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**SUPPLEMENTAL TRAFFIC ANALYSIS
BREAKERS HOTEL
210 East Ocean Boulevard**

Overland Traffic Consultants prepared a Traffic Impact Study dated October 25, 2018 (Approved TIS) that was reviewed and approved by the City of Long Beach Public Works, Traffic Section. Based on community input and direction from the City of Long Beach, our office has conducted a supplemental trip generation analysis for the proposed Breakers Hotel renovation and expansion project. This analysis was conducted to evaluate potential traffic conditions and determine if any additional impacts that would be created by incorporating an updated and expanded cumulative project list. Cumulative projects are projects in the area surrounding a development area that are either under construction, currently approved or entitled, in plan check, pending evaluation or pending approval. Typically, not all cumulative projects will be built or built to the intensity currently envisioned. In traffic analyses, cumulative projects provide growth to potential future traffic conditions. The City of Long Beach considers Level of Service (LOS) D to be the upper limit of satisfactory conditions. According to standards adopted by the City of Long Beach, a traffic impact is considered significant if project traffic causes an intersection to deteriorate from LOS D or better to LOS E or F or if project traffic causes an intersection operating at LOS E or F as a baseline condition to increase the intersections volume to capacity ratio by 0.02 or more. An expanded cumulative project evaluation of future traffic conditions provides for a more conservative analysis. As demonstrated below, the conclusions of the Approved TIS, that there are no significant traffic impacts created by the Breakers Hotel renovation and expansion, does not change with this supplemental traffic analysis incorporating an updated and expanded cumulative project evaluation.

Cumulative Project Update

The cumulative project list has been revised to incorporate additional cumulative projects proposed in the area since the time of the Approved TIS, those not fully constructed and an expanded study area. The new cumulative project list is developed from information provided by Long Beach Development Services Planning Bureau. Cumulative projects number 38 through 64 have been added in this analysis. In addition, cumulative project number 22 (New Civic Center Residential & Commercial Mixed-Use) has an updated project description and trip generation incorporated in the analysis. A summary of the cumulative projects included in this analysis, with their location and description, is provided in Table 1. An updated cumulative

projects map is provided on Figure 1 on page 5. The cumulative projects' trip generation is provided in Attachment A.

Table 1
Cumulative Project Summary

#	Project Address	Description	Status
1	635 Pine Avenue and 636 Pacific Avenue	Mixed Use. Two 8-story buildings connected by a breezeway containing 271 residential units with an affordable housing component (11 units)	Project Entitled
2	936 Pine Avenue (Former American Cancer Society Office)	Adaptive Reuse. Approved for conversion from office to residential in front with four units in the rear.	Project Entitled
3	425 E. 5th Street (Successor Agency)	Mixed Use . 5-story, 15-unit residential development.	Project Entitled
4	229 16th Street	Apartments. SPR for new construction of six townhomes on a narrow lot in Midtown SP.	Project Entitled
5	1400 Long Beach Boulevard	Mixed Use. 4 - Story with 65 residential units, 2,300 sq.ft. of floor retail.	Project Entitled
6	200-256 Long Beach Blvd - Broadway Block	Mixed Use. 392-unit and 32,000 sq.ft. commercial development (Acres of Books site). 21-story tower and 7-story mid-rise, retaining Acres of Books building	Project Entitled
7	500 W. Broadway - Broadway & Magnolia Apartments	Mixed Use. Seven-story, 142-unit residential project with 3,000 sq. ft. of retail and a three-level parking garage.	Project Entitled
8	320 Alamitos Ave	Mixed Use . 77-unit residential redevelopment on a vacant site	Project Entitled
9	495 The Promenade North	Mixed Use, 4-stories, 20 residential units, 5,200 sf retail	Project Entitled - Building Permits Issued
10	434 E. 4th St	Mixed Use, 49 residential units	Under Construction
11	1834 Harbor Ave	2-story industrial building (51,453 square feet)	Project Entitled
12	245 W. Broadway	Mixed Use high-rise w/ 222 residential & 8,500 sf retail	Under Construction
13	230 W. 3rd St (3rd and Pacific)	Residential High-Rise (163 units)	Under Construction
14	1235 Long Beach Blvd	Residential (160 residential units)	Under Construction
15	1795 Long Beach Blvd.	Mixed Use (101 residential units, 4,051 sf commercial)	Project Entitled
16	1570-1598 Long Beach Blvd	4-story mixed use (36 residential units, 10,000 sf commercial)	Under Construction
17	538 Golden Ave	Residential Development (3 residential units)	Project Entitled
18	944 Pacific Ave	Adaptive Reuse from office to residential	Project Entitled - Bldg plan review in progress
19	825 E. 7th St	Residential Building (19 residential units)	Project Entitled
20	442 Crystal Court	Single-Family Residential	Project Entitled
21	2136-2144 W. 16th St.	Two Office Buildings (8,000 sf)	Project Entitled
22	New Civic Center	Residential and Commercial	From Civic Center Staff Report: The specific future developments for the residential/commercial would come before the Planning Commission at a later date, with their own individual Site Plan Review once they are fully designed. Trip Generation from LL&G Traffic Study for Project dated July 2015 with prior use credits
	North of Ocean Bl, south of Broadway & between Magnolia Av & Pacific Av	270,000 sf City Hall, 93,500 sf Library, 232,000 sf Headquarters, with up to 580 residential units, 32,000 square feet of retail space, and 8,000 square feet of restaurant space. A high-rise, 200-room hotel is also a potential Center Block component. An underground parking structure containing up to 725 parking stalls would service these uses, and the existing Broadway Garage would remain in place, for use by City employees and visitors of the Civic Center.	

**Table 1 continued
Cumulative Project Summary**

#	Project Address	Description	Status
23	422 W. Ocean Blvd	Residential Development (94 units)	Under Construction
24	110 W. Ocean Blvd	Adaptive reuse of Ocean Center Building (74 units, 5,400 sf retail, 7,200 sf restaurant)	Under Construction
25	150 W. Ocean Blvd	5-Story Residential Building (216 units)	Under Construction
26	207 Seaside Way	5-Story Residential Building (112 units)	Under Construction
27	227 Elm Ave	Residential Development (40 units)	Under Construction
28	200 W. Ocean Blvd	Adaptive reuse of office building to residential (98 units)	Under Construction
29	107 Long Beach Blvd	5-Story Hotel (34 hotel rooms), with modification to allow for 8 car lifts	Under Construction,
30	100 Aquarium Way	Addition to Aquarium (22,642 sf)	Under Construction
31	101 Alamitos Ave	Mixed Use (136 units, 2,570 sf retail)	Under Construction
32	2010 E. Ocean Blvd	Hotel/Residential (56 units, 40 hotel rooms)	Project Entitled - In plan check
33	777 E. Ocean Blvd.	High rise residential, 315 units residential, 6711 sf retail	Project Entitled - In plan check
34	135 Linden Ave	7-Story mixed use building (82 units, 4,091 sf retail)	Project Entitled - In plan check
35	435 Cerritos Ave	Single-family residence	Project Entitled
36	1078, 1080-1090 Atlantic Ave	Medical Office Building (11,000 sf)	Project Entitled
37	1112 Locust Avenue	97 unit Apartment Building	Project Proposed
38	1628-1724 E. Ocean Blvd.	Add 51 units condo to 47 unit motel	In Construction
39	600 W. Broadway	694 Dwelling Units, appx. 3,200 sf of retail and a commercial, residential and retail parking structure	Pending
40	1101-1105, 1107, 1145 & 1157 Long Beach Blvd.	120 Unit Multi-Family Apartment and 4,997 sf retail	Approved
41	110 Pine Ave	Former Security Pacific National Bank Building is a 1925 designated historic landmark, a 13-story office building with basement, totaling 107,309 SF and is sited on a 11,255 SF parcel. The adaptive re-use project will consist of the design for a 189-room hotel, featuring the existing historic lobby as a "jump lobby", a Hotel Sky Lobby with the potential for a roof terrace. Building to be fully upgraded to current codes & safety standards.	Pending
42	100 E. Ocean Blvd.	429 room High Rise Hotel with ballroom, meeting rooms, pool deck and restaurants	Pending
43	1126 Queens Highway	Queen Mary Renovation Project: Six story 200 key hotel with 6 entertainment buildings to include 323,641 sf including 150,980 sf of restaurants, 38,254 sf of retail, 150,000 sf of theater, 17,000 sf of bowling alley, 52,120 sf of golf venue, 4,000 sf museum, 61,287 sf of childrens venue, education and aquatic center	Pending - Conceptual Review, No Phasing Plan yet, Speculative
44	Blue Line Renovations	Modernization of Transit Agency's oldest train line (1990). 4 new switches, new signals, new tracs and street level intersections.	Short Term Station Closures - No permanent impact.
45	507 Pacific Ave	4-story, 134-unit mixed use with 7,200 sf of retail/commercial/office space	Pending
46	700 W. 17th st.	29,733 sf industrial building	Pending
47	1468 14th St.	3-story, 22,000 sf warehouse with covered and uncovered parking	
48	469 Pacific Coast Hwy	4-story affordable housing, 39 units and 1 manager unit	Pending

**Table 1 continued
Cumulative Project Summary**

#	Project Address	Description	Status
49	245 W. Pacific Coast Hwy.	Mixed use building with 135 units and 25,000 sf of commercial space	
50	201 W. Pacific Coast Hwy.	147 unit mixed use project with 189,000 sf total	Pending
51	1900-1940 Long Beach Blvd.	5-story mixed use building with 95 apartment units and 12,400 sf of retail.	In Plan Check, not constructed
52	1836-1852 Locust Ave.	47 affordable units, 1 manager unit, 3600 sf of commercial space and 40 parking spaces	Not constructed, plan check approved
53	1901 W. Pacific Coast Hwy.	1 industrial building with 194,840 sf.	Under Construction
54	127-139 E. Broadway	189 apartments and 10,000 sf retail space mixed use building and 103,290 sf garage	
55	1675 Santa Fe	21,377 sf industrial building	Pending
56	2111 W. 14th st.	New 38,440 sf industrial manufacturing building.	Pending
57	1341 Long Beach Blvd.	24 unit, 4-story apartment building	Pending
58	1401 Long Beach Blvd.	142 unit apartment building	Pending
59	125 Long Beach Blvd.	Mixed use 218 units and 7300 sf of commercial space.	Pending
60	1 & 11 Golden Shore	Mixed use project with 750 dwelling units and 11,000 sf of commercial space.	Pending
61	1601 San Francisco Ave.	2 industrial buildings totaling 94,872 sf	Pending
62	810 Pine Ave.	78 assisted living units	Pending
63	131 W. 3rd St.	Mixed use development with 345 dwelling units and 16,000 sf ground floor retail.	Pending
64	231 Windsor Way	321,595 sf expansion to the existing parking structure.	Pending

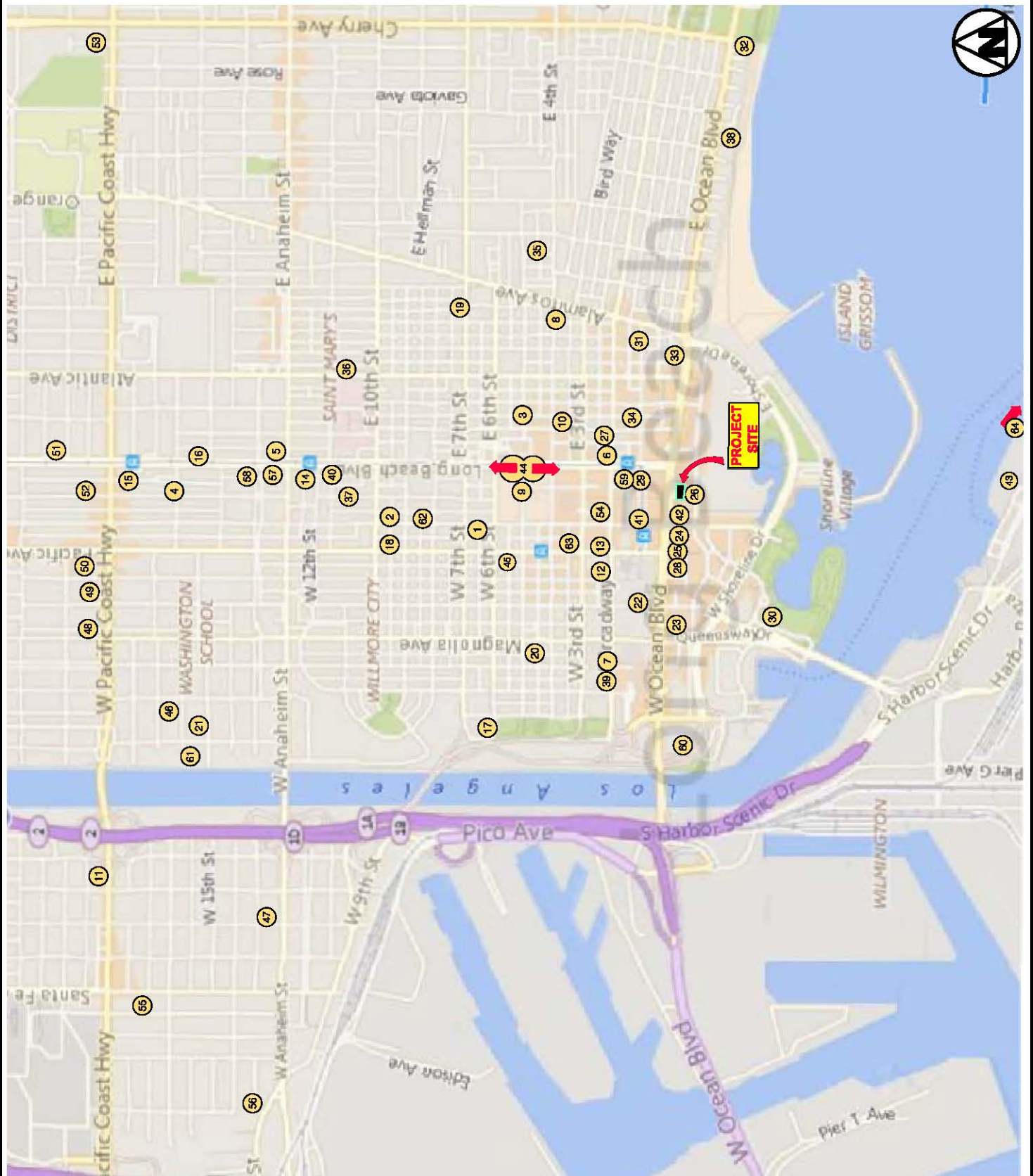


FIGURE 1

1/2019

CUMULATIVE PROJECT LOCATIONS



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ANALYSIS PROCESS

Updated and expanded cumulative project trips have been incorporated into the future analysis at the ten study intersections. The Project trip distribution remains the same as the Approved TIS. Cumulative project trips were determined based on Institute of Transportation Engineers (ITE), Trip Generation Manual, 10th Edition. These trips were distributed through the study intersections based on type of development and proximity to the study intersections.

As with the Approved TIS, the City of Long Beach required Intersection Capacity Utilization (ICU) analysis was conducted at the intersections of West Ocean Boulevard & Queens Way/Magnolia Avenue, West Ocean Boulevard & Pacific Avenue, Broadway & Pine Avenue, Ocean Boulevard & Pine Avenue, Seaside Way & Pine Avenue, Shoreline Drive & Pine Avenue, East Ocean Boulevard & Locust Avenue, East 3rd Street & Long Beach Boulevard, and East Ocean Boulevard & Alamitos Avenue/Shoreline Drive.

