing solution.
- *Supportive Services*, defined as services that are provided on a voluntary basis to residents of supportive housing and transitional housing, to assist the individual in obtaining and maintaining their housing.

#### Qualifying Projects and Application Process (LAMC Section 14.00 A.12(a) through (c))

The proposed amendments to LAMC Section 14.00 (the public benefit code provisions) would create an approval process through LADBS that would allow existing transient residential structures such as hotels, motels, apartment hotels, transient occupancy residential structures and hostels to conduct minor interior alterations and a temporary change of use to supportive housing and/or transitional housing. Provisions are included in this section to ensure that the temporary change in use will not result in any increase in floor area, building footprint, the number of units, or the overall building height. All units in a building must be converted to the supportive housing and/or transitional housing use to qualify as an Interim Motel Housing Project.

Prior to approval, projects must demonstrate that a contract is in place to provide supportive housing and/or transitional housing, and associated supportive services and rental assistance. Supportive services, including intensive case management, are required to be provided on-site, but some additional services may be provided off-site. The City anticipates that motels and hotels would maintain a contract to provide supportive housing and/or transitional housing for a minimum period of 5 to 15 years, though no minimum contract term is required in the draft ordinance (see *Discussion of Key Issues* for more information on supportive services contract requirements).

When the contract to provide supportive and/or transitional housing expires, buildings would be required to revert to their previous legal use, or any use allowed by the current zoning regulations.

Residential Hotels that are currently subject to the City's Residential Hotel Unit and Conversion Ordinance (RHO) in LAMC Section 47.70 et seq. are eligible to participate. All approvals or clearances concerning change in use and/or physical alterations (including any potential reduction in the number of Residential Hotel Units) will be handled by the Housing and Community Investment Department (HCIDLA) in accordance with the provisions of the RHO. Participation in the program will not lead to any increase in the number of Residential Hotel Units at the property once the contract term of the program has been completed.

#### Zoning Compliance and Performance Standards (LAMC Section 14.00 A.12(d) through (e))

Regardless of underlying zoning, qualified projects will be allowed to be used for supportive and/or transitional housing as long as a contract to provide supportive and/or transitional housing is maintained. Any existing buildings which are not in conformance with the current zoning – including density, parking, and use regulations – would be allowed to be used for this purpose without needing additional planning entitlements.

Projects would be eligible to make minor physical alterations to the interior of the existing structure, for example by adding kitchenettes to individual units or by converting existing floor area to supportive service and case management areas. Alterations may not result in the creation of additional floor area or units, or the expansion of the building footprint or height. Any physical alterations of this nature would be authorized to remain at the time that the building reverts to the previous use.

In recognition of the critical importance of on-site supportive services, projects must include dedicated case management space at a minimum ratio of one office for every twenty units or guest rooms. To ensure that supportive services are accessory to the supportive housing and/or transitional housing use, no more than 10% of the total floor area can be dedicated solely to supportive services.

#### Amendment to Rent Stabilization Ordinance (LAMC 151.02)

Existing policy exempts affordable housing units from the City's Rent Stabilization Ordinance (RSO). The proposed ordinance extends this exemption to Interim Motel Housing projects, which would be able to apply for an exemption from the RSO so long as a contract to provide supportive and/or transitional housing is maintained and adhered to. This exemption would only apply during the period that the contract is valid, and would not apply to any existing tenants in units currently subject to the RSO. Such tenants would be eligible for relocation assistance and/or maintain their protections under the RSO should they choose to remain in their units after the property is converted to supportive housing and/or transitional housing.

### **4. Discussion of Key Issues**

#### **Supportive Services Monitoring and Requirements**

Supportive services are an essential component of supportive housing and transitional housing, and are the key to these housing solutions working effectively to assist those experiencing homelessness in maintaining housing stability. For this reason, the proposed ordinance includes a requirement that all Interim Motel Housing Projects provide evidence demonstrating that supportive services will be provided. To ensure that the supportive services will not only be appropriate to the needs of the residents, but also provided at a sufficient staffing level, the applicant will be required to show that a local public agency, for example the LA County Department of Mental Health Services, has issued a commitment to fund those services. This allows the local public agency funding the project to review and determine the appropriate level of services. Such agencies oversee supportive services contracts with strict scrutiny, and are the

best entity to verify that an appropriate type and level of services are being provided. The Department of City Planning will maintain a list of local public agencies which would satisfy this requirement.

Based on comments received during the public comment period, a new requirement has been added to the draft ordinance pertaining to the provision of on-site supportive service areas. At a minimum, projects would be required to include dedicated office space that can accommodate intensive case management services, so that case managers have a location to provide private consultations with clients. Typical case loads are one case manager per twenty clients, and the new performance standard has been crafted to reflect this ratio. This requirement will ensure that intensive case management is provided on-site, in addition to other supportive services. In cases where physical constraints may limit the amount of additional services that may be provided on-site, the local public agency with oversight over the supportive services would vet the supportive services plan to ensure that the services are appropriately accessible to residents.

### **Cooking Facilities**

The draft ordinance includes provisions to allow the modification of guest rooms to install small cooking facilities, which is currently prohibited under existing regulations in buildings constructed after September 20, 1963. Guest rooms located in buildings constructed prior to 1963, defined as “Light Housekeeping Rooms,” may currently include small cooking facilities such as those identified in the draft ordinance.

While it is anticipated that the majority of Interim Motel Housing Projects would opt to install cooking facilities in individual units, in some cases the units may either be too small to accommodate the facilities, or there would be additional Building Code and Fire Code barriers which would make this modification infeasible. These properties may be better suited as transitional housing, which does not necessarily require individual kitchens because meals may be prepared in a central kitchen or otherwise arranged by the service provider. For these reasons, the ordinance does not require provision of cooking facilities in each unit.

### **Potential Impact on Housing Stock**

It is important to consider the potential impact of the proposed ordinance on the existing stock of motels in the City. Today, motels are sometimes used as an informal type of affordable housing – often called a “housing of last resort.” Individuals may utilize housing vouchers to rent out motel rooms on a temporary basis. However, these programs often do not include many of the tenant protections that are associated with a longer-term lease. The RSO does not extend protections to tenants who have “transient occupancy,” or stays of less than 30 days.

The proposed ordinance in many ways represents a continuation of this activity, but with some improvements. Residents would be permitted to remain in the unit, and would be provided the stability of a longer-term lease. Additionally, the quality and type of supportive services and property management provided to residents would be improved. Furthermore, the ordinance

allows for the interim re-use of these properties, and so there would be no permanent loss of existing units. Upon expiration of the contract to provide supportive services, the property would be required to revert back to the previous permitted use, with the ultimate goal that new, long-term affordable and supportive housing is constructed for the residents of the Interim Motel Housing Project.

## **5. Conclusion**

The proposed Interim Motel Conversion ordinance will create a pathway for existing buildings to be utilized for supportive housing and transitional housing, helping to promote creative, cost-effective, and expeditious strategies to expand housing solutions for persons experiencing homelessness. The new provisions would eliminate potential barriers that could disincentivize motel owners to participate in a motel conversion program.



## PUBLIC COMMUNICATIONS

### 1. Public Outreach and Public Comment Summary

The proposed Interim Motel Conversion ordinance was released on September 7, 2017 for a 53-day public comment period, which ended on October 30, 2017. During that period, the Department held five open house informational events in locations throughout the City, including: Downtown Los Angeles, West Los Angeles, San Pedro, South Los Angeles, and the San Fernando Valley. In total, the open house events were attended by approximately 108 members of the public.

#### **Public Hearings**

The Department held two staff public hearings on the matter: on September 25, 2017 at Van Nuys City Hall, and on September 28, 2017 at City Hall. The September 25th hearing attracted 66 attendees and 6 speakers, of which 5 were supportive of the ordinance. The September 28th hearing drew 62 attendees and 5 speakers, including 4 who were generally supportive with some recommended changes to improve the ordinance.

Comments raised during the public hearings were generally in line with the comments summarized below.

#### **Public Comment Letters Received**

During the public comment period, the Department received approximately 21 public comment letters, of which 11 were supportive of the ordinance, 8 made general comments and suggestions, and 2 had concerns or were opposed to the proposed ordinance. A summary of the comments received from each group are provided in italics below, each followed by the Department's response as appropriate.

#### Comments supportive of the draft ordinance

1. *The Interim Motel Conversion (IMC) ordinance seems to make a lot of sense, as motels are already established as high occupancy and transient living, and the ordinance would have minimal negative impact on neighborhoods. In fact, it may improve neighborhoods by facilitating redevelopment and improvement of existing buildings.*

No response necessary.

2. *The IMC ordinance would help to quickly and cost effectively create hundreds of units of transitional and supportive housing, which are critical to helping existing homeless people climb out of homelessness and in keeping new people from becoming homeless.*

No response necessary.

- 3. We have a need for supportive housing as well as transitional housing for those for whom being housed for one or two years will help them get back on their feet. Converting motels to transitional housing is a good way to serve the temporarily homeless.*

*No response necessary.*

- 4. Supportive Housing's supportive services are the key to ensuring that people with severe mental health, disability, or otherwise high barrier needs are able to maintain a healthy and sustainable life in their new home.*

*No response necessary.*

#### General comments and suggestions on the draft ordinance

- 1. There appears to be a discrepancy with regards to whether the Interim Motel Housing Projects may or would be required to revert back to their previous use upon termination of the contract.*

Section 14.00 A.12(c) of the draft ordinance states that upon expiration of a service contract to provide supportive and/or transitional housing the property owner "shall be required" to revert to their previous legal use, or any use allowed by the current zoning regulations. The ambiguity being referenced refers to enabling language in Section 14.00 A.12(d)(3) that also allows the use to revert, regardless of any nonconforming zoning issues or other underlying zoning restrictions that might prevent the return to the initial use.

- 2. Has the Department conducted a survey which reflects the number of units which qualify?*

The Department provided information on the total number of motels and motel rooms in the City of Los Angeles on pg. A-2 of this report. It is difficult to assess how many motels may qualify and be interested in participating the program.

- 3. The ordinance should include language and measures to prevent people from coming from out of the Los Angeles area to take advantage of this housing which is being subsidized for the residents of Los Angeles.*

There are complicated legal issues around policies that explicitly exclude people from residing in housing. Tenant selection is best handled by the service providers and property owners in conformance with fair housing law. In addition, most supportive housing receiving funding from local government will be required to utilize the Coordinated Entry System to refer individuals/families to a unit or resource that meets their needs and for which they are eligible. The Coordinated Entry System is a tool to coordinate efforts among all service providers and outreach teams in the County, allowing for centralized intake and assessments of all individuals and families experiencing homelessness in our communities.

4. *The ordinance should require motels to be at least 1,000 feet from any marijuana dispensary or liquor store.*

State Law under SB 2 limits the ability of jurisdictions to place additional requirements on the development of supportive housing and transitional housing that do not apply to other residential uses in the same zone, including siting requirements. A siting requirement of this nature would be contrary to the intent of State Law. Additionally, the City Council has introduced a motion that would include a distancing requirement for new commercial cannabis locations from supportive housing sites (Council File No. [14-0366-S4](#)).

5. *Residents should be required to participate in case management at least for a minimum length of time.*

The draft ordinance requires that conversion projects demonstrate that a contract is in place to provide supportive services. However, in line with the core “housing first” principle of supportive housing, participation in specific service activities is left optional. Housing first is a philosophy that homelessness can be most efficiently ended by providing someone with access to safe, decent and affordable housing. Although an individual experiencing homelessness may benefit from supportive services such as mental health or substance abuse counseling, participation in these services is not a prerequisite to access housing or a condition of maintaining it. Research has shown that even when participation in services is not required as a condition of tenancy in supportive housing, tenants still participate at high rates (Corporation for Supportive Housing, [Are Housing First Models Effective?](#)). This also ensures that supportive housing tenants are not subject to conditions of tenancy that exceed the normal conditions under which any leaseholder would be subject, including participation in treatment or other services.

6. *The ordinance should designate the Housing and Community Investment Department, or its successor, to monitor both the housing itself and the provision of services.*

To the extent the City is involved in funding any conversion projects, the Housing and Community Investment Department (HCIDLA) will be involved in monitoring of the housing for adherence to any funding requirements. HCIDLA is also involved in monitoring provisions of the Rent Stabilization Ordinance, the Residential Hotel and Conversion Ordinance as well as general code enforcement for multifamily buildings. Services are normally provided through the County agencies, which will be responsible for monitoring them.

7. *The ordinance should encourage contractors to provide a van or ride sharing vehicles.*

The proposed ordinance addresses land use regulations that relate to the use of certain structures for housing. As described, the public agencies which are providing funding for supportive services are the most appropriate entities to evaluate the types of supportive services offered to residents, and to require a service of this nature.

8. *Supportive services should serve a variety of resident needs, including trauma support for survivors of violent crimes. Not all homeless individuals have the same needs, and services should be tailored.*

To the extent possible, the supportive services available in a project should be customized with the needs of the tenants in mind. The draft ordinance is premised upon the understanding that the local public agency funding the project is in the best position to review and determine the appropriate level of services for each individual project.

9. *The ordinance should include a mechanism for releasing the covenant if the City determines that it is in their best interest to do so.*

A public agency funding the contract is normally able to terminate a contract if the project does not adhere to the contract terms.

10. *The ordinance should include standards for the exterior to make sure it is not an eyesore.*

Motel conversion projects that have occurred in the City thus far have included exterior renovations. However, not all existing buildings may require renovations, or have funding available for such work. It is also difficult to prescribe specific exterior design standards on existing buildings.

11. *The ordinance should require that the building be retrofitted for earthquake safety.*

Current regulations in the Building Code govern requirements for earthquake retrofitting of existing structures.

12. *If residents are not working and are physically able, they should be required to do a certain level of community service. This model has worked very well with recovering alcoholics at Beacon House in San Pedro.*

See response to comment 5, above. Participation in community service is not a prerequisite to access housing or a condition of maintaining it.

13. *The ordinance should clarify tenant rights for two groups of people: existing tenants in motels being converted, and tenants who move into new transitional or supportive housing created by the ordinance. The motel owner should be forbidden from evicting residents for the purpose of qualifying for this program, thus creating additional homeless. Furthermore, the ordinance should require the contractor to provide existing residents with the same services as new residents with the same goal of facilitating movement to permanent housing.*

When a tenant has been living in a hotel or motel as their primary residence for any period more than 30 days, the Rent Stabilization Ordinance (RSO) states that the accommodation shall

become a rental unit subject to the provisions of the RSO. This ordinance does not change those provisions.

*14. The Interim Motel Conversion Ordinance and the PSH Ordinance are part of the same 'project' and cannot be legally reviewed separately via different environmental clearance documents under the California Environmental Quality Act.*

The two proposed ordinances referenced here are completely independent projects and are not dependent on each other. The information sessions and public hearings for both were held on the same day and venue to facilitate public participation because they both relate to the provision of supportive housing. Allowing interested parties to attend two hearings on the same date was intended to increase public participation. However, the actual public hearings were held separately from each other at the same venues. Each of the ordinances are recommended and are being pursued independently even if one of them does not go forward. Approval of one ordinance does not impact consideration of the other.

#### Comments with concerns or opposition to the draft ordinance

*1. The Motel Conversion Ordinance has the potential to disproportionately impact some communities more than others. The ordinance should contain wording that bids the city to take neighborhood impact into account, obtains the support of the local councilmember before each conversion is approved, and provides a process for revocation of an individual's motel land use conversion should its changeover result in increased crime, sanitation or other deleterious problems. Using each Community Plan, there should be a percent of conversions that would not exceed any other Community Plan within the City.*

Requiring conversion projects to obtain the approval of one particular Councilmember is not a framework that has been used for any other type of land use approval. The City's current Administrative Nuisance Abatement process in LAMC 12.27.1 is the appropriate mechanism to allow for the modification, discontinuance or revocation of any land use approval, including Interim Motel Housing Projects. The section allows for revocations of approvals if the use has created a public nuisance or adversely affects the public health, peace, or safety of persons residing or working on the premises or in the surrounding area, among other criteria.

# FINDINGS

## 1. General Plan/Charter Findings

### **City Charter Section 556 and 558**

Pursuant to City Charter Sections 556 and 558, as described below, the proposed ordinance is in substantial conformance with the purpose, intent and provisions of the General Plan, as well as in conformance with the public necessity, convenience, general welfare and good zoning practice. Specifically, the action addresses each of the following goals, objectives and policies of the General Plan as outlined below.

### **General Plan Findings**

#### General Plan Framework Element

The proposed Interim Motel Conversion ordinance will meet the intent and purposes of the General Plan Framework Element to encourage the creation of housing opportunities for households of all types and incomes, while at the same time promoting livable neighborhoods. In particular, the proposed Interim Motel Conversion ordinance would further the intent and purpose of the following relevant goals, objectives, and policies of the Framework Element:

*Goal 4A: An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.*

*Policy 4.1.8: Create incentives and reduce regulatory barriers in appropriate locations in order to promote the adaptive re-use of structures for housing and rehabilitation of existing units.*

#### Housing Element

The proposed Interim Motel Conversion Ordinance is in substantial conformance with the purpose, intent and provisions of the General Plan in that it would further accomplish the goals, objectives and policies of the Housing Element outlined below:

*Goal 1: A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy and affordable to people of all income levels, races, ages, and suitable for their various needs.*

*Objective 1.1: Produce an adequate supply of rental and ownership housing in order to meet current and projected needs.*

*Policy 1.1.2: Expand affordable rental housing for all income groups that need assistance.*

*Policy 1.1.3: Facilitate new construction and preservation of a range of different housing types that address the particular needs of the city's households.*

*Objective 1.4: Reduce regulatory and procedural barriers to the production and preservation of housing at all income levels and needs.*

*Policy 1.4.1: Streamline the land use entitlement, environmental review, and building permit processes, while maintaining incentives to create and preserve affordable housing.*

*Goal 2: A City in which housing helps to create safe, livable and sustainable neighborhoods.*

*Objective 2.5: Promote a more equitable distribution of affordable housing opportunities throughout the City.*

*Policy 2.5.2: Foster the development of new affordable housing units citywide and within each Community Plan area.*

*Goal 4: A City committed to preventing and ending homelessness.*

*Objective 4.1: Provide an adequate supply of short-term and permanent housing and services throughout the City that are appropriate and meet the specific needs of all persons who are homeless or at risk of homelessness.*

*Policy 4.1.3: Provide permanent supportive housing options with services for homeless persons and persons/families at risk of homelessness to ensure that they remain housed and get the individualized help they need.*

*Policy 4.1.6: Provide housing facilities and supportive services for the homeless and special needs populations throughout the City, and reduce zoning and other regulatory barriers to their placement and operation in appropriate locations.*

As made evident by the list of General Plan goals, objectives and policies above, the proposed ordinance is in conformance with a range of General Plan goals related to the provision of permanent and transitional housing and services for persons experiencing homelessness. The City's General Plan clearly recognizes the need for programs which remove regulatory barriers to allow for the conversion of existing structures to affordable housing for persons experiencing homelessness. The proposed ordinance responds to the General Plan by providing a streamlined approval process to allow existing motels to be converted to short-term and permanent housing that is linked with supportive services in locations throughout the City.

## **2. CEQA Findings**

Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15301 (categorical exemption for existing facilities), the adoption of the proposed ordinance amending Los Angeles Municipal Code (LAMC) Sections 12.03, 14.00 and 151.02 of the Los Angeles Municipal Code

establishing regulations to facilitate the use of existing hotels and motels for Supportive Housing and/or Transitional Housing is categorically exempt from CEQA. Additionally, none of the exceptions to the categorical exemption identified in CEQA Guidelines Section 15300.2 apply, including, but not limited to, because the City expressly finds there is no unusual circumstance including one that could result in a potential significant impact to the environment. The proposed ordinance will have no direct or reasonably foreseeable indirect environmental impacts.

Additionally, approval of the project is supported by the Negative Declaration (ENV-2017-3410-ND) prepared for this project. As demonstrated in Exhibit B.2, the proposed Interim Motel Conversion Ordinance could not have a significant effect on the environment. An Environmental Impact Report is not required.

### **3. Urgency Clause Findings**

The City finds and declares that this ordinance is required for the immediate protection of the public peace, health, and safety for the following reasons: The Los Angeles Homeless Authority (LAHSA) January 2017 point in time count found that approximately 34,189 people are experiencing homelessness in the City of Los Angeles, reflecting a 20% increase from 2016. Over 73% of this number, or 25,237 people, are unsheltered, meaning that their primary nighttime residence is a public or private place not designated or ordinarily used as a regular sleeping accommodation for human beings. A significant portion of people experiencing homelessness in the City of Los Angeles experience multiple health issues, trauma, and disability: 20% have a substance use disorder, 33% have a serious mental illness, and 19% have a physical disability, while 36% have experienced domestic violence. Furthermore, approximately 31% of this population are experiencing chronic homelessness, a group that, when unsheltered, often incurs significant public costs related to emergency room visits, law enforcement, and incarceration. These costs have been shown to be significantly reduced when individuals are placed into supportive housing.