RESULTS OF ANALYSIS

A comparison of existing conditions was not repeated in this supplemental analysis but is presented as shown in the Approved TIS. The Existing and Exiting + Project traffic conditions would not change with an expanded cumulative project evaluation. A comparison of the Future (2022) Without Project conditions, with an expanded and updated cumulative project list, and Future (2022) With Project conditions was conducted based on the City of Long Beach Impact Criteria as provided in Table 2.

Table 2
Significant Impact Criteria
City of Long Beach

- Project traffic causes an intersection to deteriorate from LOS D or better to LOS E or F; or
- Project traffic causes an increase in volume to capacity ration of 0.02 or more when the intersection is operating at LOS E or F in baseline conditions.

No significant traffic impacts were identified with the Breakers Hotel Renovation and Expansion Project and the updated and expanded cumulative projects. Table 3 displays the results of the analysis. Attachment B provides the ICU analysis worksheets.

Table 3
ICU Summary with
Updated and Expanded Cumulative Projects

No.	Intersection	Peak Hour	Existing (2018)		Existing +Project			Significant Impact	Future (2021) + Cumulative Projects		Future (2021) + Cumulative Projects + Project			Significant Impact
			ICU	LOS	ICU	LOS	Impact		ICU	LOS	ICU	LOS	IMPACT	
1	W Ocean Boulevard & Queens Way/Magnolia Av	AM	0.546	A	0.548	A	+ 0.002	NO	0.619	B	0.620	B	+ 0.001	NO
		PM	0.630	B	0.635	A	+ 0.005	NO	0.756	C	0.761	C	+ 0.005	NO
2	W Ocean Boulevard & Pacific Avenue	AM	0.580	A	0.582	A	+ 0.002	NO	0.629	B	0.631	B	+ 0.002	NO
		PM	0.521	A	0.524	A	+ 0.003	NO	0.662	B	0.667	B	+ 0.005	NO
3	Broadway & Pine Avenue	AM	0.375	A	0.380	A	+ 0.005	NO	0.424	A	0.430	A	+ 0.006	NO
		PM	0.615	B	0.625	B	+ 0.010	NO	0.695	B	0.705	C	+ 0.010	NO
4	Ocean Boulevard & Pine Avenue	AM	0.494	A	0.496	A	+ 0.002	NO	0.553	A	0.561	A	+ 0.008	NO
		PM	0.623	B	0.637	B	+ 0.014	NO	0.720	C	0.733	C	+ 0.013	NO
5	Seaside Way & Pine Avenue	AM	0.202	A	0.202	A	+ 0.000	NO	0.234	A	0.234	A	+ 0.000	NO
		PM	0.255	A	0.255	A	+ 0.000	NO	0.297	A	0.297	A	+ 0.000	NO
6	Shoreline Drive & Pine Avenue	AM	0.323	A	0.325	A	+ 0.002	NO	0.366	A	0.368	A	+ 0.002	NO
		PM	0.450	A	0.452	A	+ 0.002	NO	0.504	A	0.505	A	+ 0.001	NO
7A	E Ocean Boulevard & Locust Avenue	AM	0.484	A	0.511	A	+ 0.027	NO	0.568	A	0.594	A	+ 0.026	NO
		PM	0.468	A	0.545	A	+ 0.077	NO	0.574	A	0.652	B	+ 0.078	NO
7B	E Ocean Boulevard & Locust Avenue	AM	0.484	A	0.523	A	+ 0.039	NO	0.569	A	0.608	B	+ 0.039	NO
		PM	0.468	A	0.504	A	+ 0.036	NO	0.563	A	0.634	B	+ 0.071	NO
8	E 3rd Street & Long Beach Boulevard	AM	0.535	A	0.538	A	+ 0.003	NO	0.607	B	0.610	B	+ 0.003	NO
		PM	0.393	A	0.399	A	+ 0.006	NO	0.479	A	0.484	A	+ 0.005	NO
9	E Ocean Boulevard & Long Beach Boulevard	AM	0.571	A	0.582	A	+ 0.011	NO	0.673	B	0.684	B	+ 0.011	NO
		PM	0.518	A	0.527	A	+ 0.009	NO	0.603	B	0.612	B	+ 0.009	NO
10	E Ocean Boulevard & Alamitos Av/Shoreline Dr	AM	0.735	C	0.742	C	+ 0.007	NO	0.831	D	0.838	D	+ 0.007	NO
		PM	0.815	D	0.817	D	+ 0.002	NO	0.944	E	0.945	E	+ 0.001	NO

SUMMARY & CONCLUSIONS

Analysis of the proposed Breakers Hotel Project has been updated to include additional and updated cumulative projects. Using City of Long Beach approved ICU analysis process and significant traffic impact criteria no significant traffic impacts are identified. The analysis at the ten study intersections in the Breakers Hotel area most likely affected by the renovation and expansion indicates no expected significant traffic impacts with the proposed project at 210 E Ocean Boulevard.

ATTACHMENT A

Cumulative Project Details

#	Project Address	Description	Status	Daily Traffic	AM Peak Hour			PM Peak Hour		
					IN	OUT	TOTAL	IN	OUT	TOTAL
1	635 Pine Avenue and 636 Pacific Avenue	Mixed Use. Two 8-story buildings connected by a breezeway containing 271 residential units with an affordable housing component (11 units)	Project Entitled	2037	30	96	126	99	59	158
2	936 Pine Avenue (Former American Cancer Society Office)	Adaptive Reuse. Approved for conversion from office to residential in front with four units in the rear.	Project Entitled	29	2	0	2	1	1	2
3	425 E. 5th Street (Successor Agency)	Mixed Use . 5-story, 15-unit residential development.	Project Entitled	110	2	5	7	6	3	9
4	229 16th Street	Apartments. SPR for new construction of six townhomes on a narrow lot in Midtown SP.	Project Entitled	44	1	2	3	2	1	3
5	1400 Long Beach Boulevard	Mixed Use. 4 - Story with 65 residential units, 2,300 sq.ft. of floor retail.	Project Entitled	547	8	23	31	27	17	44
6	200-256 Long Beach Blvd - Broadway Block	Mixed Use. 392-unit and 32,000 sq.ft. commercial development (Acres of Books site). 21-story tower and 7-story mid-rise, retaining Acres of Books building	Project Entitled	3740	55	14	202	181	128	309
7	500 W. Broadway - Broadway & Magnolia Apartments	Mixed Use. Seven-story, 142-unit residential project with 3,000 sq. ft. of retail and a three-level parking garage.	Project Entitled	1171	17	51	68	57	37	94
8	320 Alamitos Ave	Mixed Use . 77-unit residential redevelopment on a vacant site	Project Entitled	564	8	27	35	27	16	43
9	495 The Promenade North	Mixed Use, 4-stories, 20 residential units, 5,200 sf retail	Project Entitled - Building Permits Issued	288	9	4	13	7	8	15
10	434 E. 4th St	Mixed Use, 49 residential units	Under Construction	548	8	19	27	27	20	47
11	1834 Harbor Ave	2-story industrial building (51,453 square feet)	Project Entitled	255	32	4	36	3	20	23
12	245 W. Broadway	Mixed Use high-rise w/ 222 residential & 8,500 sf retail	Under Construction	1857	27	81	108	89	57	146
13	230 W. 3rd St (3rd and Pacific)	Residential High-Rise (163 units)	Under Construction	1193	17	57	75	57	34	91
14	1235 Long Beach Blvd	Residential (160 residential units)	Under Construction	576	12	22	34	24	19	43
15	1795 Long Beach Blvd.	Mixed Use (101 residential units, 4,051 sf commercial)	Project Entitled	892	13	36	49	44	29	73
16	1570-1598 Long Beach Blvd	4-story mixed use (36 residential units, 10,000 sf commercial)	Under Construction	537	24	8	16	26	22	48
17	538 Golden Ave	Residential Development (3 residential units)	Project Entitled	22	0	1	1	1	1	2
18	944 Pacific Ave	Adaptive Reuse from office to residential	Project Entitled - Bldg plan review in progress	51	4	5	9	13	13	26
19	825 E. 7th St	Residential Building (19 residential units)	Project Entitled	139	3	6	9	7	4	11
20	442 Crystal Court	Single-Family Residential	Project Entitled	10	0	1	1	1	0	1
21	2136-2144 W. 16th St.	Two Office Buildings (8,000 sf)	Project Entitled	78	8	1	9	1	8	9
22	New Civic Center North of Ocean Bl, south of Broadway & between Magnolia Av & Pacific Av	Residential and Commercial 270,000 sf City Hall, 93,500 sf Library, 232,000 sf Headquarters, with up to 580 residential units, 32,000 square feet of retail space, and 8,000 square feet of restaurant space. A high-rise, 200-room hotel is also a potential Center Block component. An underground parking structure containing up to 725 parking stalls would service these uses, and the existing Broadway Garage would remain in place, for use by City employees and visitors of the Civic Center.	From Civic Center Staff Report: The specific future developments for the residential/commercial would come before the Planning Commission at a later date, with their own individual Site Plan Review once they are fully designed. Trip Generation from LL&G Traffic Study for Project dated July 2015 with prior use credits	10923	377	294	671	247	305	552
23	422 W. Ocean Blvd	Residential Development (94 units)	Under Construction	688	10	33	43	33	20	53
24	110 W. Ocean Blvd	Adaptive reuse of Ocean Center Building (74 units, 5,400 df retail, 7,200 sf restaurant)	Under Construction	1395	49	61	110	115	72	43
25	150 W. Ocean Blvd	5-Story Residential Building (216 units)	Under Construction	1581	23	76	99	77	45	122

#	Project Address	Description	Status	Daily Traffic	AM Peak Hour			PM Peak Hour		
					IN	OUT	TOTAL	IN	OUT	TOTAL
26	207 Seaside Way	5-Story Residential Building (112 units)	Under Construction	820	12	40	52	40	23	63
27	227 Elm Ave	Residential Development (40 units)	Under Construction	293	4	14	18	148	22	8
28	200 W. Ocean Blvd	Adaptive reuse of office building to residential (98 units)	Under Construction	717	10	35	45	35	20	55
29	107 Long Beach Blvd	5-Story Hotel (34 hotel rooms), with modification to allow for 8 car lifts	Under Construction,	284	9	7	16	10	10	20
30	100 Aquarium Way	Addition to Aquarium (22,642 sf)	Under Construction	50	5	1	6	4	0	4
31	101 Alamitos Ave	Mixed Use (136 units, 2,570 sf retail)	Under Construction	1067	16	49	65	51	32	84
32	2010 E. Ocean Blvd	Hotel/Residential (56 units, 40 hotel rooms)	Project Entitled - In plan check	497	13	17	30	22	15	37
33	777 E. Ocean Blvd.	High rise residential, 315 units residential, 6711 sf retail	Project Entitled - In plan check	1280	21	64	85	65	40	105
34	135 Linden Ave	7-Story mixed use building (82 units, 4,091 sf retail)	Project Entitled - In plan check	754	11	31	42	37	25	62
35	435 Cerritos Ave	Single-family residence	Project Entitled	10	0	1	1	1	0	1
36	1078, 1080-1090 Atlantic Ave	Medical Office Building (11,000 sf)	Project Entitled	383	24	7	31	11	27	38
37	1112 Locust Avenue	97 unit Apartment Building	Project Proposed	528	9	26	35	26	17	43
38	1628-1724 E. Ocean Blvd.	Add 51 units condo to 47 unit motel	In Construction	277	5	14	19	14	9	23
39	600 W. Broadway	694 Dwelling Units, appx. 3,200 sf of retail and a commercial, residential and retail parking structure	Pending	5168	75	246	321	250	148	398
40	1101-1105, 1107, 1145 & 1157 Long Beach Blvd.	120 Unit Multi-Family Apartment and 4,997 sf retail	Approved	1015	15	44	59	49	32	81
41	110 Pine Ave	Former Security Pacific National Bank Building is a 1925 designated historic landmark, a 13-story office building with basement, totaling 107,309 SF and is sited on a 11,255 SF parcel. The adaptive re-use project will consist of the design for a 189-room hotel, featuring the existing historic lobby as a "jump lobby", a Hotel Sky Lobby with the potential for a roof terrace. Building to be fully upgraded to current codes & safety standards.	Pending	1581	53	36	89	58	55	113
42	100 E. Ocean Blvd.	429 room High Rise Hotel with ballroom, meeting rooms, pool deck and restaurants	Pending	3587	119	83	202	132	126	258
43	1126 Queens Highway	Queen Mary Renovation Project: Six story 200 key hotel with 6 entertainment buildings to include 323,641 sf including 150,980 sf of restaurants, 38,254 sf of retail, 150,000 sf of theater, 17,000 sf of bowling alley, 52,120 sf of golf venue, 4,000 sf museum, 61,287 sf of childrens venue, education and aquatic center	Pending - Conceptual Review, No Phasing Plan yet, Speculative	6071	123	80	203	275	289	564
44	Blue Line Renovations	Modernization of Trransit Agencys oldest train line (1990). 4 new switches, new signals, new tracs and street level intesections.	Short Term Station Closures - No permanent impact.	0	0	0	0	0	0	0
45	507 Pacific Ave	4-story, 134-unit mixed use with 7,200 sf of retail/commercial/office space	Pending	1178	17	49	66	57	38	95
46	700 W. 17th st.	29,733 sf industrial building	Pending	147	18	2	20	2	16	18
47	1468 14th St.	3-story, 22,000 sf warehouse with covered and uncovered parking		38	3	1	4	1	3	4
48	469 Pacific Coast Hwy	4-story affordable housing, 39 units and 1 manager unit	Pending	293	4	13	17	14	8	22
49	245 W. Pacific Coast Hwy.	Mixed use building with 135 units and 25,000 sf of commercial space		1669	25	54	79	81	64	145
50	201 W. Pacific Coast Hwy.	147 unit mixed use project with 189,000 sf total	Pending	2164	32	62	94	105	87	192
51	1900-1940 Long Beach Blvd.	5-story mixed use building with 95 apartment units and 12,400 sf of retail.	In Plan Check, not constructed	1033	15	37	52	50	37	87
52	1836-1852 Locust Ave.	47 affordable units, 1 manager unit, 3600 sf of commercial space and 40 parking spaces	Not constructed, plan check approved	450	7	17	24	22	15	37
53	1901 W. Pacific Coast Hwy.	1 industrial building with 194,840 sf.	Under Construction	966	120	16	136	16	107	123
54	127-139 E. Broadway	189 apartments and 10,000 sf retail space mixed use building and 103,290 sf garage		1656	24	70	94	80	53	133
55	1675 Santa Fe	21,377 sf industrial building	Pending	106	13	1	14	2	12	14
56	2111 W. 14th st.	New 38,440 sf industrial manufacturing building.	Pending	117	14	4	18	5	14	20

#	Project Address	Description	Status	Daily Traffic	AM Peak Hour			PM Peak Hour		
					IN	OUT	TOTAL	IN	OUT	TOTAL
57	1341 Long Beach Blvd.	24 unit, 4-story apartment building	Pending	176	3	8	11	9	5	14
58	1401 Long Beach Blvd.	142 unit apartment building	Pending	1039	15	50	65	50	30	80
59	125 Long Beach Blvd.	Mixed use 218 units and 7300 sf of commercial space.	Pending	1794	26	78	104	86	56	142
60	1 & 11 Golden Shore	Mixed use project with 750 dwelling units and 11,000 sf of commercial space.	Pending	5756	83	268	351	277	169	446
61	1601 San Francisco Ave.	2 industrial buildings totaling 94,872 sf	Pending	471	58	7	65	8	52	60
62	810 Pine Ave.	78 assisted living units	Pending	203	9	6	15	9	20	29
63	131 W. 3rd St.	Mixed use development with 345 dwelling units and 16,000 sf ground floor retail.	Pending	2912	43	126	169	140	92	232
64	231 Windsor Way	321,595 sf expansion to the existing parking structure.	Pending	0	0	0	0	0	0	0

ATTACHMENT B

ICU Worksheets



INTERSECTION 1: W OCEAN BL & QUEENS WAY
EXISTING CONDITION (2018)

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 1: W OCEAN BL & QUEENS WAY
EXISTING + PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	Project	TOTAL	AM PEAK HOUR				PM PEAK HOUR			
						V/C	CRITICAL PAIR	EXISTING	Project	TOTAL	V/C	CRITICAL PAIR	
NB LEFT	1	1,600	15	0	15	0.009	*	55	0	55	0.034	*	
NB THRU	2	3,200	21	0	21	0.007		84	0	84	0.026		
NB RIGHT	1	1600	29	2	31	0.000		79	4	83	0.027		
							0.112						0.190
SB LEFT	1	1,600	150	0	150	0.094		200	0	200	0.125		
SB THRU	2	3,200	108	0	108	0.034		63	0	63	0.020		
SB RIGHT	1	1,600	165	0	165	0.103		250	0	250	0.156		

EB LEFT	1	1,600	69	0	69	0.043	*	121	0	121	0.076		
EB THRU	3	4,800	454	10	464	0.101		1375	14	1389	0.294		
EB RIGHT	0	0	22	0	22	0.000		23	0	23	0.000		
							0.336						0.345
WB LEFT	1	1,600	133	2	135	0.084		78	3	81	0.051	*	
WB THRU	3	4800	1398	7	1405	0.293	*	841	12	853	0.178		
WB RIGHT	1	1,600	130	0	130	0.034		98	0	98	0.000		

RTOR				NORTH/SOUTH CRITICAL SUM				0.112	NORTH/SOUTH CRITICAL SUM				0.190
am pm				EAST/WEST CRITICAL SUM				0.336	EAST/WEST CRITICAL SUM				0.345
NB	68	41	CLEARANCE INTERVAL				0.100	CLEARANCE INTERVAL				0.100	
SB	0	0											
EB	15	55	INTERSECTION ICU VALUE				0.548	INTERSECTION ICU VALUE				0.635	
WB	75	100											
AM INTERSECTION LOS						A	PM INTERSECTION LOS						B
AM IMPACT						0.002	PM IMPACT						0.005

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 1: W OCEAN BL & QUEENS WAY
EXISTING + AMBIENT+ CUMULATIVE PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT GROWTH	RELATED PROJECT	TOTAL	AM PEAK HOUR			PM PEAK HOUR			CRITICAL PAIR			
							V/C	CRITICAL PAIR	EXISTING	AMBIENT GROWTH	RELATED PROJECT	TOTAL		V/C		
NB LEFT	1	1,600	15	1	0	16	0.010	*	0.138	55	3	0	58	0.036	*	
NB THRU	2	3,200	21	1	84	106	0.033	*		84	4	79	167	0.052		
NB RIGHT	1	1600	29	1	13	43	0.000			79	4	31	114	0.037		
SB LEFT	1	1,600	150	8	11	169	0.105	*	0.381	200	10	21	231	0.145		
SB THRU	2	3,200	108	6	40	154	0.048			63	3	88	154	0.048		
SB RIGHT	1	1,600	165	8	32	205	0.128	*		250	13	73	336	0.210	*	
<hr/>																
EB LEFT	1	1,600	69	4	9	82	0.051	*	0.381	121	6	22	149	0.093		
EB THRU	3	4,800	454	23	125	602	0.131			1375	70	172	1617	0.342	*	
EB RIGHT	0	0	22	1	4	27	0.000			23	1	2	26	0.000		
WB LEFT	1	1,600	133	7	23	163	0.102		0.381	78	4	27	109	0.068	*	
WB THRU	3	4800	1398	71	114	1583	0.330	*		841	43	155	1039	0.216		
WB RIGHT	1	1,600	130	7	85	222	0.086			98	5	70	173	0.036		
<hr/>																
RTOR				NORTH/SOUTH CRITICAL SUM					0.138	NORTH/SOUTH CRITICAL SUM					0.246	
am				EAST/WEST CRITICAL SUM					0.381	EAST/WEST CRITICAL SUM					0.410	
pm				CLEARANCE INTERVAL					0.100	CLEARANCE INTERVAL					0.100	
NB	81	54														
SB	0	0														
EB	16	58	INTERSECTION ICU VALUE					0.619	INTERSECTION ICU VALUE					0.756		
WB	84	116														
							AM INTERSECTION LOS	B	PM INTERSECTION LOS							C
							AM IMPACT	0.073	PM IMPACT							0.126

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 1: W OCEAN BL & QUEENS WAY
EXISTING + AMBIENT+ CUMULATIVE PROJECT + PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	AM PEAK HOUR					PM PEAK HOUR						
								V/C	CRITICAL PAIR	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	V/C	CRITICAL PAIR			
NB LEFT	1	1,600	15	1	0	0	16	0.010	*		55	3	0	0	58	0.036	*		
NB THRU	2	3,200	21	1	84	0	106	0.033	*		84	4	79	0	167	0.052			
NB RIGHT	1	1600	29	1	13	2	45	-0.023			79	4	31	4	118	0.039			
										0.138							0.246		
SB LEFT	1	1,600	150	8	11	0	169	0.105	*		200	10	21	0	231	0.145			
SB THRU	2	3,200	108	6	40	0	154	0.048			63	3	88	0	154	0.048			
SB RIGHT	1	1,600	165	8	32	0	205	0.128			250	13	73	0	336	0.210			
<hr/>																			
EB LEFT	1	1,600	69	4	9	0	82	0.051	*		121	6	22	0	149	0.093			
EB THRU	3	4,800	454	23	125	10	612	0.133			1375	70	172	14	1631	0.345	*		
EB RIGHT	0	0	22	1	4	0	27	0.000			23	1	2	0	26	0.000			
										0.382							0.415		
WB LEFT	1	1,600	133	7	23	2	165	0.103			78	4	27	3	112	0.070	*		
WB THRU	3	4800	1398	71	114	7	1590	0.331	*		841	43	155	12	1051	0.219			
WB RIGHT	1	1,600	130	7	85	0	222	0.086			98	5	70	0	173	0.036			
<hr/>																			
RTOR				NORTH/SOUTH CRITICAL SUM						0.138		NORTH/SOUTH CRITICAL SUM						0.246	
am				EAST/WEST CRITICAL SUM						0.382		EAST/WEST CRITICAL SUM						0.415	
pm				CLEARANCE INTERVAL						0.100		CLEARANCE INTERVAL						0.100	
NB	82	56																	
SB	0	0																	
EB	16	58	INTERSECTION ICU VALUE						0.620		INTERSECTION ICU VALUE						0.761		
WB	84	116																	
								AM INTERSECTION LOS		B		PM INTERSECTION LOS						C	
								AM IMPACT		0.001		PM IMPACT						0.000	



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 2: W OCEAN BL & PACIFIC AV
EXISTING CONDITION (2018)

MOVEMENT	NO. OF LANES	CAPACITY	AM PEAK HOUR			PM PEAK HOUR			CRITICAL PAIR	
			Traffic VOLUMES	V/C		Traffic VOLUMES	V/C			
NB LEFT	0	0	3	0.000	* 0.101	10	0.000	* 0.084		
NB THRU	1	1600	2	0.004		4	0.012			
NB RIGHT	0	0	2	0.000		5	0.000			
SB LEFT	1.5	2,400	60	0.025	* 0.379	113	0.047	* 0.337		
SB THRU	0.5	800	2	0.000		1	0.000			
SB RIGHT	1	1,600	162	0.101		135	0.084			
<hr/>										
EB LEFT	1	1,600	118	0.074	* 0.379	176	0.110	* 0.337		
EB THRU	3	4,800	547	0.114		1571	0.328			
EB RIGHT	0	0	1	0.000		2	0.000			
WB LEFT	1	1,600	4	0.003	* 0.379	14	0.009	* 0.337		
WB THRU	3	4,800	1466	0.305		890	0.185			
WB RIGHT	1	1,600	147	0.073		142	0.053			
<hr/>										
		RTOR	NORTH/SOUTH CRITICAL SUM			0.101	NORTH/SOUTH CRITICAL SUM		0.084	
		am pm	EAST/WEST CRITICAL SUM			0.379	EAST/WEST CRITICAL SUM		0.337	
NB	2	7	CLEARANCE INTERVAL			0.100	CLEARANCE INTERVAL		0.100	
SB	0	0								
EB	3	10	INTERSECTION ICU VALUE			0.580	INTERSECTION ICU VALUE		0.521	
WB	30	57								
			AM INTERSECTION LOS			A	PM INTERSECTION LOS			A

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 2: W OCEAN BL & PACIFIC AV
EXISTING + PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	Project	TOTAL	AM PEAK HOUR				PM PEAK HOUR			
						V/C	CRITICAL PAIR	EXISTING	Project	TOTAL	V/C	CRITICAL PAIR	
NB LEFT	0	0	3	0	3	0.000	*	10	0	10	0.000	*	
NB THRU	1	1600	2	0	2	0.004		4	0	4	0.012		
NB RIGHT	0	0	2	0	2	0.000		5	0	5	0.000		
							0.101						0.084
SB LEFT	1.5	2,400	60	2	62	0.026		113	4	117	0.049		
SB THRU	0.5	800	2	0	2	0.000		1	0	1	0.000		
SB RIGHT	1	1,600	162	0	162	0.101	*	135	0	135	0.084	*	

EB LEFT	1	1,600	118	0	118	0.074	*	176	0	176	0.110		
EB THRU	3	4,800	547	12	559	0.117		1571	18	1589	0.331		
EB RIGHT	0	0	1	0	1	0.000		2	0	2	0.000		
							0.381						0.340
WB LEFT	1	1,600	4	0	4	0.003		14	0	14	0.009	*	
WB THRU	3	4800	1466	9	1475	0.307	*	890	15	905	0.189		
WB RIGHT	1	1,600	147	2	149	0.074		142	3	145	0.054		

	RTOR			NORTH/SOUTH CRITICAL SUM				0.101	NORTH/SOUTH CRITICAL SUM				0.084
	am	pm	EAST/WEST CRITICAL SUM				0.381	EAST/WEST CRITICAL SUM				0.340	
NB	2	7	CLEARANCE INTERVAL				0.100	CLEARANCE INTERVAL				0.100	
SB	0	0											
EB	3	10	INTERSECTION ICU VALUE				0.582	INTERSECTION ICU VALUE				0.524	
WB	31	59											
	AM INTERSECTION LOS					A	PM INTERSECTION LOS					A	
	AM IMPACT					0.002	PM IMPACT					0.003	

RTOR = Right turn on red reduction = 0.5 * corresponding Left



INTERSECTION 2: W OCEAN BL & PACIFIC AV
EXISTING + AMBIENT+ CUMULATIVE PROJECT

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 2: W OCEAN BL & PACIFIC AV
EXISTING + AMBIENT+ CUMULATIVE PROJECT + PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	AM PEAK HOUR				PM PEAK HOUR							
								V/C	CRITICAL PAIR	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	V/C	CRITICAL PAIR			
NB LEFT	0	0	3	0	13	0	16	0.000	*		10	1	13	0	24	0.000	*		
NB THRU	1	1600	2	0	38	0	40	0.060			4	0	39	0	43	0.069			
NB RIGHT	0	0	2	0	38	0	40	0.000			5	0	39	0	44	0.000			
									0.107								0.121		
SB LEFT	1.5	2,400	60	3	1	2	66	0.028			113	6	2	4	125	0.052	*		
SB THRU	0.5	800	2	0	30	0	32	0.000			1	0	54	0	55	0.000			
SB RIGHT	1	1,600	162	8	1	0	171	0.107	*		135	7	3	0	145	0.091			

EB LEFT	1	1,600	118	6	0	0	124	0.078	*		176	9	0	0	185	0.116			
EB THRU	3	4,800	547	28	103	12	690	0.146			1571	80	161	18	1830	0.385	*		
EB RIGHT	0	0	1	0	10	0	11	0.000			2	0	18	0	20	0.000			
									0.424								0.446		
WB LEFT	1	1,600	4	0	39	0	43	0.027			14	1	83	0	98	0.061	*		
WB THRU	3	4800	1466	75	109	9	1659	0.346	*		890	45	132	15	1082	0.225			
WB RIGHT	1	1,600	147	7	6	2	162	0.081			142	7	5	3	157	0.059			

RTOR				NORTH/SOUTH CRITICAL SUM						0.107		NORTH/SOUTH CRITICAL SUM						0.121	
am				EAST/WEST CRITICAL SUM						0.424		EAST/WEST CRITICAL SUM						0.446	
pm				CLEARANCE INTERVAL						0.100		CLEARANCE INTERVAL						0.100	
NB	22	49																	
SB	0	0																	
EB	16	24	INTERSECTION ICU VALUE						0.631		INTERSECTION ICU VALUE						0.667		
WB	33	62																	
								AM INTERSECTION LOS		B		PM INTERSECTION LOS						B	
								AM IMPACT		0.002		PM IMPACT						0.002	

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 3: BROADWAY & PINE AVENUE
EXISTING CONDITION (2018)

MOVEMENT	NO. OF LANES	CAPACITY	AM PEAK HOUR			PM PEAK HOUR			CRITICAL PAIR		
			Traffic VOLUMES	V/C		Traffic VOLUMES	V/C				
NB LEFT	0	0	0	0.000	* 0.109	0	0.000	* 0.197			
NB THRU	1	1600	78	0.071		160	0.158				
NB RIGHT	0	0	35	0.000		93	0.000				
SB LEFT	1	1,600	61	0.038	* 0.166	62	0.039	* 0.318			
SB THRU	1	1600	139	0.087		129	0.081				
SB RIGHT	0	0	0	0.000		0	0.000				
<hr/>											
EB LEFT	1	1,600	23	0.014	* 0.166	29	0.018	* 0.318			
EB THRU	2	3,200	450	0.166		946	0.318				
EB RIGHT	0	0	82	0.000		72	0.000				
WB LEFT	0	0	0	0.000	* 0.166	0	0.000	* 0.318			
WB THRU	0	0	0	0.000		0	0.000				
WB RIGHT	0	0	0	0.000		0	0.000				
<hr/>											
RTOR			NORTH/SOUTH CRITICAL SUM			0.109	NORTH/SOUTH CRITICAL SUM			0.197	
am pm			EAST/WEST CRITICAL SUM			0.166	EAST/WEST CRITICAL SUM			0.318	
NB	0	0	CLEARANCE INTERVAL			0.100	CLEARANCE INTERVAL			0.100	
SB	0	0									
EB	0	0	INTERSECTION ICU VALUE			0.375	INTERSECTION ICU VALUE			0.615	
WB	31	31									
AM INTERSECTION LOS						A	PM INTERSECTION LOS				B