The process in the proposed ordinance is designed to promote the expeditious expansion of the availability of supportive housing and transitional housing within the City. Supportive housing and transitional housing provide stable shelter for individuals experiencing homelessness, along with supportive services which help to address health and disability issues such as substance abuse, serious mental illness, and physical disabilities.

For all these reasons, the ordinance allowing Interim Use of Motels for Supportive Housing or Transitional Housing shall become effective upon publication pursuant to Section 253 of the Los Angeles City Charter.



**EXHIBIT A:**  
**Proposed Interim Motel Conversion Ordinance**

CPC-2017-3409-CA  
December 14, 2017

ORDINANCE NO. \_\_\_\_\_

An ordinance amending Sections 12.03, 14.00 and 151.02 of the Los Angeles Municipal Code establishing regulations to facilitate the use of existing hotels and motels for Supportive Housing and/or Transitional Housing.

**WHEREAS**, the extreme shortage of housing in the City of Los Angeles has been well documented;

**WHEREAS**, the housing shortage continues to exacerbate the homelessness crisis, as rates of homelessness increased 20% in the City of Los Angeles from 2016 to 2017;

**WHEREAS**, the City of Los Angeles has declared a shelter crisis under California Government Code Section 8698 based on a finding that a significant number of homeless people in Los Angeles are without the ability to obtain shelter, resulting in a threat to their health and safety;

**WHEREAS**, the City Council has determined that, to address this crisis, the public interest or necessity demands the improvement of real property to provide supportive housing and transitional housing for extremely low income or very low income individuals and families who are homeless or chronically homeless, which includes facilities from which assistance and services, such as mental health treatment, health care, drug and alcohol treatment, education and job training, may be provided;

**WHEREAS**, on January 7, 2016, the City of Los Angeles issued a Comprehensive Homeless Strategy Report, which identified more than 60 policy and funding recommendations in addressing homelessness;

**WHEREAS**, Strategy 7C identified in the Comprehensive Homeless Strategy Report directed the Housing and Community Investment Department and the Department of City Planning to identify opportunities for adaptive reuse of existing private properties in the City of Los Angeles that are capable of being converted to Transitional and Supportive Housing, with special focus on existing high-density structures such as hotels and motels;

**WHEREAS**, given limited resources and the extreme need for shelter, it is clear that creative, cost-effective strategies are needed to complement the City's plan to address the homeless crisis in the urgent, comprehensive and persistent manner it deserves; and

**WHEREAS**, the adaptive reuse of hotels and motels presents an opportunity for a cost-effective and expeditious strategy to expand the City's supply of Transitional and Supportive Housing;

**NOW, THEREFORE,**

**THE PEOPLE OF THE CITY OF LOS ANGELES**

**DO ORDAIN AS FOLLOWS:**

Section 1. The following definitions are added to Section 12.03 of the Los Angeles Municipal Code to read:

**SUPPORTIVE HOUSING.** Housing with no limit on length of stay that is occupied by persons with low incomes who have one or more disabilities and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people. The housing is linked to onsite or offsite Supportive Services, and any onsite Floor Area used for the delivery of Supportive Services shall be considered accessory to the residential use.

**TRANSITIONAL HOUSING.** A building that is designed to provide housing and Supportive Services to persons with low incomes who have one or more disabilities and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people, to facilitate movement to permanent housing, typically within 24 months.

**SUPPORTIVE SERVICES.** Services that are provided on a voluntary basis to residents of Supportive Housing and Transitional Housing, including, but not limited to, a combination of subsidized, permanent housing, intensive case management, medical and mental health care, substance abuse treatment, employment services, benefits advocacy, and other services or service referrals necessary to obtain and maintain housing.

Section 2. Subdivision 12 of Subsection A of Section 14.00 of the Los Angeles Municipal Code is added to read as follows:

**12. Interim Use of Motels for Supportive Housing or Transitional Housing.** The purpose of this subdivision is to facilitate the interim use of dwelling units or guest rooms in existing Hotels, Motels, Apartment Hotels, Transient Occupancy Residential Structures and Hostels as Supportive Housing and/or Transitional Housing. This subdivision is further intended to allow such property to return to its previous use, or any use consistent with the underlying zoning, upon termination of the interim Supportive Housing and/or Transitional Housing use.

(a) **Interim Motel Housing Project.** An Interim Motel Housing Project is the physical re-purposing or adaptation of an existing Hotel, Motel, Apartment Hotel, Transient Occupancy Residential Structure, or Hostel for the purposes of using such building or buildings for Supportive Housing and/or Transitional Housing. All dwelling units and guest rooms in the project must be used for Supportive Housing and/or Transitional Housing. The Interim Motel Housing Project may not at any point in time result in any additional Floor Area or an expansion of the building footprint or height, nor shall it result in an increase in the total combined number of dwelling units or guest rooms on the property. Any Floor Area used for onsite Supportive Services shall be considered accessory to the residential use.

(1) For the purposes of this Section, properties and/or units that are subject to the provisions of LAMC Section 47.70, et seq. (Residential Hotel Ordinance) at the time that an Interim Motel Housing Project application is submitted to the Department of City Planning, shall remain subject to all

requirements and restrictions set forth therein both during the contract term to provide Supportive Housing and/or Transitional Housing and thereafter, including, but not limited to, the submission of an Application for Clearance to the Housing and Community Investment Department (HCID). At the conclusion of the contract term, the number of Residential Units at each participating property shall be no greater or less than the number originally determined by HCID pursuant to LAMC Section 47.76 or any subsequent number approved by HCID as part of an Application for Clearance.

**(b) Application and Approval.**

- (1) The Department of Building and Safety shall review all Interim Motel Housing Projects for zoning compliance described in Paragraph (d) and adherence to the performance standards in Paragraph (e). The Interim Motel Housing Project shall be approved if the application requirements, zoning compliance and performance standards of this subsection are met.
- (2) Prior to issuance of a building permit, the applicant shall provide a copy of an executed contract agreement which demonstrates that the Supportive Housing and/or Transitional Housing use to be provided on-site and associated Supportive Services have received funding from a local public agency, as identified on a list maintained by the Department of City Planning, and is in place and ready to commence operation upon project occupancy.

**(c) Termination of Supportive Housing and/or Transitional Housing Contract.**

Upon any termination of the Supportive Housing and/or Transitional Housing contract, the Interim Motel Housing Project shall be required, within 90 days, to notify the Department of Building and Safety and to complete one of the following:

- (1) Submit an application to the Department of Building and Safety to return to the previous use for which a Certificate of Occupancy was valid at the time that the Interim Motel Housing Project application was submitted to the Department of City Planning, or to any use permitted by the current zoning regulations; or
- (2) Provide a copy of a new executed contract agreement in accordance with the requirements in Paragraph (b)(2).

**(d) Zoning Compliance.**

- (1) Interim Motel Housing Projects shall not be subject to any otherwise applicable zoning ordinance and/or specific plan or other overlay district regulations including but not limited to the following:
  - (i) **Minimum Area per Dwelling Unit or Guest Room.** A building, nonconforming as to the area regulations (density) of the underlying zone, may be used for an Interim Motel Housing Project, provided

that the conversion does not create any additional dwelling units or guest rooms.

- (ii) **Off-Street Automobile Parking.** The required number of parking spaces shall be the same as the number of spaces that existed on the site at the time that the Interim Motel Housing Project application was submitted to the Department of Building and Safety, and shall be maintained and not reduced. Interim Motel Housing Projects shall otherwise be exempt from the provisions of Section 12.21 A.4(m) of this Code.
  - (iii) **Use.** Notwithstanding the use provisions of the underlying zoning, an Interim Motel Housing Project shall be permitted.
  - (iv) **Change of Use.** For any change of use of a building or a portion of a building, Section 12.23 B.7 of this Code shall not apply to Interim Motel Housing Projects.
  - (v) **Nonconforming Use of Buildings in Manufacturing Zones.** Notwithstanding the regulations contained in Section 12.23 B.4 of this Code, an Interim Motel Housing Project shall be permitted in M Zones.
  - (vi) **Nonconforming Use in A and R Zones.** The regulations contained in Section 12.23B.2 of this Code shall not disqualify any existing motel from approval as an Interim Motel Housing Project or from returning to a motel use at the termination of the Supportive Housing and/or Transitional Housing contract.
- (2) **Supplementation of Guest Rooms.** For the purposes of this Section, Guest Rooms may be supplemented with cooking facilities including a sink, a refrigerator not exceeding 10 cubic feet, counter space not exceeding 10 square feet, and a hotplate or microwave. Any such supplementation of Guest Rooms shall be permitted to remain at the time that an Interim Motel Housing Project returns to the original use for which a Certificate of Occupancy was valid at the time of application.
- (3) **Preservation of Nonconforming Rights.** Upon termination of the Supportive Housing and/or Transitional Housing use, any building used for an Interim Motel Housing Project that is nonconforming as to area and/or use regulations or any other zoning code requirement or requirements shall be authorized to return to the original use and condition for which a Certificate of Occupancy was valid at the time of application, notwithstanding any physical alterations to the subject property. Any Floor Area used for Supportive Services may be returned to use as guest rooms

and/or dwelling units, or may be converted to accessory amenity spaces, so long as the total number of guest rooms and the total number of dwelling units do not exceed the number approved on the previous Certificate of Occupancy.

(e) **Performance Standards.** The Interim Motel Housing Project shall meet the following performance standards:

(1) **Supportive Service Area.** For every twenty (20) units or guest rooms, a minimum of one dedicated office space shall be provided for the provision of on-site Supportive Services, including case management. A minimum of one dedicated office space shall be provided for Interim Motel Housing Projects with fewer than twenty (20) total combined units or guest rooms. Any Floor Area dedicated to Supportive Services may be provided on-site within an existing building, but shall not exceed ten percent (10%) of the total Floor Area of the building.

(2) **Lighting.** Security night lighting shall be shielded so that the light source cannot be seen from adjacent residential properties.