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 3: BROADWAY & PINE AVENUE
EXISTING + PROJECT

MOVEMENT	AM PEAK HOUR						PM PEAK HOUR						
	NO. OF LANES	CAPACITY	EXISTING	Project	TOTAL	V/C	CRITICAL PAIR	EXISTING	Project	TOTAL	V/C	CRITICAL PAIR	
NB LEFT	0	0	0	0	0	0.000	0.112	0	0	0	0.000	0.205	
NB THRU	1	1600	78	3	81	0.074		*	160	6	166		0.166
NB RIGHT	0	0	35	3	38	0.000			93	6	99		0.000
SB LEFT	1	1,600	61	0	61	0.038	*	62	0	62	0.039	*	
SB THRU	1	1,600	139	5	144	0.090		129	7	136	0.085		
SB RIGHT	0	0	0	0	0	0.000		0	0	0	0.000		

EB LEFT	1	1,600	23	0	23	0.014	0.168	29	0	29	0.018	0.320	
EB THRU	2	3,200	450	0	450	0.168		946	0	946	0.320		
EB RIGHT	0	0	82	5	87	0.000		72	7	79	0.000		
WB LEFT	0	0	0	0	0	0.000	*	0	0	0	0.000	*	
WB THRU	0	0	0	0	0	0.000		0	0	0	0.000		
WB RIGHT	0	0	0	0	0	0.000		0	0	0	0.000		

RTOR				NORTH/SOUTH CRITICAL SUM				0.112	NORTH/SOUTH CRITICAL SUM				0.205
am pm				EAST/WEST CRITICAL SUM				0.168	EAST/WEST CRITICAL SUM				0.320
NB	0	0	CLEARANCE INTERVAL				0.100	CLEARANCE INTERVAL				0.100	
SB	0	0					-----					-----	
EB	0	0	INTERSECTION ICU VALUE				0.380	INTERSECTION ICU VALUE				0.625	
WB	31	31											
AM INTERSECTION LOS							A	PM INTERSECTION LOS					B
AM IMPACT							0.005	PM IMPACT					0.010

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 3: BROADWAY & PINE AVENUE
EXISTING + AMBIENT+ CUMULATIVE PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT GROWTH	RELATED PROJECT	TOTAL	AM PEAK HOUR				PM PEAK HOUR				
							V/C	CRITICAL PAIR	EXISTING	AMBIENT GROWTH	RELATED PROJECT	TOTAL	V/C	CRITICAL PAIR	
NB LEFT	0	0	0	0	0	0	0.000	*	0	0	0	0	0.000	*	
NB THRU	1	1600	78	4	4	86	0.078		160	8	6	174	0.175		
NB RIGHT	0	0	35	2	2	39	0.000		93	5	8	106	0.000		
								0.118						0.216	
SB LEFT	1	1,600	61	3	0	64	0.040	*	62	3	0	65	0.041	*	
SB THRU	1	1,600	139	7	10	156	0.098		129	7	12	148	0.092		
SB RIGHT	0	0	0	0	0	0	0.000		0	0	0	0	0.000		
<hr/>															
EB LEFT	1	1,600	23	1	26	50	0.031	*	29	1	18	48	0.030	*	
EB THRU	2	3,200	450	23	79	552	0.206		946	48	117	1111	0.379		
EB RIGHT	0	0	82	4	22	108	0.000		72	4	27	103	0.000		
								0.206						0.379	
WB LEFT	0	0	0	0	0	0	0.000	*	0	0	0	0	0.000	*	
WB THRU	0	0	0	0	0	0	0.000		0	0	0	0	0.000		
WB RIGHT	0	0	0	0	0	0	0.000		0	0	0	0	0.000		
<hr/>															
RTOR				NORTH/SOUTH CRITICAL SUM				0.118	NORTH/SOUTH CRITICAL SUM				0.216		
<u>am</u>				EAST/WEST CRITICAL SUM				0.206	EAST/WEST CRITICAL SUM				0.379		
<u>pm</u>				CLEARANCE INTERVAL				0.100	CLEARANCE INTERVAL				0.100		
NB	0	0													
SB	0	0													
EB	0	0													
WB	32	33													
AM INTERSECTION LOS							A	PM INTERSECTION LOS							B
AM IMPACT							0.049	PM IMPACT							0.080



INTERSECTION 3: BROADWAY & PINE AVENUE
EXISTING + AMBIENT+ CUMULATIVE PROJECT + PROJECT

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 4: OCEAN BL & PINE AV
EXISTING CONDITION (2018)

MOVEMENT	NO. OF LANES	CAPACITY	AM PEAK HOUR			PM PEAK HOUR			CRITICAL PAIR
			Traffic VOLUMES	V/C		Traffic VOLUMES	V/C		
NB LEFT	1	1,600	23	0.014	*	61	0.038	*	
NB THRU	1	1600	17	0.011		73	0.046		
NB RIGHT	1	1,600	36	-0.007		115	0.047		
									0.054
SB LEFT	0	0	11	0.000		88	0.000		0.132
SB THRU	1	1600	33	0.028		63	0.094	*	
SB RIGHT	1	1,600	64	0.040	*	111	0.069		
<hr/>									
EB LEFT	1	1,600	35	0.022	*	51	0.032		
EB THRU	3	4,800	484	0.115		1544	0.342	*	
EB RIGHT	0	0	69	0.000		99	0.000		
									0.340
WB LEFT	1	1,600	95	0.059		79	0.049	*	0.391
WB THRU	3	4,800	1525	0.318	*	853	0.178		
WB RIGHT	1	1,600	138	0.083		78	0.021		
<hr/>									
	RTOR		NORTH/SOUTH CRITICAL SUM			NORTH/SOUTH CRITICAL SUM			
	am	pm	EAST/WEST CRITICAL SUM			EAST/WEST CRITICAL SUM			
NB	48	40	CLEARANCE INTERVAL			CLEARANCE INTERVAL			
SB	0	0							
EB	23	61	INTERSECTION ICU VALUE			INTERSECTION ICU VALUE			
WB	6	44							
	AM INTERSECTION LOS				A	PM INTERSECTION LOS			
									B

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 4: OCEAN BL & PINE AV
EXISTING + PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	Project	TOTAL	AM PEAK HOUR				PM PEAK HOUR			
						V/C	CRITICAL PAIR	EXISTING	Project	TOTAL	V/C	CRITICAL PAIR	
NB LEFT	1	1,600	23	0	23	0.014	*	61	0	61	0.038	*	
NB THRU	1	1600	17	7	24	0.015		73	12	85	0.053		
NB RIGHT	1	1600	36	2	38	-0.006		115	4	119	0.050		
							0.054					0.141	
SB LEFT	0	0	11	10	21	0.000		88	14	102	0.000		
SB THRU	1	1,600	33	0	33	0.034		63	0	63	0.103	*	
SB RIGHT	1	1,600	64	0	64	0.040	*	111	0	111	0.069		
<hr/>													
EB LEFT	1	1,600	35	0	35	0.022	*	51	0	51	0.032		
EB THRU	3	4,800	484	15	499	0.118		1544	22	1566	0.347		
EB RIGHT	0	0	69	0	69	0.000		99	0	99	0.000		
							0.342					0.396	
WB LEFT	1	1,600	95	0	95	0.059		79	0	79	0.049	*	
WB THRU	3	4800	1525	10	1535	0.320	*	853	18	871	0.181		
WB RIGHT	1	1,600	138	0	138	0.080		78	0	78	0.017		
<hr/>													
RTOR				NORTH/SOUTH CRITICAL SUM				0.054	NORTH/SOUTH CRITICAL SUM				0.141
am				EAST/WEST CRITICAL SUM				0.342	EAST/WEST CRITICAL SUM				0.396
pm				CLEARANCE INTERVAL				0.100	CLEARANCE INTERVAL				0.100
NB	48	40											
SB	0	0											
EB	23	61	INTERSECTION ICU VALUE				0.496	INTERSECTION ICU VALUE				0.637	
WB	11	51											
AM INTERSECTION LOS						A	PM INTERSECTION LOS						B
AM IMPACT						0.002	PM IMPACT						0.014

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 4: OCEAN BL & PINE AV
EXISTING + AMBIENT+ CUMULATIVE PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT GROWTH	RELATED PROJECT	TOTAL	AM PEAK HOUR			PM PEAK HOUR			CRITICAL PAIR		
							V/C	CRITICAL PAIR	EXISTING	AMBIENT GROWTH	RELATED PROJECT	TOTAL		V/C	
NB LEFT	1	1,600	23	1	0	24	0.015	*	61	3	0	64	0.040	*	
NB THRU	1	1600	17	1	11	29	0.018		73	4	21	98	0.061		
NB RIGHT	1	1600	36	2	1	39	-0.008		115	6	2	123	0.051		
								0.060						0.159	
SB LEFT	0	0	11	1	8	20	0.000		88	4	14	106	0.000		
SB THRU	1	1,600	33	2	17	52	0.045	*	63	3	17	83	0.119	*	
SB RIGHT	1	1,600	64	3	2	69	0.043		111	6	2	119	0.074		
EB LEFT	1	1,600	35	2	4	41	0.025	*	51	3	7	61	0.038		
EB THRU	3	4,800	484	25	192	701	0.161		1544	79	233	1856	0.408	*	
EB RIGHT	0	0	69	4	0	73	0.000		99	5	0	104	0.000		
								0.393						0.461	
WB LEFT	1	1,600	95	5	3	103	0.064		79	4	1	84	0.053	*	
WB THRU	3	4800	1525	78	163	1766	0.368	*	853	44	256	1153	0.240		
WB RIGHT	1	1,600	138	7	9	154	0.090		78	4	8	90	0.023		
RTOR				NORTH/SOUTH CRITICAL SUM				0.060		NORTH/SOUTH CRITICAL SUM				0.159	
am				EAST/WEST CRITICAL SUM				0.393		EAST/WEST CRITICAL SUM				0.461	
pm				CLEARANCE INTERVAL				0.100		CLEARANCE INTERVAL				0.100	
NB	51	42													
SB	0	0													
EB	24	64	INTERSECTION ICU VALUE				0.553		INTERSECTION ICU VALUE				0.720		
WB	10	53													
AM INTERSECTION LOS							A		PM INTERSECTION LOS						
AM IMPACT							0.059		PM IMPACT						

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 4: OCEAN BL & PINE AV
EXISTING + AMBIENT+ CUMULATIVE PROJECT + PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	AM PEAK HOUR				PM PEAK HOUR							
								V/C	CRITICAL PAIR	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	V/C	CRITICAL PAIR			
NB LEFT	1	1,600	23	1	0	0	24	0.015	*		61	3	0	0	64	0.040	*		
NB THRU	1	1600	17	1	11	7	36	0.022			73	4	21	12	110	0.069			
NB RIGHT	1	1600	36	2	1	2	41	-0.007			115	6	2	4	127	0.053			
									0.066								0.167		
SB LEFT	0	0	11	1	8	10	30	0.000			88	4	14	14	120	0.000			
SB THRU	1	1,600	33	2	17	0	52	0.051	*		63	3	17	0	83	0.127	*		
SB RIGHT	1	1,600	64	3	2	0	69	0.043			111	6	2	0	119	0.074			
<hr/>																			
EB LEFT	1	1,600	35	2	4	0	41	0.025	*		51	3	7	0	61	0.038			
EB THRU	3	4,800	484	25	192	15	716	0.164			1544	79	233	22	1878	0.413	*		
EB RIGHT	0	0	69	4	0	0	73	0.000			99	5	0	0	104	0.000			
									0.395								0.466		
WB LEFT	1	1,600	95	5	3	0	103	0.064			79	4	1	0	84	0.053	*		
WB THRU	3	4800	1525	78	163	10	1776	0.370	*		853	44	256	18	1171	0.244			
WB RIGHT	1	1,600	138	7	9	0	154	0.087			78	4	8	0	90	0.019			
<hr/>																			
RTOR				NORTH/SOUTH CRITICAL SUM						0.066		NORTH/SOUTH CRITICAL SUM						0.167	
am pm				EAST/WEST CRITICAL SUM						0.395		EAST/WEST CRITICAL SUM						0.466	
NB	51	42	CLEARANCE INTERVAL						0.100		CLEARANCE INTERVAL						0.100		
SB	0	0																	
EB	24	64	INTERSECTION ICU VALUE						0.561		INTERSECTION ICU VALUE						0.733		
WB	15	60																	
								AM INTERSECTION LOS		A		PM INTERSECTION LOS						C	
								AM IMPACT		0.008		PM IMPACT						0.013	

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 5: SEASIDE WAY & PINE AVENUE
EXISTING CONDITION (2018)

MOVEMENT	NO. OF LANES	CAPACITY	AM PEAK HOUR			PM PEAK HOUR			CRITICAL PAIR	
			Traffic VOLUMES	V/C		Traffic VOLUMES	V/C			
NB LEFT	1	1,600	7	0.004		6	0.004	*		
NB THRU	2	3,200	38	0.012		132	0.041			
NB RIGHT	1	1,600	45	0.023	*	20	0.008			
									0.067	
SB LEFT	1	1,600	70	0.044	*	8	0.005			
SB THRU	2	3,200	70	0.038		170	0.070	*		
SB RIGHT	0	0	51	0.000		53	0.000			
<hr/>										
EB LEFT	1	1,600	18	0.011	*	68	0.043	*		
EB THRU	2	3,200	48	0.020		89	0.034			
EB RIGHT	0	0	16	0.000		19	0.000			
									0.035	
WB LEFT	1	1,600	17	0.011		14	0.009			
WB THRU	1	1,600	39	0.024	*	60	0.038	*		
WB RIGHT	1	1,600	24	0.000		47	0.027			
<hr/>										
	RTOR		NORTH/SOUTH CRITICAL SUM			0.067	NORTH/SOUTH CRITICAL SUM		0.074	
	am	pm	EAST/WEST CRITICAL SUM			0.035	EAST/WEST CRITICAL SUM		0.081	
NB	9	7	CLEARANCE INTERVAL			0.100	CLEARANCE INTERVAL		0.100	
SB	0	0								
EB	7	6	INTERSECTION ICU VALUE			0.202	INTERSECTION ICU VALUE		0.255	
WB	35	4								
AM INTERSECTION LOS					A	PM INTERSECTION LOS				A

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 5: SEASIDE WAY & PINE AVENUE
EXISTING + PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	Project	TOTAL	AM PEAK HOUR CRITICAL		EXISTING	Project	TOTAL	PM PEAK HOUR CRITICAL	
						V/C	PAIR				V/C	PAIR
NB LEFT	1	1,600	7	0	7	0.004		6	0	6	0.004	*
NB THRU	2	3,200	38	2	40	0.013		132	4	136	0.043	
NB RIGHT	1	1600	45	0	45	0.022	*	20	0	20	0.007	
							0.066					0.074
SB LEFT	1	1,600	70	0	70	0.044	*	8	0	8	0.005	
SB THRU	2	3,200	70	0	70	0.038		170	0	170	0.070	*
SB RIGHT	0	0	51	0	51	0.000		53	0	53	0.000	
EB LEFT	1	1,600	18	0	18	0.011	*	68	0	68	0.043	*
EB THRU	2	3,200	48	0	48	0.020		89	0	89	0.034	
EB RIGHT	0	0	16	0	16	0.000		19	0	19	0.000	
							0.036					0.081
WB LEFT	1	1,600	17	2	19	0.012		14	3	17	0.011	
WB THRU	1	1600	39	0	39	0.025	*	60	0	60	0.038	*
WB RIGHT	1	1,600	24	7	31	0.000		47	12	59	0.034	
						RTOR		NORTH/SOUTH CRITICAL SUM		NORTH/SOUTH CRITICAL SUM		
						am	pm					
NB	10					10	9					
SB	0					0	0					
EB	7					7	6					
WB	35					35	4					
						INTERSECTION ICU VALUE		INTERSECTION ICU VALUE		INTERSECTION ICU VALUE		
						AM INTERSECTION LOS		AM INTERSECTION LOS		PM INTERSECTION LOS		
						AM IMPACT		AM IMPACT		PM IMPACT		

RTOR = Right turn on red reduction = 0.5 * corresponding Left



INTERSECTION 5: SEASIDE WAY & PINE AVENUE
EXISTING + AMBIENT+ CUMULATIVE PROJECT

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 5: SEASIDE WAY & PINE AVENUE
EXISTING + AMBIENT+ CUMULATIVE PROJECT + PROJECT

MOVEMENT	NO. OF LANES CAPACITY		EXISTING	AM PEAK HOUR					PM PEAK HOUR								
				AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	V/C	CRITICAL PAIR	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	V/C	CRITICAL PAIR	
NB LEFT	1	1,600	7	0	0	0	7	0.005	0.069	6	0	0	0	6	0.004	*	
NB THRU	2	3,200	38	2	32	2	74	0.023		132	7	59	4	202	0.063		
NB RIGHT	1	1600	45	2	0	0	47	0.023		20	1	0	0	21	0.008		
SB LEFT	1	1,600	70	4	0	0	74	0.046	0.065	8	0	0	0	8	0.005		
SB THRU	2	3,200	70	4	46	0	120	0.054		170	9	44	0	223	0.087	*	
SB RIGHT	0	0	51	3	0	0	54	0.000		53	3	0	0	56	0.000		
EB LEFT	1	1,600	18	1	0	0	19	0.012	0.065	68	3	0	0	71	0.045	*	
EB THRU	2	3,200	48	2	31	0	81	0.031		89	5	42	0	136	0.049		
EB RIGHT	0	0	16	1	0	0	17	0.000		19	1	0	0	20	0.000		
WB LEFT	1	1,600	17	1	0	2	20	0.012	0.100	14	1	0	3	18	0.011		
WB THRU	1	1600	39	2	42	0	83	0.053		60	3	35	0	98	0.061	*	
WB RIGHT	1	1,600	24	1	0	7	32	0.000		47	2	0	12	61	0.036		
RTOR				NORTH/SOUTH CRITICAL SUM					0.069	NORTH/SOUTH CRITICAL SUM					0.091		
am pm				EAST/WEST CRITICAL SUM					0.065	EAST/WEST CRITICAL SUM					0.106		
				CLEARANCE INTERVAL					0.100	CLEARANCE INTERVAL					0.100		
NB	10	9															
SB	0	0															
EB	7	6	INTERSECTION ICU VALUE					0.234	INTERSECTION ICU VALUE					0.297			
WB	37	4															
AM INTERSECTION LOS								A	PM INTERSECTION LOS								A
AM IMPACT								0.000	PM IMPACT								0.000



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 7A: E OCEAN BL & LOCUST AV
EXISTING CONDITION (2018)

MOVEMENT	NO. OF LANES	CAPACITY	AM PEAK HOUR			PM PEAK HOUR			CRITICAL PAIR		
			Traffic VOLUMES	V/C	CRITICAL PAIR	Traffic VOLUMES	V/C				
NB LEFT	0	0	0	0.000	*	0.000	0	0.000	*		
NB THRU	1	1600	0	0.000	*		0	0.000	*		
NB RIGHT	0	0	0	0.000	*		0	0.000	*		
SB LEFT	0	0	0	0.000	*		0	0.000	*		
SB THRU	0	0	0	0.000	*		0	0.000	*		
SB RIGHT	0	0	0	0.000	*		0	0.000	*		
<hr/>											
EB LEFT	0	0	0	0.000	*	0.384	0	0.000			
EB THRU	3	4,800	550	0.115			1764	0.368	*		
EB RIGHT	0	0	0	0.000			0	0.000			
WB LEFT	1	1,600	0	0.000			0	0.000	*		
WB THRU	3	4,800	1841	0.384	*		1000	0.208			
WB RIGHT	0	0	0	0.000			0	0.000			
<hr/>											
		RTOR	NORTH/SOUTH CRITICAL SUM			0.000	NORTH/SOUTH CRITICAL SUM			0.000	
		am pm	EAST/WEST CRITICAL SUM			0.384	EAST/WEST CRITICAL SUM			0.368	
NB	0	0	CLEARANCE INTERVAL			0.100	CLEARANCE INTERVAL			0.100	
SB	0	0									
EB	0	0	INTERSECTION ICU VALUE			0.484	INTERSECTION ICU VALUE			0.468	
WB	0	0									
AM INTERSECTION LOS						A	PM INTERSECTION LOS				A

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 7A: E OCEAN BL & LOCUST AV
EXISTING + PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	Project	TOTAL	AM PEAK HOUR				PM PEAK HOUR			
						V/C	CRITICAL		V/C	CRITICAL			
							PAIR	EXISTING		PAIR	EXISTING		
NB LEFT	0	0	0	10	10	0.000		0	18	18	0.000		
NB THRU	1	1600	0	0	0	0.027	*	0	0	0	0.048	*	
NB RIGHT	0	0	0	33	33	0.000		0	58	58	0.000		
							0.027						0.048
SB LEFT	0	0	0	0	0	0.000	*	0	0	0	0.000	*	
SB THRU	0	0	0	0	0	0.000		0	0	0	0.000		
SB RIGHT	0	0	0	0	0	0.000		0	0	0	0.000		
EB LEFT	0	0	0	0	0	0.000	*	0	0	0	0.000		
EB THRU	3	4,800	550	25	575	0.120		1764	36	1800	0.376		
EB RIGHT	0	0	0	2	2	0.000		0	4	4	0.000		
							0.384						0.397
WB LEFT	1	1,600	0	22	22	0.014		0	33	33	0.021	*	
WB THRU	3	4800	1841	0	1841	0.384	*	1000	0	1000	0.208		
WB RIGHT	0	0	0	0	0	0.000		0	0	0	0.000		
	RTOR			NORTH/SOUTH CRITICAL SUM				0.027	NORTH/SOUTH CRITICAL SUM				0.048
	am	pm	EAST/WEST CRITICAL SUM				0.384	EAST/WEST CRITICAL SUM				0.397	
NB	11	17	CLEARANCE INTERVAL				0.100	CLEARANCE INTERVAL				0.100	
SB	0	0											
EB	10	18	INTERSECTION ICU VALUE				0.511	INTERSECTION ICU VALUE				0.545	
WB	0	0											
					AM INTERSECTION LOS		A	PM INTERSECTION LOS				A	
					AM IMPACT		0.027	PM IMPACT				0.077	

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 7A: E OCEAN BL & LOCUST AV
EXISTING + AMBIENT+ CUMULATIVE PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT GROWTH	RELATED PROJECT	TOTAL	AM PEAK HOUR			PM PEAK HOUR			CRITICAL PAIR		
							V/C	CRITICAL PAIR	EXISTING	AMBIENT GROWTH	RELATED PROJECT	TOTAL		V/C	
NB LEFT	0	0	0	0	18	18	0.000	0.033	0	0	10	10	0.000	*	
NB THRU	1	1600	0	0	0	0	0.033		0	0	0	0	0.028		
NB RIGHT	0	0	0	0	34	34	0.000		0	0	35	35	0.000		
SB LEFT	0	0	0	0	0	0	0.000	0.033	0	0	0	0	0.000	*	
SB THRU	0	0	0	0	0	0	0.000		0	0	0	0	0.000		
SB RIGHT	0	0	0	0	0	0	0.000		0	0	0	0	0.000		
EB LEFT	0	0	0	0	0	0	0.000	0.435	0	0	0	0	0.000	*	
EB THRU	3	4,800	550	28	175	753	0.158		1764	90	214	2068	0.435		
EB RIGHT	0	0	0	0	7	7	0.000		0	0	22	22	0.000		
WB LEFT	1	1,600	0	0	5	5	0.003	0.435	0	0	18	18	0.011	*	
WB THRU	3	4800	1841	94	151	2086	0.435		1000	51	249	1300	0.271		
WB RIGHT	0	0	0	0	0	0	0.000		0	0	0	0	0.000		
RTOR				NORTH/SOUTH CRITICAL SUM				0.033	NORTH/SOUTH CRITICAL SUM				0.028		
am				EAST/WEST CRITICAL SUM				0.435	EAST/WEST CRITICAL SUM				0.446		
pm				CLEARANCE INTERVAL				0.100	CLEARANCE INTERVAL				0.100		
NB	3	9													
SB	0	0													
EB	18	10	INTERSECTION ICU VALUE				0.568	INTERSECTION ICU VALUE				0.574			
WB	0	0													
AM INTERSECTION LOS							A	PM INTERSECTION LOS							A
AM IMPACT							0.084	PM IMPACT							0.100



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 7A: E OCEAN BL & LOCUST AV
EXISTING + AMBIENT+ CUMULATIVE PROJECT + PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	AM PEAK HOUR				PM PEAK HOUR					
								V/C	CRITICAL PAIR	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	V/C	CRITICAL PAIR	
NB LEFT	0	0	0	0	18	10	28	0.000	0.059	0	0	10	18	28	0.000	*	
NB THRU	1	1600	0	0	0	0	0	0.059		0	0	0	0	0	0.076		
NB RIGHT	0	0	0	0	34	33	67	0.000		0	0	35	58	93	0.000		
SB LEFT	0	0	0	0	0	0	0	0.000	0.076	0	0	0	0	0	0.000	*	
SB THRU	0	0	0	0	0	0	0	0.000		0	0	0	0	0	0.000		
SB RIGHT	0	0	0	0	0	0	0	0.000		0	0	0	0	0	0.000		
<hr/>																	
EB LEFT	0	0	0	0	0	0	0	0.000	0.435	0	0	0	0	0	0.000	*	
EB THRU	3	4,800	550	28	175	25	778	0.164		1764	90	214	36	2104	0.444		
EB RIGHT	0	0	0	0	7	2	9	0.000		0	0	22	4	26	0.000		
WB LEFT	1	1,600	0	0	5	22	27	0.017	0.476	0	0	18	33	51	0.032	*	
WB THRU	3	4800	1841	94	151	0	2086	0.435		1000	51	249	0	1300	0.271		
WB RIGHT	0	0	0	0	0	0	0	0.000		0	0	0	0	0	0.000		
<hr/>																	
RTOR				NORTH/SOUTH CRITICAL SUM					0.059	NORTH/SOUTH CRITICAL SUM					0.076		
am				EAST/WEST CRITICAL SUM					0.435	EAST/WEST CRITICAL SUM					0.476		
pm				CLEARANCE INTERVAL					0.100	CLEARANCE INTERVAL					0.100		
NB	14	26															
SB	0	0															
EB	28	28	INTERSECTION ICU VALUE					0.594	INTERSECTION ICU VALUE					0.652			
WB	0	0															
AM INTERSECTION LOS								A	PM INTERSECTION LOS								B
AM IMPACT								0.026	PM IMPACT								0.078



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 7B: E OCEAN BL & LOCUST AV (LOCUST MODIFIED TO ONE-WAY)
EXISTING CONDITION (2018)

MOVEMENT	NO. OF LANES	CAPACITY	AM PEAK HOUR			PM PEAK HOUR			CRITICAL PAIR		
			Traffic VOLUMES	V/C		Traffic VOLUMES	V/C				
NB LEFT	0	0	0	0.000	*	0.000	0	0.000	*	0.000	
NB THRU	1	1600	0	0.000	*		0	0.000	*		
NB RIGHT	0	0	0	0.000	*		0	0.000	*		
SB LEFT	0	0	0	0.000	*		0	0.000	*		
SB THRU	0	0	0	0.000	*		0	0.000	*		
SB RIGHT	0	0	0	0.000	*		0	0.000	*		

EB LEFT	0	0	0	0.000	*	0.384	0	0.000		0.368	
EB THRU	3	4,800	550	0.115			1764	0.368	*		
EB RIGHT	0	0	0	0.000			0	0.000			
WB LEFT	1	1,600	0	0.000			0	0.000	*		
WB THRU	3	4,800	1841	0.384	*		1000	0.208			
WB RIGHT	0	0	0	0.000			0	0.000			

	RTOR		NORTH/SOUTH CRITICAL SUM			0.000	NORTH/SOUTH CRITICAL SUM			0.000	
	am	pm	EAST/WEST CRITICAL SUM			0.384	EAST/WEST CRITICAL SUM			0.368	
NB	0	0	CLEARANCE INTERVAL			0.100	CLEARANCE INTERVAL			0.100	
SB	0	0									
EB	0	0	INTERSECTION ICU VALUE			0.484	INTERSECTION ICU VALUE			0.468	
WB	0	0									
AM INTERSECTION LOS						A	PM INTERSECTION LOS				A

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 7B: E OCEAN BL & LOCUST AV (LOCUST MODIFIED TO ONE-WAY)
EXISTING + PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	Project	TOTAL	AM PEAK HOUR				PM PEAK HOUR			
						V/C	CRITICAL PAIR	EXISTING	Project	TOTAL	V/C	CRITICAL PAIR	
NB LEFT	0	0	0	10	10	0.000	*	0	18	18	0.000	*	
NB THRU	1	1600	0	0	0	0.035		0	0	0	0.028		
NB RIGHT	0	0	0	46	46	0.000		0	82	27	0.000		
							0.035						0.028
SB LEFT	0	0	0	0	0	0.000	*	0	0	0	0.000	*	
SB THRU	0	0	0	0	0	0.000		0	0	0	0.000		
SB RIGHT	0	0	0	0	0	0.000		0	0	0	0.000		
EB LEFT	0	0	0	0	0	0.000	*	0	0	0	0.000		
EB THRU	3	4,800	550	27	577	0.120		1764	40	1804	0.376		
EB RIGHT	0	0	0	0	0	0.000		0	0	0	0.000		
							0.388						0.376
WB LEFT	0	0	0	22	22	0.000	*	0	33	33	0.000	*	
WB THRU	3	4800	1841	0	1841	0.388		1000	0	1000	0.215		
WB RIGHT	0	0	0	0	0	0.000		0	0	0	0.000		
	RTOR			NORTH/SOUTH CRITICAL SUM				0.035	NORTH/SOUTH CRITICAL SUM				0.028
	am	pm	EAST/WEST CRITICAL SUM				0.388	EAST/WEST CRITICAL SUM				0.376	
NB	11	17	CLEARANCE INTERVAL				0.100	CLEARANCE INTERVAL				0.100	
SB	0	0											
EB	10	18	INTERSECTION ICU VALUE				0.523	INTERSECTION ICU VALUE				0.504	
WB	0	0											
					AM INTERSECTION LOS		A	PM INTERSECTION LOS				A	
					AM IMPACT		0.039	PM IMPACT				0.036	