(f) **Purpose.** The use of these guest rooms and dwelling units under this subdivision shall not be considered an increase in density or other change which requires any corresponding discretionary action. Floor Area dedicated to Supportive Services shall be accessory to the Supportive Housing and/or Transitional Housing use. Lighting on the site should be adequate to provide for public safety and should not spill out on adjoining residential uses.

Section 3. Section 151.02 of the Los Angeles Municipal Code is amended to read as follows:

**Rental Units.** ... The term shall not include:

13. Housing accommodations in Supportive Housing and/or Transitional Housing participating in an Interim Motel Housing Project pursuant to LAMC Section 14.00.A.13.

This exemption shall apply only to housing accommodations which have been issued a housing exemption by the Department indicating satisfaction of the following conditions:

(1) the subject housing accommodations are subject to and operating in accordance with a contract to provide Supportive Housing and/or Transitional Housing; and

- (2) any tenant remaining in the housing accommodations at the commencement of the contract term to provide Supportive Housing and/or Transitional Housing shall be afforded all rights and protections provided by this Article, including, but not limited to, LAMC Section 151.09A pertaining to the recovery of housing accommodations from any such tenant.

The Department shall have the authority to revoke an exemption issued pursuant to this Subdivision for failure to adhere to any of the conditions for an exemption set forth in this Subdivision.

This exemption shall be deemed automatically revoked upon termination of the contract term or failure to operate in accordance with the contract to provide Supportive Housing and/or Transitional Housing.

**Section 4. URGENCY CLAUSE.** The City finds and declares that this ordinance is required for the immediate protection of the public peace, health, and safety for the following reasons: The Los Angeles Homeless Authority (LAHSA) January 2017 point in time count found that approximately 34,189 people are experiencing homelessness in the City of Los Angeles, reflecting a 20% increase from 2016. Over 73% of this number, or 25,237 people, are unsheltered, meaning that their primary nighttime residence is a public or private place not designated or ordinarily used as a regular sleeping accommodation for human beings. A significant portion of people experiencing homelessness in the City of Los Angeles experience multiple health issues, trauma, and disability: 20% have a substance use disorder, 33% have a serious mental illness, and 19% have a physical disability, while 36% have experienced domestic violence. Furthermore, approximately 31% of this population are experiencing chronic homelessness, a group that, when unsheltered, often incurs significant public costs related to emergency room visits, law enforcement, and incarceration. These costs have been shown to be significantly reduced when individuals are placed into supportive housing. The process in the proposed ordinance is designed to promote the expeditious expansion of the availability of supportive housing and transitional housing within the City. Supportive housing and transitional housing provide stable shelter for individuals experiencing homelessness, along with supportive services which help to address health and disability issues such as substance abuse, serious mental illness, and physical disabilities. For all these reasons, the ordinance allowing Interim Use of Motels for Supportive Housing or Transitional Housing shall become effective upon publication pursuant to Section 253 of the Los Angeles City Charter.

**Section 5. SEVERABILITY.** If any portion, subsection, sentence, clause or phrase of this ordinance is for any reason held by a court of competent jurisdiction to be invalid, such a decision shall not affect the validity of the remaining portions of this ordinance. The City Council hereby declares that it would have passed this ordinance and each portion or subsection, sentence, clause and phrase herein, irrespective of the fact that any one or more portions, subsections, sentences, clauses or phrases be declared invalid.

**EXHIBIT B:**  
Environmental Clearance

**B1: Categorical Exemption (ENV-2017-4476-CE)**

CPC-2017-3409-CA  
December 14, 2017



## CEQA Compliance – Categorical Exemption

### **Interim Motel Conversion Ordinance**

**CPC-2017-3409-CA**

**ENV-2017-4476-CE**

### **Project Description**

An ordinance amending Sections 12.03, 14.00 and 151.02 of the Los Angeles Municipal Code establishing regulations to facilitate the use of existing hotels and motels for Supportive Housing and/or Transitional Housing. The ordinance will remove regulatory barriers to allow for the temporary re-use of existing structures for residential purposes.

### **CEQA Findings**

Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15301 (categorical exemption for existing facilities), the adoption of the proposed ordinance amending Los Angeles Municipal Code (LAMC) Sections 12.03, 14.00 and 151.02 of the Los Angeles Municipal Code establishing regulations to facilitate the use of existing hotels and motels for Supportive Housing and/or Transitional Housing is categorically exempt from CEQA. Additionally, none of the exceptions to the categorical exemption identified in CEQA Guidelines Section 15300.2 apply. The proposed ordinance will have no direct or reasonably foreseeable indirect environmental impacts.

### Summary of Proposed Project

The proposed amendment to LAMC Section 12.03 would formalize the definitions of Supportive Housing, Transitional Housing, and Supportive Services to reflect existing state law. The proposed amendments to LAMC Section 14.00 would change the approval process to allow existing residential structures such as Hotels, Motels, Apartment Hotels, Transient Occupancy Residential Structures and Hostels to conduct minor interior alterations and a temporary change of use to supportive housing and/or transitional housing. The supportive housing/transitional housing use is temporary, and is contingent upon the existence of a valid contract with a local public agency to provide that use; upon termination of any such contract, the Interim Motel Conversion Project would be required to revert to the previous legally existing use. Provisions are included in this section to ensure that the temporary change in use will not result in any increase in building footprint, the number of units, or the overall building height. The proposed amendments to LAMC Section 151.02 are largely technical in nature, as they would amend the City's Rent Stabilization Ordinance to include an exemption for such projects, which are operating under the protection of a contract to provide the supportive housing and/or transitional housing use.

### Current Environment

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 to 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)).

Potential sites for Interim Motel Housing Projects would be any legally existing Hotel, Motel, Apartment Hotel, Transient Occupancy Residential Structure and Hostel located in the City of Los Angeles. Individual project locations are not known; therefore, this document does not assume any specific sites for development.

Motels are most likely to take advantage of the draft ordinance. According to 2016 LA County Assessor data, there are approximately 10,259 guest rooms in at least 382 motels in the City of Los Angeles. The majority of these motels (83%) are smaller properties with fewer than 50 rooms, with the average motel in the City containing 26 rooms. The average year built for all motels was 1944. It is uncertain precisely which of these motels would be identified as a potential Interim Motel Housing project; however, the number of motels which participate in the IMC Ordinance is likely to be a small percentage of the overall stock of motels in the City. The interim conversion of motels to supportive housing and/or transitional housing is reliant in part on the availability of public funds to subsidize the cost of providing the associated supportive services and to provide rental subsidies. These resources are finite. While it is not known at this time how many motels are likely to participate, this constraint is likely to further limit the number of individual properties that are affected by the IMC Ordinance.

Motels which may be utilized for interim conversion to supportive housing and/or transitional housing are likely currently utilized as either a transient residential use or a non-transient residential use. In some cases, a motel may currently contain both uses. The distinction between these two uses is the duration of the length of stay of the occupant. Motels may be rented out nightly, weekly, or for a longer period. After conversion to supportive housing and/or transitional housing, the motel would be fully utilized as a non-transient residential use. Residents of supportive housing would maintain a traditional lease, while residents of transitional housing would typically stay for a period of approximately 6 to 24 months. This change would involve no substantial expansion or change of use. Generally, the intensity of use would actually be reduced with the switch to longer durations of stay.

#### Class 1 Exemption for Existing Facilities – CEQA Guidelines Section 15301

The CEQA Guidelines provide as follows:

*Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination. The types of "existing facilities" itemized below are not intended to be all-inclusive of the types of projects which might fall with Class 1. The key consideration is whether the project involves negligible or no expansion of an existing use. Examples include but are not limited to: (a) Interior or exterior alterations involving such things as interior partitions, plumbing, and electrical conveyances; ,,, (d) Restoration or rehabilitation of deteriorated or damaged structures, facilities, or mechanical equipment to meet current standards of public health and safety ... (e) Additions to existing structures provided that the addition*

*will not result in an increase of more than: (1) 50 percent of the floor area of the structures before the addition, or 2,500 square feet, whichever is less; or (2) 10,000 square feet if: (A) The project is in an area where all public services and facilities are available to allow for maximum development permissible in the General Plan and (B) The area in which the project is located is not environmentally sensitive...*

A project qualifies for a Class 1 Categorical Exemption if it involves negligible or no expansion of an existing structure, facility or use, including small interior alterations to existing structures. No new major construction is anticipated as a result of the ordinance, nor does the ordinance create any permanent change to density or permitted uses. The most likely scenario is a potential for increased re-use of existing facilities including interior or exterior alterations involving such things as interior partitions, installation of cooking facilities (i.e. countertop, hotplate, sink, and a small refrigerator) within individual units, plumbing and electrical upgrades, new fire-safety provisions, and minor façade improvements, all of which would be considered a minor alteration to existing structures or facilities and would be exempt under CEQA Guidelines Section 15301. Additionally, as discussed, there is no reason to anticipate that an Interim Motel Conversion Project operated as a result of the proposed ordinance would lead to any expansion of use beyond the existing use. Such projects are required to be located within a legally existing hotel, motel, apartment hotel, transient occupancy residential structure or hostel, all of which would be currently utilized for a transient or non-transient residential use. The proposed ordinance does not allow for any increase of the number of dwelling units or guest rooms on the site of potential project or increase of any floor area, and so there would not be any increase in the intensity of the residential use of the existing structures.

#### Exceptions – CEQA Guidelines Section 15300.2

There is no evidence in the record which demonstrates that any of the five (5) applicable exceptions from CEQA Guidelines Section 15300.2 apply to the proposed ordinance: (b) Cumulative Impact; (c) Significant Effect; (d) Scenic Highways; (e) Hazardous Waste Sites; and (f) Historical Resources.<sup>1</sup>

*(b) Cumulative Impact:* Interim Motel Conversion Projects are required to be located within a legally existing hotel, motel, apartment hotel, transient occupancy residential structure or hostel and may not be developed through new construction. Additionally, operation of Interim Motel Conversion Projects are generally dependent on the availability of public funding to subsidize the cost of providing the supportive and/or transitional housing use, and as such are not expected to occur in large numbers throughout the City. Any Interim Motel Conversion Projects operated as a result of the proposed ordinance would be temporary in nature. The temporary conversion of hotel/motel use to supportive or transitional housing is not anticipated to result in cumulative adverse environmental impacts because it would involve little to no construction and would involve negligible to no expansion of an existing use – i.e., converting one type of residential use to another. The location and number of properties that would use this ordinance is unknown and would be speculative to identify. To the extent that the IMCO would be used by currently

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<sup>1</sup> Per the CEQA Guidelines, the location exception in CEQA Guidelines Section 15300.2(a) does not apply to Class 1 categorical exemptions.

underused properties, the IMCO could result in increased occupancy; however, this is not anticipated to result in a cumulatively significant increase in trips (and associated impacts) from the hotel/motel conversions, because the target population of the IMCO is largely transit-dependent. Since the IMCO would not increase the number of units, the infrastructure serving the properties would already be present and sized for the facilities.