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 7B: E OCEAN BL & LOCUST AV (LOCUST MODIFIED TO ONE-WAY)
EXISTING + AMBIENT+ CUMULATIVE PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT GROWTH	RELATED PROJECT	TOTAL	AM PEAK HOUR			PM PEAK HOUR			CRITICAL PAIR		
							V/C	CRITICAL PAIR	EXISTING	AMBIENT GROWTH	RELATED PROJECT	TOTAL		V/C	
NB LEFT	0	0	0	0	18	18	0.000	0.033	0	0	10	10	0.000	*	
NB THRU	1	1600	0	0	0	0	0.033		0	0	0	0	0.028		
NB RIGHT	0	0	0	0	34	34	0.000		0	0	34	34	0.000		
SB LEFT	0	0	0	0	0	0	0.000	0.033	0	0	0	0	0.000	*	
SB THRU	0	0	0	0	0	0	0.000		0	0	0	0	0.000		
SB RIGHT	0	0	0	0	0	0	0.000		0	0	0	0	0.000		
EB LEFT	0	0	0	0	0	0	0.000	0.436	0	0	0	0	0.000	*	
EB THRU	3	4,800	550	28	182	760	0.158		1764	90	236	2090	0.435		
EB RIGHT	0	0	0	0	0	0	0.000		0	0	0	0	0.000		
WB LEFT	1	1,600	0	0	0	0	0.000	0.436	0	0	0	0	0.000	*	
WB THRU	3	4800	1841	94	156	2091	0.436		1000	51	258	1309	0.273		
WB RIGHT	0	0	0	0	0	0	0.000		0	0	0	0	0.000		
RTOR				NORTH/SOUTH CRITICAL SUM				0.033	NORTH/SOUTH CRITICAL SUM				0.028		
am				EAST/WEST CRITICAL SUM				0.436	EAST/WEST CRITICAL SUM				0.435		
pm				CLEARANCE INTERVAL				0.100	CLEARANCE INTERVAL				0.100		
NB	0	0													
SB	0	0													
EB	18	10	INTERSECTION ICU VALUE				0.569	INTERSECTION ICU VALUE				0.563			
WB	0	0													
AM INTERSECTION LOS							A	PM INTERSECTION LOS							A
AM IMPACT							0.085	PM IMPACT							0.095



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 7B: E OCEAN BL & LOCUST AV (LOCUST MODIFIED TO ONE-WAY)
EXISTING + AMBIENT+ CUMULATIVE PROJECT + PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	AM PEAK HOUR				PM PEAK HOUR					
								V/C	CRITICAL PAIR	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	V/C	CRITICAL PAIR	
NB LEFT	0	0	0	0	18	10	28	0.000	0.068	0	0	10	18	28	0.000	0.090	
NB THRU	1	1600	0	0	0	0	0	0.068		*	0	0	0	0	0		0.090
NB RIGHT	0	0	0	0	34	46	80	0.000		0	0	34	82	116	0.000		
SB LEFT	0	0	0	0	0	0	0	0.000	0.068	0	0	0	0	0	0.000	0.090	
SB THRU	0	0	0	0	0	0	0	0.000		*	0	0	0	0	0		0.000
SB RIGHT	0	0	0	0	0	0	0	0.000		0	0	0	0	0	0.000		
EB LEFT	0	0	0	0	0	0	0	0.000	0.440	0	0	0	0	0	0.000	0.444	
EB THRU	3	4,800	550	28	182	27	787	0.164		1764	90	236	40	2130	0.444		*
EB RIGHT	0	0	0	0	0	0	0	0.000		0	0	0	0	0	0.000		
WB LEFT	0	0	0	0	0	22	22	0.000	0.440	0	0	0	33	33	0.000	0.444	
WB THRU	3	4800	1841	94	156	0	2091	0.440		*	1000	51	258	0	1309		0.280
WB RIGHT	0	0	0	0	0	0	0	0.000		0	0	0	0	0	0.000		
RTOR				NORTH/SOUTH CRITICAL SUM					0.068		NORTH/SOUTH CRITICAL SUM					0.090	
am				EAST/WEST CRITICAL SUM					0.440		EAST/WEST CRITICAL SUM					0.444	
pm				CLEARANCE INTERVAL					0.100		CLEARANCE INTERVAL					0.100	
NB	11	17															
SB	0	0															
EB	28	28	INTERSECTION ICU VALUE					0.608		INTERSECTION ICU VALUE					0.634		
WB	0	0															
AM INTERSECTION LOS								B		PM INTERSECTION LOS					B		
AM IMPACT								0.039		PM IMPACT					0.071		



BREAKERS HOTEL - LONG BEACH
ICU CALCULATIONS

INTERSECTION 8: 3RD ST & LONG BEACH BL
EXISTING CONDITION (2018)

MOVEMENT	NO. OF LANES	CAPACITY	AM PEAK HOUR			PM PEAK HOUR			CRITICAL PAIR
			Traffic VOLUMES	V/C		Traffic VOLUMES	V/C		
NB LEFT	1	1,600	83	0.052	*	103	0.064	*	
NB THRU	2	3,200	156	0.049		301	0.094		
NB RIGHT	0	0	0	0.000		0	0.000		
									0.123
SB LEFT	0	0	0	0.000		0	0.000		
SB THRU	2	3,200	226	0.071	*	258	0.081	*	
SB RIGHT	1	1,600	55	0.034		71	0.044		
<hr/>									
EB LEFT	0	0	0	0.000	*	0	0.000	*	
EB THRU	0	0	0	0.000		0	0.000		
EB RIGHT	0	0	0	0.000		0	0.000		
									0.312
WB LEFT	1	1,600	46	0.029		39	0.024		
WB THRU	2	3,200	926	0.312	*	371	0.148	*	
WB RIGHT	0	0	72	0.000		102	0.000		
<hr/>									
	RTOR		NORTH/SOUTH CRITICAL SUM			NORTH/SOUTH CRITICAL SUM			
	am	pm	EAST/WEST CRITICAL SUM			EAST/WEST CRITICAL SUM			
NB	23	20	CLEARANCE INTERVAL			CLEARANCE INTERVAL			
SB	0	0							
EB	83	103	INTERSECTION ICU VALUE			INTERSECTION ICU VALUE			
WB	0	0							
			AM INTERSECTION LOS			PM INTERSECTION LOS			

RTOR = Right turn on red reduction = 0.5 * corresponding Left



INTERSECTION 8: 3RD ST & LONG BEACH BL
EXISTING + PROJECT

						AM PEAK HOUR		PM PEAK HOUR						
MOVEMENT	NO. OF		EXISTING	Project	TOTAL	V/C	*	CRITICAL		Project	TOTAL	V/C	*	CRITICAL
	LANES	CAPACITY						PAIR	EXISTING					
NB LEFT	1	1,600	83	3	86	0.054	*		103	6	109	0.068	*	
NB THRU	2	3,200	156	3	159	0.050			301	6	307	0.096		
NB RIGHT	0	0	0	0	0	0.000			0	0	0	0.000		
								0.126						0.151
SB LEFT	0	0	0	0	0	0.000			0	0	0	0.000		
SB THRU	2	3,200	226	5	231	0.072	*		258	7	265	0.083	*	
SB RIGHT	1	1,600	55	0	55	0.034			71	0	71	0.044		

EB LEFT	0	0	0	0	0	0.000	*		0	0	0	0.000	*	
EB THRU	0	0	0	0	0	0.000			0	0	0	0.000		
EB RIGHT	0	0	0	0	0	0.000			0	0	0	0.000		
								0.312						0.148
WB LEFT	1	1,600	46	5	51	0.032			39	7	46	0.029		
WB THRU	2	3,200	926	0	926	0.312	*		371	0	371	0.148	*	
WB RIGHT	0	0	72	0	72	0.000			102	0	102	0.000		

RTOR				NORTH/SOUTH CRITICAL SUM				0.126	NORTH/SOUTH CRITICAL SUM				0.151	
am pm				EAST/WEST CRITICAL SUM				0.312	EAST/WEST CRITICAL SUM				0.148	
				CLEARANCE INTERVAL				0.100	CLEARANCE INTERVAL				0.100	
NB	26	23												
SB	0	0												
EB	86	109	INTERSECTION ICU VALUE				0.538	INTERSECTION ICU VALUE				0.399		
WB	0	0												
				AM INTERSECTION LOS				A	PM INTERSECTION LOS				A	
				AM IMPACT				0.003	PM IMPACT				0.000	

RTOR = Right turn on red reduction = 0.5 * corresponding Left



INTERSECTION 8: 3RD ST & LONG BEACH BL
EXISTING + AMBIENT+ CUMULATIVE PROJECT

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 8: 3RD ST & LONG BEACH BL
EXISTING + AMBIENT+ CUMULATIVE PROJECT + PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	V/C	*	AM PEAK HOUR				PM PEAK HOUR				CRITICAL PAIR	
										CRITICAL PAIR	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	V/C			
NB LEFT	1	1,600	83	4	16	3	106	0.066	*		103	5	24	6	138	0.086	*		
NB THRU	2	3,200	156	8	4	3	171	0.053			301	15	2	6	324	0.101			
NB RIGHT	0	0	0	0	0	0	0	0.000			0	0	0	0	0	0.000			
										0.148							0.180		
SB LEFT	0	0	0	0	0	0	0	0.000			0	0	0	0	0	0.000			
SB THRU	2	3,200	226	12	19	5	262	0.082	*		258	13	23	7	301	0.094	*		
SB RIGHT	1	1,600	55	3	9	0	67	0.042			71	4	29	0	104	0.065			
<hr/>																			
EB LEFT	0	0	0	0	0	0	0	0.000	*		0	0	0	0	0	0.000	*		
EB THRU	0	0	0	0	0	0	0	0.000			0	0	0	0	0	0.000			
EB RIGHT	0	0	0	0	0	0	0	0.000			0	0	0	0	0	0.000			
										0.362							0.204		
WB LEFT	1	1,600	46	2	1	5	54	0.034			39	2	4	7	52	0.032			
WB THRU	2	3,200	926	47	110	0	1083	0.362	*		371	19	157	0	547	0.204	*		
WB RIGHT	0	0	72	4	0	0	76	0.000			102	5	0	0	107	0.000			
<hr/>																			
RTOR				NORTH/SOUTH CRITICAL SUM						0.148		NORTH/SOUTH CRITICAL SUM						0.180	
				EAST/WEST CRITICAL SUM						0.362		EAST/WEST CRITICAL SUM						0.204	
				CLEARANCE INTERVAL						0.100		CLEARANCE INTERVAL						0.100	
NB	27	26																	
SB	0	0																	
EB	106	138	INTERSECTION ICU VALUE						0.610		INTERSECTION ICU VALUE						0.484		
WB	0	0																	
								AM INTERSECTION LOS		B		PM INTERSECTION LOS						A	
								AM IMPACT		0.003		PM IMPACT						0.000	



BREAKERS HOTEL - LONG BEACH
ICU CALCULATIONS

INTERSECTION 9: LONG BEACH BL & E OCEAN BL
EXISTING CONDITION (2018)

MOVEMENT	NO. OF LANES	CAPACITY	AM PEAK HOUR			PM PEAK HOUR			CRITICAL PAIR
			Traffic VOLUMES	V/C		Traffic VOLUMES	V/C		
NB LEFT	0	0	0	0.000	*	0	0.000	*	
NB THRU	0	0	0	0.000		0	0.000		
NB RIGHT	0	0	0	0.000		0	0.000		
									0.064
SB LEFT	1.5	2,400	52	0.022		141	0.059		
SB THRU	0	0	0	0.000		0	0.000		
SB RIGHT	1.5	2,400	153	0.064	*	153	0.064	*	
<hr/>									
EB LEFT	1	1,600	75	0.047	*	141	0.088		
EB THRU	3	4,800	425	0.089		1699	0.354	*	
EB RIGHT	0	0	0	0.000		0	0.000		
									0.407
WB LEFT	0	0	0	0.000		0	0.000	*	
WB THRU	3	4,800	1729	0.360	*	822	0.171		
WB RIGHT	1	1,600	101	0.047		95	0.015		
<hr/>									
	RTOR		NORTH/SOUTH CRITICAL SUM			NORTH/SOUTH CRITICAL SUM			
	am	pm	EAST/WEST CRITICAL SUM			EAST/WEST CRITICAL SUM			
NB	0	0	CLEARANCE INTERVAL			CLEARANCE INTERVAL			
SB	0	0							
EB	0	0	INTERSECTION ICU VALUE			INTERSECTION ICU VALUE			
WB	26	71							
	AM INTERSECTION LOS				A	PM INTERSECTION LOS			

RTOR = Right turn on red reduction = 0.5 * corresponding Left



INTERSECTION 9: LONG BEACH BL & E OCEAN BL EXISTING + PROJECT

							AM PEAK HOUR		PM PEAK HOUR					
MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	Project	TOTAL	V/C	*	CRITICAL		Project	TOTAL	V/C	*	CRITICAL
								PAIR	EXISTING					
NB LEFT	0	0	0	0	0	0.000	*		0	0	0	0.000	*	
NB THRU	0	0	0	0	0	0.000			0	0	0	0.000		
NB RIGHT	0	0	0	0	0	0.000			0	0	0	0.000		
								0.068						0.070
SB LEFT	1.5	2,400	52	0	52	0.022			141	0	141	0.059		
SB THRU	0	0	0	0	0	0.000			0	0	0	0.000		
SB RIGHT	1.5	2,400	153	10	163	0.068	*		153	14	167	0.070	*	

EB LEFT	1	1,600	75	7	82	0.051	*		141	12	153	0.096		
EB THRU	3	4,800	425	9	434	0.090			1699	15	1714	0.357		
EB RIGHT	0	0	0	0	0	0.000			0	0	0	0.000		
								0.414						0.357
WB LEFT	0	0	0	0	0	0.000			0	0	0	0.000	*	
WB THRU	3	4800	1729	12	1741	0.363	*		822	18	840	0.175		
WB RIGHT	1	1,600	101	0	101	0.047			95	0	95	0.015		

RTOR				NORTH/SOUTH CRITICAL SUM				0.068	NORTH/SOUTH CRITICAL SUM				0.070	
am pm				EAST/WEST CRITICAL SUM				0.414	EAST/WEST CRITICAL SUM				0.357	
				CLEARANCE INTERVAL				0.100	CLEARANCE INTERVAL				0.100	
NB	0	0												
SB	0	0												
EB	0	0												
WB	26	71												
				INTERSECTION ICU VALUE				0.582	INTERSECTION ICU VALUE				0.527	
				AM INTERSECTION LOS				A	PM INTERSECTION LOS				A	
				AM IMPACT				0.011	PM IMPACT				0.009	

RTOR = Right turn on red reduction = 0.5 * corresponding Left



INTERSECTION 9: LONG BEACH BL & E OCEAN BL
EXISTING + AMBIENT+ CUMULATIVE PROJECT

RTOR = Right turn on red reduction = 0.5 * corresponding Left



INTERSECTION 9: LONG BEACH BL & E OCEAN BL
EXISTING + AMBIENT+ CUMULATIVE PROJECT + PROJECT

RTOR = Right turn on red reduction = 0.5 * corresponding Left



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 10: SHORELINEDR/ALAMITOS AV & E OCEAN BL
EXISTING CONDITION (2018)

MOVEMENT	NO. OF LANES	CAPACITY	AM PEAK HOUR			PM PEAK HOUR			CRITICAL PAIR
			Traffic VOLUMES	V/C	CRITICAL PAIR	Traffic VOLUMES	V/C		
NB LEFT	1	1,200	33	0.028	0.206	71	0.059	0.243	
NB THRU	2	2,400	89	0.037		320	0.133		
NB RIGHT	1	1,600	109	0.000		264	0.165		
SB LEFT	1	1,200	59	0.049	0.429	93	0.078	0.472	
SB THRU	3	3600	290	0.178		118	0.081		
SB RIGHT	0	0	349	0.000		174	0.000		
EB LEFT	1	1,200	124	0.103	0.429	279	0.233	0.472	
EB THRU	3	3600	411	0.114		1474	0.409		
EB RIGHT	1	1200	17	0.000		75	0.000		
WB LEFT	2	2,160	247	0.114	0.429	137	0.063	0.472	
WB THRU	3	3600	1120	0.326		591	0.190		
WB RIGHT	0	0	55	0.000		92	0.000		
NORTH/SOUTH CRITICAL SUM					0.206	NORTH/SOUTH CRITICAL SUM			0.243
EAST/WEST CRITICAL SUM					0.429	EAST/WEST CRITICAL SUM			0.472
CLEARANCE INTERVAL					0.100	CLEARANCE INTERVAL			0.100
INTERSECTION ICU VALUE					0.735	INTERSECTION ICU VALUE			0.815
AM INTERSECTION LOS					C	PM INTERSECTION LOS			D

Capacity conservatively reduced to 1,200 vehicles per hour per lane due to historical high LOS



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 10: SHORELINEDR/ALAMITOS AV & E OCEAN BL
EXISTING + PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	Project	TOTAL	AM PEAK HOUR			PM PEAK HOUR			
						V/C	CRITICAL PAIR	EXISTING	Project	TOTAL	V/C	CRITICAL PAIR
NB LEFT	1	1,200	33	2	35	0.029	*	71	4	75	0.063	
NB THRU	2	2,400	89	0	89	0.037		320	0	320	0.133	
NB RIGHT	1	1,600	109	0	109	0.068		264	0	264	0.165	*
							0.208					0.243
SB LEFT	1	1,200	59	0	59	0.049		93	0	93	0.078	*
SB THRU	3	3600	290	0	290	0.179	*	118	0	118	0.083	
SB RIGHT	0	0	349	5	354	0.000		174	7	181	0.000	

EB LEFT	1	1,200	124	3	127	0.106	*	279	6	285	0.238	
EB THRU	3	3600	411	3	414	0.115		1474	6	1480	0.411	
EB RIGHT	1	1200	17	2	19	0.016		75	3	78	0.000	
							0.434					0.474
WB LEFT	2	2,160	247	0	247	0.114		137	0	137	0.063	*
WB THRU	3	3600	1120	5	1125	0.328	*	591	7	598	0.192	
WB RIGHT	0	0	55	0	55	0.000		92	0	92	0.000	

				NORTH/SOUTH CRITICAL SUM				0.208	NORTH/SOUTH CRITICAL SUM			0.243
				EAST/WEST CRITICAL SUM				0.434	EAST/WEST CRITICAL SUM			0.474
				CLEARANCE INTERVAL				0.100	CLEARANCE INTERVAL			0.100
								-----				-----
				INTERSECTION ICU VALUE				0.742	INTERSECTION ICU VALUE			0.817
				AM INTERSECTION LOS				C	PM INTERSECTION LOS			D
				AM IMPACT				0.007	PM IMPACT			0.002

Capacity conservatively reduced to 1,200 vehicles per hour per lane due to historical high LOS



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 10: SHORELINEDR/ALAMITOS AV & E OCEAN BL
EXISTING + AMBIENT+ CUMULATIVE PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT RELATED			AM PEAK HOUR			PM PEAK HOUR			CRITICAL		
				GROWTH	PROJECT	TOTAL	V/C	PAIR	EXISTING	GROWTH	PROJECT	TOTAL	V/C	PAIR	
NB LEFT	1	1,200	33	2	1	36	0.030	*	71	4	3	78	0.065		
NB THRU	2	2,400	89	5	13	107	0.044		320	16	39	375	0.156		
NB RIGHT	1	1,600	109	6	8	123	0.077		264	13	29	306	0.192		
								0.232						0.291	
SB LEFT	1	1,200	59	3	22	84	0.070	*	93	5	21	119	0.099	*	
SB THRU	3	3600	290	15	22	327	0.202		118	6	36	160	0.109		
SB RIGHT	0	0	349	18	35	402	0.000		174	9	49	232	0.000		
EB LEFT	1	1,200	124	6	40	170	0.142	*	279	14	46	339	0.283		
EB THRU	3	3600	411	21	139	571	0.159		1474	75	152	1701	0.473		
EB RIGHT	1	1200	17	1	2	20	0.017		75	4	1	80	0.000		
								0.499						0.553	
WB LEFT	2	2,160	247	13	12	272	0.126	*	137	7	28	172	0.080	*	
WB THRU	3	3600	1120	57	43	1220	0.357		591	30	89	710	0.230		
WB RIGHT	0	0	55	3	9	67	0.000		92	5	21	118	0.000		
				NORTH/SOUTH CRITICAL SUM					0.232	NORTH/SOUTH CRITICAL SUM					0.291
				EAST/WEST CRITICAL SUM					0.499	EAST/WEST CRITICAL SUM					0.553
				CLEARANCE INTERVAL					0.100	CLEARANCE INTERVAL					0.100
				INTERSECTION ICU VALUE					0.831	INTERSECTION ICU VALUE					0.944
				AM INTERSECTION LOS					D	PM INTERSECTION LOS					E
				AM IMPACT					0.096	PM IMPACT					0.129

Capacity conservatively reduced to 1,200 vehicles per hour per lane due to historical high LOS



BREAKERS HOTEL - LONGBEACH
ICU CALCULATIONS

INTERSECTION 10: SHORELINEDR/ALAMITOS AV & E OCEAN BL
EXISTING + AMBIENT+ CUMULATIVE PROJECT + PROJECT

MOVEMENT	NO. OF LANES	CAPACITY	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT	TOTAL	AM PEAK HOUR			PM PEAK HOUR			TOTAL	V/C	CRITICAL PAIR		
								V/C	CRITICAL PAIR	EXISTING	AMBIENT GROWTH	RELATED PROJECT	PROJECT					
NB LEFT	1	1,200	33	2	1	2	38	0.031	*		71	4	3	4	82	0.068		
NB THRU	2	2,400	89	5	13	0	107	0.044			320	16	39	0	375	0.156		
NB RIGHT	1	1,600	109	6	8	0	123	0.077			264	13	29	0	306	0.192	*	
										0.235							0.291	
SB LEFT	1	1,200	59	3	22	0	84	0.070			93	5	21	0	119	0.099	*	
SB THRU	3	3600	290	15	22	0	327	0.204	*		118	6	36	0	160	0.111		
SB RIGHT	0	0	349	18	35	5	407	0.000			174	9	49	7	239	0.000		
EB LEFT	1	1,200	124	6	40	3	173	0.144	*		279	14	46	6	345	0.288		
EB THRU	3	3600	411	21	139	3	574	0.159			1474	75	152	6	1707	0.474	*	
EB RIGHT	1	1200	17	1	2	2	22	0.018			75	4	1	3	83	0.000		
										0.503							0.554	
WB LEFT	2	2,160	247	13	12	0	272	0.126			137	7	28	0	172	0.080	*	
WB THRU	3	3600	1120	57	43	5	1225	0.359	*		591	30	89	7	717	0.232		
WB RIGHT	0	0	55	3	9	0	67	0.000			92	5	21	0	118	0.000		
NORTH/SOUTH CRITICAL SUM											0.235	NORTH/SOUTH CRITICAL SUM						0.291
EAST/WEST CRITICAL SUM											0.503	EAST/WEST CRITICAL SUM						0.554
CLEARANCE INTERVAL											0.100	CLEARANCE INTERVAL						0.100
INTERSECTION ICU VALUE											0.838	INTERSECTION ICU VALUE						0.945
AM INTERSECTION LOS										D		PM INTERSECTION LOS					E	
AM IMPACT										0.007		PM IMPACT						0.001

Capacity conservatively reduced to 1,200 vehicles per hour per lane due to historical high LOS

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

Breakers Hotel (1806-19)
South Coast AQMD Air District, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Hotel	185.00	Room	0.49	186,032.00	0
City Park	0.61	Acre	0.61	26,571.60	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	31
Climate Zone	9			Operational Year	2021
Utility Company	Southern California Edison				
CO2 Intensity (lb/MW hr)	702.44	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	0.006

1.3 User Entered Comments & Non-Default Data

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

Project Characteristics - Construction timeline from Applicant (March 2019 - March 2021)

Land Use - Adaptive reuse of (E) Breakers Hotel Building (approx 172,000 sf) to a 185-room hotel (back to original building use). New building area added for stairwell and elevator. Total final gross floor area = 186,032 sf (on 0.49 ac lot). The (E) Victory Park is on a separate lot (0.61 ac). Modifications in Victory Park include new landscaping, a reconfigured driveway, and new passive park amenities.

Construction Phase - The project is an adaptive reuse and no building demolition required. Grading and site preparation limited to Victory Park. Victory Park grading and site preparation to start and stop over 20 days (Applicant). Building construction for stairwell addition to occur July 2019 to July 2020 (Applicant). Paving to occur over 75 days (start and stop) (Applicant). Painting and architectural coating to be done in stages during renovation/restoration beginning July 2019 to May 2020.

Off-road Equipment - No Building Demolition required for adaptive reuse.

Off-road Equipment -

Off-road Equipment - 2 excavators operating for 6 hours per day for 4 days (Applicant).

Off-road Equipment - Applicant: 5 lifts operating 8 hours per day for one week. 1 crane operating for 8 hours for 10 days.

Off-road Equipment - 1 pump per day operating for 4 hours per day for 10 days (applicant).

Off-road Equipment -

Grading - Victory Park - Site preparation and grading limited to Victory Park (0.61 ac). Soil export estimated at 500 cy (applicant).

Demolition - Approximately 1,000 tons of debris to be removed.

Vehicle Trips - Total trip generation for the hotel is 1,631 trips per day or 8.82 trips per room. Park trips are default trips.

Energy Use -

Mobile Land Use Mitigation -

Mobile Commute Mitigation - TDM Plan to be implemented for employees and hotel/venue patrons. No mitigation incorporated in analysis for conservative estimate.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10.00	220.00
tblConstructionPhase	NumDays	200.00	263.00
tblConstructionPhase	NumDays	20.00	0.00
tblConstructionPhase	NumDays	4.00	20.00
tblConstructionPhase	NumDays	10.00	75.00
tblConstructionPhase	NumDays	2.00	20.00
tblConstructionPhase	PhaseEndDate	2/7/2020	5/1/2020

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

tblConstructionPhase	PhaseEndDate	1/10/2020	7/1/2020
tblConstructionPhase	PhaseEndDate	3/28/2019	2/28/2019
tblConstructionPhase	PhaseEndDate	4/5/2019	5/28/2020
tblConstructionPhase	PhaseEndDate	1/24/2020	8/13/2020
tblConstructionPhase	PhaseEndDate	4/1/2019	5/28/2020
tblConstructionPhase	PhaseStartDate	1/25/2020	7/1/2019
tblConstructionPhase	PhaseStartDate	4/6/2019	7/1/2019
tblConstructionPhase	PhaseStartDate	4/2/2019	5/1/2020
tblConstructionPhase	PhaseStartDate	3/29/2019	5/1/2020
tblGrading	AcresOfGrading	7.50	0.61
tblGrading	AcresOfGrading	10.00	0.61
tblGrading	MaterialExported	0.00	500.00
tblLandUse	LandUseSquareFeet	268,620.00	186,032.00
tblLandUse	LotAcreage	6.17	0.49
tblOffRoadEquipment	LoadFactor	0.38	0.38
tblOffRoadEquipment	LoadFactor	0.31	0.31
tblOffRoadEquipment	LoadFactor	0.29	0.29
tblOffRoadEquipment	OffRoadEquipmentType		Excavators
tblOffRoadEquipment	OffRoadEquipmentType		Aerial Lifts
tblOffRoadEquipment	OffRoadEquipmentType		Cranes
tblOffRoadEquipment	OffRoadEquipmentType		Pumps
tblOffRoadEquipment	UsageHours	6.00	8.00
tblTripsAndVMT	HaulingTripNumber	63.00	62.00
tblVehicleTrips	ST_TR	8.19	8.82
tblVehicleTrips	SU_TR	5.95	8.82
tblVehicleTrips	WD_TR	8.17	8.82

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

2.0 Emissions Summary**2.1 Overall Construction (Maximum Daily Emission)****Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	11.7394	31.5371	28.8146	0.0609	1.4200	1.4165	2.8365	0.3817	1.3565	1.7381	0.0000	5,923.7078	5,923.7078	0.9562	0.0000	5,947.6126
2020	15.9448	77.2637	59.2959	0.1228	11.7300	3.4865	15.2165	5.8898	3.2630	9.1528	0.0000	11,898.6049	11,898.6049	2.6137	0.0000	11,963.9462
Maximum	15.9448	77.2637	59.2959	0.1228	11.7300	3.4865	15.2165	5.8898	3.2630	9.1528	0.0000	11,898.6049	11,898.6049	2.6137	0.0000	11,963.9462

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	11.7394	31.5371	28.8146	0.0609	1.4200	1.4165	2.8365	0.3817	1.3565	1.7381	0.0000	5,923.7078	5,923.7078	0.9562	0.0000	5,947.6126
2020	15.9448	77.2637	59.2959	0.1228	11.7300	3.4865	15.2165	5.8898	3.2630	9.1528	0.0000	11,898.6049	11,898.6049	2.6137	0.0000	11,963.9462
Maximum	15.9448	77.2637	59.2959	0.1228	11.7300	3.4865	15.2165	5.8898	3.2630	9.1528	0.0000	11,898.6049	11,898.6049	2.6137	0.0000	11,963.9462

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

[illegible]

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

2.2 Overall Operational**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	4.1591	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433
Energy	0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326
Mobile	2.6849	12.8645	30.7793	0.1074	8.3637	0.0845	8.4482	2.2379	0.0789	2.3167		10,924.4803	10,924.4803	0.5468		10,938.1491
Total	6.9757	14.0629	31.8048	0.1145	8.3637	0.1756	8.5393	2.2379	0.1700	2.4079		12,362.4089	12,362.4089	0.5744	0.0264	12,384.6250

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	4.1591	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433
Energy	0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326
Mobile	2.6849	12.8645	30.7793	0.1074	8.3637	0.0845	8.4482	2.2379	0.0789	2.3167		10,924.4803	10,924.4803	0.5468		10,938.1491
Total	6.9757	14.0629	31.8048	0.1145	8.3637	0.1756	8.5393	2.2379	0.1700	2.4079		12,362.4089	12,362.4089	0.5744	0.0264	12,384.6250