Thus, there is no reason to believe that the proposed ordinance would result in a cumulative impact of a succession of projects of the same type and in the same place, and this exception does not apply.

*(c) Significant Effect:* As discussed, the proposed ordinance restricts the location of Interim Motel Conversion Projects, allows for a temporary change of use, and does not allow for any increase in the existing building footprint, the number of units, or the building height. Thus, there are no unusual circumstances created as a result of this ordinance which may lead to a significant effect on the environment. Additionally, there is no basis to find the proposed ordinance will result in an unusual circumstance.

*(d) Scenic Highways:* Currently, the only portion of a scenic highway officially designated by the California Department of Transportation (Caltrans) in Los Angeles County is the 2 Freeway near La Canada-Flintridge. Within the City of Los Angeles, a six-mile portion of the Pasadena Freeway (also known as the Arroyo Seco Historic Parkway) from milepost 25.7 to 31.9 is designated as a Historic Parkway and other portions of freeways are considered eligible but not officially designated including 2.5 miles of Topanga Canyon State Scenic Highway (State Route 27).

The ordinance does not allow for the physical construction of new structures or facilities, or for the physical expansion of existing structures or facilities, and as such there is no possibility that an Interim Motel Conversion Project created or operated as a result of this ordinance would have any impact on any scenic resources within the Historic Parkway of the Pasadena Freeway or the eligible but not designated portion of Topanga Canyon State Scenic Highway.

*(e) Hazardous Waste Sites:* There is no reason to believe that an Interim Motel Conversion Project would be located in a Hazardous Waste Site, as the ordinance requires that the project be operated within a legally existing hotel, motel, apartment hotel, transient occupancy residential structure or hostel and this condition would have been verified upon construction of the pre-existing structure.

*(f) Historical Resources:* There is no basis to find that the proposed ordinance may cause a substantial adverse change in the significance of a historical resource. Projects are expected to have little to no exterior renovations and minor non-structural renovations to the interior. Any national, state or local designated properties would require prior review and approval for any building permit from the City's Office of Historic Resources and potentially the City's Cultural Heritage Commission. As such, the proposed ordinance will not result in a substantial adverse change to the significance of a historic resource and this exception does not apply.

Conclusion

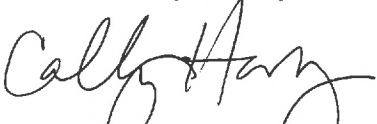
On the basis of the whole of the record before the lead agency including any comments received, the lead agency finds that there is no substantial evidence that the proposed project will have a significant effect on the environment. The analysis reflects the lead agency's independent judgment and analysis.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

**EXHIBIT B:**  
Environmental Clearance

**B2: Negative Declaration (ENV-2017-3410-ND)**

CPC-2017-3409-CA  
December 14, 2017

**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> Interim Motel Conversion (IMC) Ordinance	<b>ENVIRONMENTAL CASE NO:</b> ENV-2017-3410-ND	
<b>PROJECT LOCATION:</b> Citywide zoning ordinance affecting all legally existing Hotels, Motels, Apartment Hotels, Transient Occupancy Residential Structures and Hostels located in the City of Los Angeles.		
<b>PROJECT DESCRIPTION:</b> <p>The Proposed Interim Motel Conversion (IMC) Project is an ordinance (IMC Ordinance) that would amend Sections 12.03, 14.00 and 151.02 of the City of Los Angeles Municipal Code (LAMC) to establish regulations to facilitate the use of existing hotels and motels for Supportive Housing and/or Transitional Housing. The ordinance will remove regulatory barriers to allow for the temporary re-use of existing structures for residential purposes.</p> <p>The proposed amendment to LAMC Section 12.03 would formalize the definitions of Supportive Housing, Transitional Housing, and Supportive Services to reflect existing state law. The proposed amendments to LAMC Section 14.00 would change the approval process to allow existing residential structures such as Hotels, Motels, Apartment Hotels, Transient Occupancy Residential Structures and Hostels to conduct minor interior alterations and a temporary change of use to supportive housing and/or transitional housing. The supportive housing/transitional housing use is temporary, and is contingent upon the existence of a valid contract with a local public agency to provide that use; upon termination of any such contract, the Interim Motel Conversion Project would be required to revert to the previous legally existing use. Provisions are included in this section to ensure that the temporary change in use will not result in any increase in building footprint, the number of units, or the overall building height. The proposed amendments to LAMC Section 151.02 would amend the City's Rent Stabilization Ordinance to include an exemption for such projects, which are operating under the protection of a contract to provide the supportive housing and/or transitional housing use.</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 278 Los Angeles, CA 90012	<b>SIGNATURE (Official)</b> 	<b>DATE:</b> 11/27/2017

<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> November 6, 2017	
<b>RESPONSIBLE AGENCY:</b> Department of City Planning					
<b>ENVIRONMENTAL CASE:</b> ENV-2017-3410-ND					
<b>PROJECT DESCRIPTION:</b> <p>The Proposed Interim Motel Conversion (IMC) Project is an ordinance (IMC Ordinance) that would amend Sections 12.03, 14.00 and 151.02 of the City of Los Angeles Municipal Code (LAMC) to establish regulations to facilitate the use of existing hotels and motels for Supportive Housing and/or Transitional Housing. The ordinance will remove regulatory barriers to allow for the temporary re-use of existing structures for residential purposes.</p> <p>The proposed amendment to LAMC Section 12.03 would formalize the definitions of Supportive Housing, Transitional Housing, and Supportive Services to reflect existing state law. The proposed amendments to LAMC Section 14.00 would change the approval process to allow existing residential structures such as Hotels, Motels, Apartment Hotels, Transient Occupancy Residential Structures and Hostels to conduct minor interior alterations and a temporary change of use to supportive housing and/or transitional housing. The supportive housing/transitional housing use is temporary, and is contingent upon the existence of a valid contract with a local public agency to provide that use; upon termination of any such contract, the Interim Motel Conversion Project would be required to revert to the previous legally existing use. Provisions are included in this section to ensure that the temporary change in use will not result in any increase in building footprint, the number of units, or the overall building height. The proposed amendments to LAMC Section 151.02 would amend the City’s Rent Stabilization Ordinance to include an exemption for such projects, which are operating under the protection of a contract to provide the supportive housing and/or transitional housing use.</p>					
<b>ENVIRONMENTAL SETTING:</b> Citywide zoning ordinance affecting all legally existing Hotels, Motels, Apartment Hotels, Transient Occupancy Residential Structures and Hostels located in the City of Los Angeles.					
<b>PROJECT LOCATION:</b> The City of Los Angeles					
<b>COMMUNITY PLAN AREA:</b> All		<input checked="" type="checkbox"/> Does Conform to Plan		<b>AREA PLANNING COMMISSION:</b> All	
<b>STATUS:</b> <input type="checkbox"/> Preliminary <input type="checkbox"/> Proposed <input checked="" type="checkbox"/> ADOPTED,		<input type="checkbox"/> Does NOT Conform to Plan		<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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 <b>Signature</b>	<u>Planning Assistant</u> <b>Title</b>	<u>213-978-1643</u> <b>Phone</b>
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## 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 278 Los Angeles, CA 90012	
<b>AGENCY REQUIRING CHECKLIST:</b> City of Los Angeles Department of City Planning	<b>DATE:</b> November 6, 2017
<b>PROPOSAL NAME (If Applicable):</b> Interim Motel Conversion 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>
b.	EXPOSURE OF PEOPLE TO OR GENERATION OF EXCESSIVE GROUND BORNE VIBRATION OR GROUND BORNE 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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>
e.	FOR A PROJECT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT, WOULD THE PROJECT 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 278.

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> November 6, 2017
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## ENVIRONMENTAL IMPACT ANALYSIS

### INTRODUCTION

Below is a discussion of the potential impacts in each environmental topic area. In most cases, topic areas are not impacted at all. Those that are have been found to be less than significant without mitigation.

This evaluation is a review of the impact of the proposed Interim Motel Conversion Ordinance on the re-use of existing structures for a similar use, as well as on development patterns and behavior throughout the City of Los Angeles.

### PROJECT DESCRIPTION

The Proposed Interim Motel Conversion (IMC) Project is an ordinance (IMC Ordinance) that would amend Sections 12.03, 14.00 and 151.02 of the City of Los Angeles Municipal Code (LAMC) to establish regulations to facilitate the use of existing hotels and motels for Supportive Housing and/or Transitional Housing. The ordinance will remove regulatory barriers to allow for the temporary re-use of existing structures for non-transient residential purposes.

The proposed amendment to LAMC Section 12.03 would formalize the definitions of Supportive Housing, Transitional Housing, and Supportive Services to reflect existing state law. The proposed amendments to LAMC Section 14.00 would change the approval process to allow existing residential structures such as Hotels, Motels, Apartment Hotels, Transient Occupancy Residential Structures and Hostels to conduct minor interior alterations and a temporary change of use to supportive housing and/or transitional housing. The supportive housing/transitional housing use is temporary, and is contingent upon the existence of a valid contract with a local public agency to provide that use; upon termination of any such contract, the Interim Motel Conversion Project would be required to revert to the previous legally existing use. Provisions are included in this section to ensure that the temporary change in use will not result in any increase in building footprint, the number of units, or the overall building height. The proposed amendments to LAMC Section 151.02 would amend the City's Rent Stabilization Ordinance to include an exemption for such projects, which are operating under the protection of a contract to provide the supportive housing and/or transitional housing use.

Potential sites for Interim Motel Housing Projects would be any legally existing Hotel, Motel, Apartment Hotel, Transient Occupancy Residential Structure and Hostel located in the City of Los Angeles. Individual project locations are not known; therefore, this document does not assume any specific sites for development.

Motels are most likely to take advantage of the draft ordinance. According to 2016 LA County Assessor data, there are approximately 10,259 guest rooms in at least 382 motels in the City of

Los Angeles. The majority of these motels (83%) are smaller properties with fewer than 50 rooms, with the average motel in the City containing 26 rooms. The average year built for all motels was 1944. It is uncertain precisely which of these motels would be identified as a potential Interim Motel Housing project; however, the number of motels which participate in the IMC Ordinance is likely to be a small percentage of the overall stock of motels in the City. The interim conversion of motels to supportive housing and/or transitional housing is reliant in part on the availability of public funds to subsidize the cost of providing the associated supportive services and to provide rental subsidies. These resources are finite. While it is not known at this time how many motels are likely to participate, this constraint is likely to further limit the number of individual properties that are affected by the IMC Ordinance.

Motels which may be utilized for interim conversion to supportive housing and/or transitional housing are likely currently utilized as either a transient residential use or a non-transient residential use. In some cases, a motel may currently contain both uses. The distinction between these two uses is the duration of the length of stay of the occupant. Motels may be rented out nightly, weekly, or for a longer period. After conversion to supportive housing and/or transitional housing, the motel would be fully utilized as a non-transient residential use. Residents of supportive housing would maintain a traditional lease, while residents of transitional housing would typically stay for a period of approximately 6 to 24 months. This change would involve no substantial expansion or change of use. Generally, the intensity of use would actually be reduced with the switch to longer durations of stay.

## **DISCRETIONARY ACTIONS AND APPROVALS**

The following actions by the City of Los Angeles will be required in order to implement the IMC Ordinance:

- Adoption of this Interim Motel Conversion Ordinance environmental document, and
- Adoption of the proposed ordinance to amend the City's Municipal Code.

## **IMPACT ANALYSIS**

### **1. Aesthetics**

**Would the project:**

- a. Have a substantial adverse effect on a scenic vista?**
- b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**
- c. Substantially degrade the existing visual character or quality of the site and its surroundings?**
- d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

### **No Impact**

The IMC Ordinance would have no impact on the physical size, shape or aesthetics of existing structures, as it does not authorize any physical modifications which would result in any expansion of building footprint, floor area, or building height. Furthermore, as no new construction is specifically proposed in this ordinance, there will be no impact to scenic vistas, scenic resources, visual character or quality, or light quality. As the Proposed Ordinance does not allow any expansion of existing buildings – no new square footage, dwelling units, floor area-- there will be no change in the baseline conditions from the project related to aesthetics. To the extent that future applicants provide minor renovations to the façade these would be expected to be a beneficial aesthetic impact to improve and upgrade current conditions. Based on the above there are no impacts from the project.

## **2. Agriculture and Forestry Resources**

**Would the project:**

- a. **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**
- b. **Conflict with existing zoning for agricultural use, or a Williamson Act Contract?**
- c. **Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?**
- d. **Result in the loss of forest land or conversion of forest land to non-forest use?**
- e. **Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?**

**No Impact.**

It is not reasonably foreseeable that the IMC Ordinance would impact agriculture and forestry resources as they are so limited in the City. The IMC Ordinance does not propose or allow for any new construction, as it only includes limited regulations for the temporary re-use of existing structures located in urbanized areas. As a result, the amendment will not directly or indirectly result in the loss or conversion of any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. No loss of forest land or conversion of forest land to non-forest land will occur.

## **3. Air Quality**

**Would the project:**

- a. Conflict with or obstruct implementation of the applicable air quality plan?
- b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- c. 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)?
- d. Expose sensitive receptors to substantial pollutant concentrations?
- e. Create objectionable odors affecting a substantial number of people?

#### **No Impact.**

The IMC Ordinance will not obstruct the implementation of South Coast Air Quality Management District plans, nor will it violate any air quality standard or contribute substantially to an existing or projected air quality violation. The IMC Ordinance does not propose or allow for any new construction. As discussed, it only includes limited regulations for the temporary re-use of existing structures located in urbanized areas. As no new construction is proposed and no excavation would occur, the IMC Ordinance will not directly result in the cumulative net increase of any criteria pollutant, expose sensitive receptors to pollutants, or create objectionable odors. The Proposed Ordinance would establish housing for homeless persons already residing within the region, and would not induce new population growth. Individual projects would be expected to generate fewer vehicular trips than existing conditions and therefore would not have the potential to produce long-term air quality impacts in excess of current conditions. Peak hour trip generation for supportive housing is 0.12 trips per unit,<sup>1</sup> compared to 0.58 trips per unit for motels and 0.70 trips per unit for hotels.<sup>2</sup> The Proposed Ordinance would facilitate the conversion of existing structures to a specific type of residential use. According to the SCAQMD CEQA Air Quality Handbook, residential use is not a land use that is associated with odor complaints; therefore, the IMC Ordinance would not generate objectionable odors affecting a substantial number of people.

#### **4. Biological Resources**

##### **Would the project:**

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<sup>1</sup> Trip generation rates from Table 5 of the City of Los Angeles, Transportation Impact Study Guidelines, December 2016. Peak hour trip generation is 0.12 trips per unit for supportive housing; daily trip generation is 1.27 trips per day. For an average 50-unit motel conversion project, this would result in approximately  $1.27 \times 50 = 63.5$  total daily trips.

<sup>2</sup> Trip generation rates from the 8<sup>th</sup> Edition ITE Trip Generation Report. Peak hour trip generation is 0.58 trips per unit for motels and 0.70 trips per unit for hotels; daily trip generation is 9.11 trips per day for motels and 8.92 trips per day for hotels. For an average 50-unit motel, this would result in approximately  $9.11 \times 50 = 455.5$  total daily trips; for an average 50-unit hotel this would result in approximately  $8.92 \times 50 = 446$  total daily trips.

- a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
- 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?
- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

**No Impact.**

The IMC Ordinance does not propose or allow for any new construction, as it only includes limited regulations for the temporary re-use of existing structures located in urbanized areas. There is no change from baseline to future project conditions related to biological resources. No significant riparian habitat or other sensitive natural communities occur in existing urbanized areas where individual projects are likely to be located. Any potential construction activities which may occur (i.e. minor physical alterations to existing structures) would not foreseeably impact any special status species, protected habitats or habitats that can support special status species or any local policies or ordinances protecting biological resources. The City has a Protected Tree Ordinance. However, it is not foreseeable that future construction under the ordinance would impact protected trees under the City Ordinance. If it did, it would be subject to City permit review and would not be expected to violate the City Ordinance. Furthermore, there are no adopted Habitat Conservation Plans, or Natural Community Conservation Plans, or other approved habitat conservation plans in the City. As a result, the Proposed Ordinance will not directly impact state or federally listed species, riparian habitat, wetlands, sensitive natural communities, migratory fish or wildlife species, adopted Habitat Conservation Plan, Natural Community Plan, trees, or marine animals.

## **5. Cultural Resources**

**Would the project:**



- a. **Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?**

**Less Than Significant Impact.**

The IMC Ordinance does not propose or allow for any new construction, as discussed it only includes limited regulations for the temporary re-use of existing structures located in urbanized areas. Projects are expected to have little to no exterior renovations and minor non-structural renovations to the interior. Any renovations of structures involving national, state or local historical resource would be subject to the appropriate level of review with the City of Los Angeles Office of Historic Resources, and potentially the Historic Resources Commission, to ensure that any modifications comply with the Secretary of the Interior Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings (1995). Individual projects would not result in the demolition of existing historical resources, as no new construction or demolition would be authorized under the provisions of the IMC Ordinance. As a result, the Proposed Ordinance would have a less than significant impact on historical resources.

- b. **Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?**
- c. **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**
- d. **Disturb any human remains, including those interred outside of formal cemeteries?**

**No Impact.**

The IMC Ordinance does not propose or allow for any new construction, as discussed it only includes limited regulations for the temporary re-use of existing structures located in urbanized areas. Any construction activities which may occur as a result of the Proposed Ordinance (i.e. minor interior alterations to allow for installation of cooking facilities or minor façade renovations) would not involve any excavation or grading, and would have no impact on any previously unidentified archaeological resources, paleontological resources, unique geologic features, human remains or other cultural resources. No further analysis is necessary.

## **6. Geology and Soils**

**Would the project:**

- a. **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.
  - (ii) Strong seismic ground shaking?
  - (iii) Seismic-related ground failure, including liquefaction?
  - (iv) Landslides?
- b. Result in substantial soil erosion or the loss of topsoil?
  - c. Be located on a geologic unit 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?
  - d. Be located on expansive soil, as identified in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?
  - e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

**No Impact.**

In 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD)*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. However, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze the impact of that exacerbated condition on future residents and users of a project, as well as other impacted individuals.

As discussed, the IMC Ordinance does not allow for the development of new structures. The Proposed Ordinance only includes limited regulations for the temporary re-use of existing structures located in urbanized areas. Any construction activities which may occur as a result of the Proposed Ordinance (i.e. minor interior alterations to allow for installation of cooking facilities or minor façade renovations) would not exacerbate existing geologic conditions or hazards. Therefore, the Proposed Ordinance would have no impact related to seismic hazards, liquefaction, landslides, soil erosion, loss of topsoil, unstable geologic units, expansive soils, or wastewater disposal.

## **7. Greenhouse Gas Emissions**

**Would the project:**

- a. **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**
- b. **Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

#### **Less Than Significant Impact.**

As discussed throughout this document, the Proposed Ordinance would not lead to the construction of new structures. The IMC Ordinance would provide limited regulations to allow the temporary re-use of existing structures located in urbanized areas for a supportive housing and/or transitional housing use. Any potential construction activities that may occur would be minor in nature (i.e. minor interior alterations to allow for installation of cooking facilities in existing units), and are not anticipated to contribute any significant levels of construction-related GHG emissions.

The Proposed Ordinance is not anticipated to result in any significant increase in operational sources of GHG emissions from vehicles, water, energy, waste and area sources associated with daily use of the units. Motels which may be utilized for interim conversion to supportive housing and/or transitional housing are likely currently utilized as either a transient residential use or a non-transient residential use. After conversion to supportive housing and/or transitional housing, the motel would be fully utilized as a non-transient residential use, which would be expected to have similar or reduced emissions. Traffic from the converted motels are expected to decrease as a result of the Proposed Ordinance. In fact, as discussed, traffic volumes are likely to decrease with the re-use of existing hotels and motels for supportive and transitional housing. Peak hour trip generation for supportive housing is 0.12 trips per unit,<sup>3</sup> compared to 0.58 trips per unit for motels and 0.70 trips per unit for hotels.<sup>4</sup> Thus, any impacts related to GHG emissions generated by vehicular trips are anticipated to be reduced for projects affected by the IMC Ordinance.

Based on the expected number and type of individual projects which may occur as a result of the IMC Ordinance, including re-use of existing structures located in urbanized areas that is consistent with the Southern California Association of Governments' Regional Transportation Plan (RTP/SCS) that encourages increased density in urban environments such as the City, the amendment will not cause an increase in cumulative greenhouse gas emissions nor will it conflict with an applicable plan, policy, or regulation adopted for the

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<sup>3</sup> Trip generation rates from Table 5 of the City of Los Angeles, Transportation Impact Study Guidelines, December 2016. Peak hour trip generation is 0.12 trips per unit for supportive housing; daily trip generation is 1.27 trips per day. For an average 50-unit motel conversion project, this would result in approximately  $1.27 \times 50 = 63.5$  total daily trips.

<sup>4</sup> Trip generation rates from the 8<sup>th</sup> Edition ITE Trip Generation Report. Peak hour trip generation is 0.58 trips per unit for motels and 0.70 trips per unit for hotels; daily trip generation is 9.11 trips per day for motels and 8.92 trips per day for hotels. For an average 50-unit motel, this would result in approximately  $9.11 \times 50 = 455.5$  total daily trips; for an average 50-unit hotel this would result in approximately  $8.92 \times 50 = 446$  total daily trips.

purposes of reducing greenhouse gases. For these reasons, the IMC Ordinance would result in less than significant impacts related to GHG emissions.

## **8. Hazards and Hazardous Materials**

**Would the project:**

- a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**
- b. Create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**
- c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**
- d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**
- e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard 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 people residing or working in the project area?**
- g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**
- 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?**

**No Impact.**

The IMC Ordinance does not propose or allow for any new construction, as discussed it only includes limited regulations for the temporary re-use of existing structures located in urbanized areas. No excavation is anticipated to occur which could result in the release of hazardous materials into the environment. No physical construction is proposed as part of this code amendment, and as such it will not have any direct impact on the routine transport, use or disposal of hazardous materials. Future residents and users of converted motels are not expected to use hazardous materials other than typical small quantities of household hazards, such as cleaning agents, and these would not be expected to result in impacts over any existing from current uses and baseline conditions. Potential sites are not known at this time, but are not likely to be located in airport clear zones. The ordinance will not create any significant hazards through the release of hazardous materials nor interfere with any adopted emergency response or emergency evacuation plans. Indirect impacts related to hazards and hazardous materials are not foreseeable at this time from

the project. Baseline to future physical conditions from the project related to hazards are not expected to change.

## 9. Hydrology and Water Quality

Would the project:

- a. Violate any water quality standards or waste discharge requirements?
- b. 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)?
- 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?
- 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 a manner which would result in flooding on- or off-site?
- 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?
- f. Otherwise substantially degrade water quality?
- g. 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?
- h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?
- i. 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?
- j. Inundation by seiche, tsunami, or mudflow?

**No Impact.**

The IMC Ordinance does not propose or allow for any construction of new buildings or structures, or for any expansion of existing structures. Baseline to future physical conditions from the project related to hydrology are not expected to change. As discussed, the project includes limited regulations for the temporary re-use of existing structures located in urbanized areas and does not increase or intensify the use of the site, including on water use or drainage. The IMC Ordinance will not bear any direct impact on run-off, surface water body, groundwater supplies, hydrology, or water quality.

## 10. Land Use and Planning

### Would the project:

#### a. Physically divide an established community?

##### **No Impact.**

The IMC Ordinance is not a project that would result in a physical division of an existing community. Moreover, development in accordance with the IMC Ordinance would occur in the form of re-use of existing structures within urbanized areas; these relatively small projects would not have the potential to divide communities. This is not anticipated to result in land use conflicts because individual projects would be a continuation of an existing similar use. Therefore, development in accordance with the IMC Ordinance would not create a physical barrier to divide established communities. There would be no impacts related to dividing an established community.

#### b. 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?

##### **Less Than Significant Impact.**

The IMC Ordinance would be consistent with local land use plans, goals, and policies calling for re-use of existing structures for housing, in order to encourage more compact development. The IMC Ordinance would amend Sections 12.03, 14.00 and 151.02 of the LAMC to establish new regulations to allow existing hotels, motels, apartment hotels, transient occupancy residential structures and hostels to be used for an interim period as supportive housing and/or transitional housing. The IMC Ordinance would allow for these structures to undergo minor interior alterations and a temporary change of use. These changes would not result in conflicts with overlying policies that reduce impacts and ensure compatibility of land uses, and the regulations of any applicable overlay would still apply to individual projects. The IMC Ordinance is in substantial conformance with the purpose, intent and provisions of the General Plan, as well as in conformance with the public necessity, convenience, general welfare and good zoning practice. The IMC Ordinance meets the intent of the General Plan Framework Element to encourage the creation of an equitable distribution of housing opportunities for households of all types and incomes, as well as the stated policy to create incentives and reduce regulatory barriers in appropriate locations in order to promote the adaptive re-use of structures for housing. The IMC Ordinance would further accomplish the goals, objectives, policies and programs of the Housing Element of the General Plan by expanding the supply of supportive housing options throughout the City, and by reducing zoning and other

regulatory barriers to the placement and operation of supportive housing and supportive services in appropriate locations. Therefore, the IMC Ordinance would have less than significant impacts with respect to plan consistency.

**c. Conflict with any applicable habitat conservation plan or natural community conservation plan?**

**No Impact.**

The City has not adopted a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans that would be applicable to the IMC Ordinance. Therefore, implementation of the Proposed Ordinance would not conflict with the provisions of an adopted Habitat Conservation Plan.

## **11. Mineral Resources**

**Would the project:**

- a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**
- b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

**No Impact.**

The IMC Ordinance will have no effect on mineral resources locally or regionally, either in availability or future value. Development in accordance with the IMC Ordinance would occur through the re-use of existing structures within urbanized areas. It is not expected that any sites that are in use for mineral extraction would be utilized and there will be no change in baseline conditions from the project related to mineral resources. The IMC Ordinance requires that any project be the site of an existing hotel, motel, transient occupancy residential structure, or hostel, and these sites are not likely to be in use for mineral extraction. Therefore, the re-use of existing structures in accordance with the IMC Ordinance would have no impact on mineral resources and mineral resource recovery, and no loss or use of known mineral resources will occur.

## **12. Noise**

**Would the project result in:**

- a. 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?**

- b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?**
- c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**
- d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?**
- 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?**
- 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.**

The IMC Ordinance does not directly expose additional persons to, or generate, excess noise levels, as it does not directly generate new development. As discussed in this report, the IMC Ordinance is expected to result in the re-use of existing structures for housing but will not allow for any construction that would lead to an expansion of any existing buildings. No major construction or construction-related hauling is anticipated. With that said, any on-site construction activities would be subject to existing Municipal Code regulations for construction-related noise, and off-site construction-related noise from haul trucks would be required to comply with the City's DBS Haul Route Monitoring Program. Any construction activities are anticipated to consist of minor interior renovations (including installation of kitchen facilities in existing units and associated plumbing and electrical work) and would not generate any ground-borne vibration. Additionally, major airports have an airport land use plan that provides guidance on noise levels and land use in adjacent areas. If a site would locate residents within the vicinity of a major airport, the project site would be subject to the guidance provided in the airport land use plan.

Any operational noise upon completion of individual Interim Motel Housing Projects would be required to comply with existing Municipal Code regulations, and is not anticipated to exceed current noise levels on existing sites. Completed projects would not have any significant stationary sources of ground-borne vibration, such as heavy equipment or industrial operations, as individual projects would provide housing in urbanized areas.

Individual projects would not be expected to generate significant vehicular trips and therefore would not have the potential to increase noise levels in excess of current conditions or the standards established in the City's General Plan and noise ordinances.



Peak hour trip generation for supportive housing is 0.12 trips per unit,<sup>5</sup> compared to 0.58 trips per unit for motels and 0.70 trips per unit for hotels.<sup>6</sup> Thus, any noise impacts related to vehicular trips are anticipated to be reduced for projects affected by the IMC Ordinance.

### 13. Population and Housing

Would the project:

- 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)?
- b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?
- c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

#### Less Than Significant Impact.

Supportive housing and transitional housing are two types of affordable housing for persons experiencing homelessness and persons at-risk of homelessness. The IMC Ordinance is designed to respond to existing demand for affordable housing, including supportive housing and transitional housing, by serving an existing population located within the City of Los Angeles. The IMC Ordinance will not induce substantial population growth, as any supportive housing and/or transitional housing developed as a result of the IMC Ordinance would provide new housing for the homeless population that currently exists within the City. Some homeless population could seek to move in to the area in search of supportive housing and/or transitional housing, but this population is not very mobile and it is not anticipated to be a large impact.

Development in accordance with the IMC Ordinance is not anticipated to displace people through the conversion of existing housing, as any residents occupying a motel or hotel on a longer-term residential basis would be accommodated at the project site after the conversion to the supportive housing and/or transitional housing use.

### 14. Public Services

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<sup>5</sup> Trip generation rates from Table 5 of the City of Los Angeles, Transportation Impact Study Guidelines, December 2016. Peak hour trip generation is 0.12 trips per unit for supportive housing; daily trip generation is 1.27 trips per day. For an average 50-unit motel conversion project, this would result in approximately  $1.27 \times 50 = 63.5$  total daily trips.

<sup>6</sup> Trip generation rates from the 8<sup>th</sup> Edition ITE Trip Generation Report. Peak hour trip generation is 0.58 trips per unit for motels and 0.70 trips per unit for hotels; daily trip generation is 9.11 trips per day for motels and 8.92 trips per day for hotels. For an average 50-unit motel, this would result in approximately  $9.11 \times 50 = 455.5$  total daily trips; for an average 50-unit hotel this would result in approximately  $8.92 \times 50 = 446$  total daily trips.

**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 objectives for any of the following public services:**

- a. Fire protection?
- b. Police protection?
- c. Schools?
- d. Parks?
- e. Other Public Facilities?

**No Impact.**

The IMC Ordinance would be implemented on the sites of existing hotels, motels, transient occupancy residential structures and hostels located within the City of Los Angeles, and would therefore contribute to adaptive re-use of existing structures and compact development in an urbanized area. In general, urban areas are well served with fire and police protection services. Further, the goal of the IMC Ordinance is to provide housing for homeless persons, the majority of whom are unsheltered (i.e. accommodating an existing population, and is not growth-inducing). It is far more likely that those who are unsheltered would require public services such as emergency response due to exposure to weather conditions and other dangerous factors than they would require in supportive housing and/or transitional housing. Once housed, the residents would have access to supportive services, which would also reduce the need for additional emergency personnel. Therefore, IMC projects would not result in the need for new or expanded fire protection or police services such that new or physically altered facilities would be required.

Because the IMC Ordinance is anticipated to provide housing to the existing homeless population within the City and would not result in substantial population growth, it is assumed that any future residents of this type of housing is already present in the City and already attends local schools and is already using public parks and other public facilities.

## **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?**
- 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.**

As discussed, the IMC Ordinance is not expected to induce substantial population growth within the City. Developments in accordance with the IMC Ordinance would house the existing homeless population, some of whom are likely using public parks and similar facilities for shelter. As such, the proposed ordinance would not directly 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. The ordinance is intended to allow for the re-use of existing structures for housing, and would not result in increased recreational facilities, nor the construction or expansion of recreational facilities.

**16. Transportation/Circulation****Would the project:**

- 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?**

**Less Than Significant Impact.**

The IMC Ordinance does not allow for any new construction; rather, it facilitates the temporary conversion of existing structures to housing. Traffic volumes are not expected to significantly increase as a result of the Proposed Ordinance. In fact, traffic volumes are likely to decrease with the re-use of existing hotels and motels for supportive and transitional housing. Peak hour trip generation for supportive housing is 0.12 trips per unit,<sup>7</sup> compared to 0.58 trips per unit for motels and 0.70 trips per unit for hotels.<sup>8</sup> Thus, any traffic impacts related to vehicular trips are anticipated to be reduced for projects affected by the IMC Ordinance. Each individual project would be anticipated to generate less than 10 peak hour trips<sup>9</sup> (25 peak hour trips is the threshold for preparing a traffic analysis for a development project to determine whether an individual project could impact

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<sup>7</sup> Trip generation rates from Table 5 of the City of Los Angeles, Transportation Impact Study Guidelines, December 2016. Peak hour trip generation is 0.12 trips per unit for supportive housing; daily trip generation is 1.27 trips per day. For an average 50-unit motel conversion project, this would result in approximately  $1.27 \times 50 = 63.5$  total daily trips.

<sup>8</sup> Trip generation rates from the 8<sup>th</sup> Edition ITE Trip Generation Report. Peak hour trip generation is 0.58 trips per unit for motels and 0.70 trips per unit for hotels; daily trip generation is 9.11 trips per day for motels and 8.92 trips per day for hotels. For an average 50-unit motel, this would result in approximately  $9.11 \times 50 = 455.5$  total daily trips; for an average 50-unit hotel this would result in approximately  $8.92 \times 50 = 446$  total daily trips.

<sup>9</sup> Based on assumption that the average project would have no more than 50 units:  $0.12 \times 50 = 6$  peak hour trips.

the nearby roadway network). Trips from individual projects would be distributed throughout the City, and would have a negligible impact on the transportation network.

- 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?**

**Less Than Significant Impact.**

CMP Traffic Impact Analysis (TIA) Guidelines require that intersection monitoring locations must be examined if an individual development project will add 50 or more trips during either the AM or PM weekday peak hours. Traffic volumes in conjunction with development of supportive housing and transitional housing units that occur pursuant to the Proposed Ordinance would be minimal (less than existing as analyzed above) and would not meet the CMP TIA Guidelines requiring intersection monitoring. Most vehicle trips to and from the project sites would be from service/maintenance workers.

- 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?**

**No Impact.**

Any development activity in accordance with the IMC Ordinance would take place in existing structures located in urban areas, where risk associated with air traffic patterns is low.

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

**No Impact.**

Any development activity in accordance with the IMC Ordinance is not anticipated to result in hazards due to design features or increase conflicts between incompatible uses. The IMC Ordinance would not result in changes being made to the local roadways or impede public access on any public right-of-way. Therefore, implementation of the IMC Ordinance would have no impacts related to design feature hazards.

- e. Result in inadequate emergency access?**

**Less Than Significant Impact.**

The City has designated disaster routes throughout the project area through the Safety Element of the City General Plan. Based on the type of minor construction expected

(adding kitchens, minor interior renovations), it is not foreseeable that construction of future projects could temporarily interfere with local and on-site emergency response. No major construction or construction-related hauling is anticipated. With that said, any construction traffic would conform to access standards to allow adequate emergency access. Compliance with access standards, including the City's DBS Haul Route Monitoring Program would reduce potential impacts on roadways designated as haul routes and emergency response services during construction of future projects.

- f. **Conflict with adopted polices, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?**

**No Impact.**

The IMC Ordinance does not allow for any new construction; rather, it facilitates the temporary conversion of existing structures to housing. Any associated construction activities would result in the conversion of existing structures located in urban areas. Individual projects would not conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities and would not decrease the performance or safety of such facilities.

## 17. Tribal Cultural Resources

**Would the project affect:**

- a. **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resource Code section 5020.1(k)?**
- b. **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

**No Impact.**

Historical buildings suitable for adaptive reuse are not anticipated to be an issue with respect to tribal cultural resource impacts. Most tribal cultural resources are anticipated with buried resources and land valued for association with tribal practices. It is not anticipated that the IMC Ordinance would result in any excavation of soils, as it solely allows for re-use of existing structures.

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 IMC Ordinance has been provided to tribes who have requested such notice in the City of Los Angeles.

## **18. Utilities and Service Systems**

**Would the project:**

- a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**
- 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?**
- 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?**
- d. Have significant water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**
- 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?**
- f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?**
- g. Comply with federal, state, and local statutes and regulations related to solid waste?**

**No Impact.**

As discussed, the IMC Ordinance does not allow for any new construction; rather, it facilitates the temporary conversion of existing structures to housing in order to provide housing for an existing population in the City of Los Angeles. The IMC Ordinance is not intensifying any existing uses and the baseline conditions are not expected to change related to public utilities. Any future uses under the proposed ordinance would be well within the expected growth in the City of Los Angeles and region, and would not exceed the RWQCB standards for treatment of wastewater or the wastewater treatment capacity. Individual projects will occur within existing structures, which would have existing connections to sewer lines and water mains. Individual projects would occur on existing developed sites in urbanized areas and are not anticipated to result in a significant

increase in individual site runoff or changes to the local drainage patterns. Runoff from individual sites would continue to be collected and directed towards existing storm drains. Sufficient capacity remains at existing solid waste facilities in the region necessary to accommodate the solid waste generated during any construction-related activities and the operation of supportive housing and transitional housing projects converted from existing motels.

## 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.**

Any construction activities associated with the Proposed Ordinance would not impact any endangered fauna or flora, modify any special status species habitat, and would only occur on lots containing existing hotels, motels, apartment hotels, transient occupancy residential structures. Any construction activities would be minor, as the ordinance only allows for minor physical alterations that do not lead to any expansion in building size or intensity. Due to the general urban and built nature of the City, construction activities and operation of future development would not impact the habitat or population. The IMC Ordinance would not impact the habitat or population level of fish or wildlife species, nor would it threaten a plant or animal community, nor impact the range of a rare endangered plant or animal.

As discussed in **Section 5, Cultural Resources** and **Section 17, Tribal Cultural Resources**, the IMC 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.**

In a separate effort, the City is pursuing the adoption of a Permanent Supportive Housing (PSH) Ordinance, a code amendment that would establish regulations to define PSH and project eligibility criteria and establish unique development standards for PSH that facilitate ministerial approval of new projects. Unlike the IMC Ordinance, this ordinance is focused on new construction of PSH in qualified locations throughout the City, and would result in a permanent expansion of the City’s supply of PSH. The PSH is independent of the IMC

Ordinance and is not dependent on the passage of the IMC Ordinance. Additionally, the IMC Ordinance is not dependent on the passage of the PSH Ordinance. The City would pursue either of these ordinances independent of the other ordinance. Additionally, neither are the reasonably foreseeable outcome of the other ordinance as both have independent utility. As to the PSH Ordinance, the location and number of properties that would be constructed as a result of this ordinance is not known at this time. For purposes of analyzing the potential environmental impacts associated with the PSH Ordinance,<sup>10</sup> the City has conservatively estimated that the ordinance could result in incremental growth of up to 2,000 new PSH units (located in proximity to transit) over a period of ten years, in addition to 10,000 PSH units anticipated to result from Measure HHH funding.<sup>11</sup> By 2040 SCAG forecasts that, in the City of Los Angeles, there will be an additional approximately 237,000 households (compared to 2016) as well as other types of development. In addition, SCAG forecasts that the City will add 665,400 people over the same time period. Construction of PSH units represent a small fraction of anticipated growth in the City of Los Angeles between 2016 and 2040 (about 5 percent); the potential increment of additional PSH housing that could be attributable to the PSH Ordinance would be even smaller (0.8 percent). The 2016 RTP/SCS PEIR identifies the anticipated impacts of cumulative development through 2040 throughout the region. While overall cumulative development in the City could result in significant impacts in some issue areas, PSH development in general would not result in a cumulatively significant contribution to these impacts because:

- PSH development must comply with numerous applicable regulations in the City of Los Angeles (Regulatory Compliance Measures)
- PSH development would be located in urban areas well-served by infrastructure
- PSH units are generally required to be energy efficient by funding sources
- PSH units have generally very low trip generation

The proposed PSH Ordinance is not expected to result in substantial physical environmental impacts. The potential for overlapping or cumulative impacts from the PSH Ordinance with the Proposed IMC Ordinance is negligible.

Based on the preceding discussions, no significant impacts were identified for the 18 environmental factors analyzed above. The IMC Ordinance would not result in impacts that are cumulatively considerable. No impact would occur and no further analysis is required.

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

**No Impact.**

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<sup>10</sup> See Mitigated Negative Declaration, case no. ENV-2017-3137-MND prepared for the PSH Ordinance.

<sup>11</sup> Measure HHH is a \$1.2 billion local (City of Los Angeles) bond measure that was approved in November 2016, generated over a period of ten years. This funding source is expected to fund the construction of 10,000 new units of PSH during that time period.



As identified throughout the analysis, the Proposed Ordinance would not have an environmental effect that would cause substantial adverse effects on human beings directly or indirectly. The Proposed Ordinance is expected to have beneficial health effects on the future residents of the motel conversions.

#### **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.