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	3/1/2019	2/28/2019	5	0	
2	Site Preparation	Site Preparation	5/1/2020	5/28/2020	5	20	Victory Park
3	Grading	Grading	5/1/2020	5/28/2020	5	20	Victory Park
4	Building Construction	Building Construction	7/1/2019	7/1/2020	5	263	Breakers Hotel Addition
5	Paving	Paving	1/11/2020	8/13/2020	5	75	Victory Park
6	Architectural Coating	Architectural Coating	7/1/2019	5/1/2020	5	220	Breakers Hotel

Acres of Grading (Site Preparation Phase): 0.61**Acres of Grading (Grading Phase): 0.61****Acres of Paving: 0****Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 279,048; Non-Residential Outdoor: 93,016; Striped Parking Area: 0 (Architectural Coating – sqft)****OffRoad Equipment**

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	1	6.00	9	0.56
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	1	6.00	89	0.20
Site Preparation	Graders	1	8.00	187	0.41
Paving	Pavers	1	6.00	130	0.42
Paving	Rollers	1	7.00	80	0.38
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Rubber Tired Dozers	1	6.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Grading	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Graders	1	6.00	187	0.41
Paving	Paving Equipment	1	8.00	132	0.36
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40
Building Construction	Welders	3	8.00	46	0.45
Grading	Excavators	2	6.00	158	0.38
Building Construction	Aerial Lifts	5	8.00	63	0.31
Building Construction	Cranes	1	8.00	231	0.29
Paving	Pumps	1	4.00	84	0.74

Trips and VMT

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	13.00	0.00	99.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	5	13.00	0.00	62.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	13	89.00	35.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2019

Unmitigated Construction On-Site

[illegible]

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.2 Demolition - 2019

Unmitigated Construction Off-Site

[illegible]

Mitigated Construction On-Site

[illegible]

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.2 Demolition - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

3.3 Site Preparation - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.3017	0.0000	5.3017	2.8999	0.0000	2.8999			0.0000			0.0000
Off-Road	1.6299	18.3464	7.7093	0.0172		0.8210	0.8210		0.7553	0.7553		1,667.4119	1,667.4119	0.5393		1,680.8937
Total	1.6299	18.3464	7.7093	0.0172	5.3017	0.8210	6.1226	2.8999	0.7553	3.6552		1,667.4119	1,667.4119	0.5393		1,680.8937

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.3 Site Preparation - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192
Total	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.3017	0.0000	5.3017	2.8999	0.0000	2.8999			0.0000			0.0000
Off-Road	1.6299	18.3464	7.7093	0.0172		0.8210	0.8210		0.7553	0.7553	0.0000	1,667.4119	1,667.4119	0.5393		1,680.8937
Total	1.6299	18.3464	7.7093	0.0172	5.3017	0.8210	6.1226	2.8999	0.7553	3.6552	0.0000	1,667.4119	1,667.4119	0.5393		1,680.8937

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.3 Site Preparation - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192
Total	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192

3.4 Grading - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.5517	0.0000	4.5517	2.4866	0.0000	2.4866			0.0000			0.0000
Off-Road	1.7191	18.7224	11.3805	0.0219		0.8606	0.8606		0.7917	0.7917		2,119.6469	2,119.6469	0.6855		2,136.7853
Total	1.7191	18.7224	11.3805	0.0219	4.5517	0.8606	5.4123	2.4866	0.7917	3.2783		2,119.6469	2,119.6469	0.6855		2,136.7853

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.4 Grading - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0236	0.8436	0.1679	2.4000e-003	0.0542	2.7200e-003	0.0569	0.0149	2.6000e-003	0.0175		259.8821	259.8821	0.0174		260.3180
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0588	0.0395	0.5315	1.4900e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		148.7743	148.7743	4.2800e-003		148.8812
Total	0.0824	0.8832	0.6993	3.8900e-003	0.1995	3.8200e-003	0.2033	0.0534	3.6200e-003	0.0570		408.6563	408.6563	0.0217		409.1992

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.5517	0.0000	4.5517	2.4866	0.0000	2.4866			0.0000			0.0000
Off-Road	1.7191	18.7224	11.3805	0.0219		0.8606	0.8606		0.7917	0.7917	0.0000	2,119.6469	2,119.6469	0.6855		2,136.7853
Total	1.7191	18.7224	11.3805	0.0219	4.5517	0.8606	5.4123	2.4866	0.7917	3.2783	0.0000	2,119.6469	2,119.6469	0.6855		2,136.7853

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.4 Grading - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0236	0.8436	0.1679	2.4000e-003	0.0542	2.7200e-003	0.0569	0.0149	2.6000e-003	0.0175		259.8821	259.8821	0.0174		260.3180
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0588	0.0395	0.5315	1.4900e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		148.7743	148.7743	4.2800e-003		148.8812
Total	0.0824	0.8832	0.6993	3.8900e-003	0.1995	3.8200e-003	0.2033	0.0534	3.6200e-003	0.0570		408.6563	408.6563	0.0217		409.1992

3.5 Building Construction - 2019**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.9753	25.3322	21.1973	0.0361		1.2519	1.2519		1.1937	1.1937		3,411.8325	3,411.8325	0.8289		3,432.5558
Total	2.9753	25.3322	21.1973	0.0361		1.2519	1.2519		1.1937	1.1937		3,411.8325	3,411.8325	0.8289		3,432.5558

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.5 Building Construction - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1349	4.0048	0.9681	9.0700e-003	0.2240	0.0265	0.2505	0.0645	0.0254	0.0899		966.7690	966.7690	0.0640		968.3682
Worker	0.4359	0.3033	3.9991	0.0106	0.9948	7.7400e-003	1.0026	0.2638	7.1300e-003	0.2710		1,051.0802	1,051.0802	0.0329		1,051.9021
Total	0.5708	4.3081	4.9672	0.0196	1.2188	0.0343	1.2531	0.3283	0.0325	0.3608		2,017.8492	2,017.8492	0.0968		2,020.2702

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.9753	25.3322	21.1973	0.0361		1.2519	1.2519		1.1937	1.1937	0.0000	3,411.8325	3,411.8325	0.8289		3,432.5558
Total	2.9753	25.3322	21.1973	0.0361		1.2519	1.2519		1.1937	1.1937	0.0000	3,411.8325	3,411.8325	0.8289		3,432.5558

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.5 Building Construction - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1349	4.0048	0.9681	9.0700e-003	0.2240	0.0265	0.2505	0.0645	0.0254	0.0899		966.7690	966.7690	0.0640		968.3682
Worker	0.4359	0.3033	3.9991	0.0106	0.9948	7.7400e-003	1.0026	0.2638	7.1300e-003	0.2710		1,051.0802	1,051.0802	0.0329		1,051.9021
Total	0.5708	4.3081	4.9672	0.0196	1.2188	0.0343	1.2531	0.3283	0.0325	0.3608		2,017.8492	2,017.8492	0.0968		2,020.2702

3.5 Building Construction - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.6777	23.3439	20.7291	0.0361		1.0880	1.0880		1.0375	1.0375		3,364.6661	3,364.6661	0.8125		3,384.9780
Total	2.6777	23.3439	20.7291	0.0361		1.0880	1.0880		1.0375	1.0375		3,364.6661	3,364.6661	0.8125		3,384.9780

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.5 Building Construction - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1149	3.6727	0.8746	9.0100e-003	0.2240	0.0182	0.2422	0.0645	0.0174	0.0819		960.5696	960.5696	0.0603		962.0773
Worker	0.4027	0.2707	3.6385	0.0102	0.9948	7.5500e-003	1.0024	0.2638	6.9500e-003	0.2708		1,018.5315	1,018.5315	0.0293		1,019.2636
Total	0.5176	3.9434	4.5130	0.0192	1.2188	0.0258	1.2446	0.3283	0.0244	0.3527		1,979.1011	1,979.1011	0.0896		1,981.3409

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.6777	23.3439	20.7291	0.0361		1.0880	1.0880		1.0375	1.0375	0.0000	3,364.6661	3,364.6661	0.8125		3,384.9780
Total	2.6777	23.3439	20.7291	0.0361		1.0880	1.0880		1.0375	1.0375	0.0000	3,364.6661	3,364.6661	0.8125		3,384.9780

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.5 Building Construction - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1149	3.6727	0.8746	9.0100e-003	0.2240	0.0182	0.2422	0.0645	0.0174	0.0819		960.5696	960.5696	0.0603		962.0773
Worker	0.4027	0.2707	3.6385	0.0102	0.9948	7.5500e-003	1.0024	0.2638	6.9500e-003	0.2708		1,018.5315	1,018.5315	0.0293		1,019.2636
Total	0.5176	3.9434	4.5130	0.0192	1.2188	0.0258	1.2446	0.3283	0.0244	0.3527		1,979.1011	1,979.1011	0.0896		1,981.3409

3.6 Paving - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0518	10.2159	10.7571	0.0168		0.5731	0.5731		0.5364	0.5364		1,608.4634	1,608.4634	0.4298		1,619.2078
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	1.0518	10.2159	10.7571	0.0168		0.5731	0.5731		0.5364	0.5364		1,608.4634	1,608.4634	0.4298		1,619.2078

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.6 Paving - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0679	0.0456	0.6132	1.7200e-003	0.1677	1.2700e-003	0.1689	0.0445	1.1700e-003	0.0456		171.6626	171.6626	4.9400e-003		171.7860
Total	0.0679	0.0456	0.6132	1.7200e-003	0.1677	1.2700e-003	0.1689	0.0445	1.1700e-003	0.0456		171.6626	171.6626	4.9400e-003		171.7860

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0518	10.2159	10.7571	0.0168		0.5731	0.5731		0.5364	0.5364	0.0000	1,608.4634	1,608.4634	0.4298		1,619.2078
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	1.0518	10.2159	10.7571	0.0168		0.5731	0.5731		0.5364	0.5364	0.0000	1,608.4634	1,608.4634	0.4298		1,619.2078

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.6 Paving - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0679	0.0456	0.6132	1.7200e-003	0.1677	1.2700e-003	0.1689	0.0445	1.1700e-003	0.0456		171.6626	171.6626	4.9400e-003		171.7860
Total	0.0679	0.0456	0.6132	1.7200e-003	0.1677	1.2700e-003	0.1689	0.0445	1.1700e-003	0.0456		171.6626	171.6626	4.9400e-003		171.7860

3.7 Architectural Coating - 2019**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.8387					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2664	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288		281.4481	281.4481	0.0238		282.0423
Total	8.1052	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288		281.4481	281.4481	0.0238		282.0423

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.7 Architectural Coating - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0882	0.0613	0.8088	2.1400e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4400e-003	0.0548		212.5780	212.5780	6.6500e-003		212.7442
Total	0.0882	0.0613	0.8088	2.1400e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4400e-003	0.0548		212.5780	212.5780	6.6500e-003		212.7442

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.8387					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2664	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288	0.0000	281.4481	281.4481	0.0238		282.0423
Total	8.1052	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288	0.0000	281.4481	281.4481	0.0238		282.0423

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.7 Architectural Coating - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0882	0.0613	0.8088	2.1400e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4400e-003	0.0548		212.5780	212.5780	6.6500e-003		212.7442
Total	0.0882	0.0613	0.8088	2.1400e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4400e-003	0.0548		212.5780	212.5780	6.6500e-003		212.7442

3.7 Architectural Coating - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.8387					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109		281.4481	281.4481	0.0218		281.9928
Total	8.0809	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109		281.4481	281.4481	0.0218		281.9928

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.7 Architectural Coating - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0814	0.0547	0.7359	2.0700e-003	0.2012	1.5300e-003	0.2027	0.0534	1.4100e-003	0.0548		205.9951	205.9951	5.9200e-003		206.1432
Total	0.0814	0.0547	0.7359	2.0700e-003	0.2012	1.5300e-003	0.2027	0.0534	1.4100e-003	0.0548		205.9951	205.9951	5.9200e-003		206.1432

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.8387					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109	0.0000	281.4481	281.4481	0.0218		281.9928
Total	8.0809	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109	0.0000	281.4481	281.4481	0.0218		281.9928

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.7 Architectural Coating - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0814	0.0547	0.7359	2.0700e-003	0.2012	1.5300e-003	0.2027	0.0534	1.4100e-003	0.0548		205.9951	205.9951	5.9200e-003		206.1432
Total	0.0814	0.0547	0.7359	2.0700e-003	0.2012	1.5300e-003	0.2027	0.0534	1.4100e-003	0.0548		205.9951	205.9951	5.9200e-003		206.1432

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	2.6849	12.8645	30.7793	0.1074	8.3637	0.0845	8.4482	2.2379	0.0789	2.3167		10,924.4803	10,924.4803	0.5468		10,938.1491
Unmitigated	2.6849	12.8645	30.7793	0.1074	8.3637	0.0845	8.4482	2.2379	0.0789	2.3167		10,924.4803	10,924.4803	0.5468		10,938.1491

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
City Park	1.15	13.88	10.21	12,272	12,272
Hotel	1,631.70	1,631.70	1,631.70	3,893,515	3,893,515
Total	1,632.85	1,645.58	1,641.91	3,905,787	3,905,787

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
City Park	16.60	8.40	6.90	33.00	48.00	19.00	66	28	6
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
City Park	0.548858	0.043235	0.200706	0.120309	0.016131	0.005851	0.021034	0.033479	0.002070	0.001877	0.004817	0.000707	0.000925
Hotel	0.548858	0.043235	0.200706	0.120309	0.016131	0.005851	0.021034	0.033479	0.002070	0.001877	0.004817	0.000707	0.000925

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326
NaturalGas Unmitigated	0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

5.2 Energy by Land Use - NaturalGas**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Hotel	12222	0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326
Total		0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Hotel	12.222	0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326
Total		0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326

6.0 Area Detail**6.1 Mitigation Measures Area**

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	4.1591	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433
Unmitigated	4.1591	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.4725					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	3.6848					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.7800e-003	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433
Total	4.1591	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

6.2 Area by SubCategory**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.4725					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	3.6848					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.7800e-003	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433
Total	4.1591	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433

7.0 Water Detail**7.1 Mitigation Measures Water****8.0 Waste Detail****8.1 Mitigation Measures Waste****9.0 Operational Offroad**

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment**Fire Pumps and Emergency Generators**

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

Breakers Hotel (1806-19)
South Coast AQMD Air District, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Hotel	185.00	Room	0.49	186,032.00	0
City Park	0.61	Acre	0.61	26,571.60	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	31
Climate Zone	9			Operational Year	2021
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	CH4 Intensity (lb/MWhr)	0.029	N2O Intensity (lb/MWhr)	0.006

1.3 User Entered Comments & Non-Default Data

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

Project Characteristics - Construction timeline from Applicant (March 2019 - March 2021)

Land Use - Adaptive reuse of (E) Breakers Hotel Building (approx 172,000 sf) to a 185-room hotel (back to original building use). New building area added for stairwell and elevator. Total final gross floor area = 186,032 sf (on 0.49 ac lot). The (E) Victory Park is on a separate lot (0.61 ac). Modifications in Victory Park include new landscaping, a reconfigured driveway, and new passive park amenities.

Construction Phase - The project is an adaptive reuse and no building demolition required. Grading and site preparation limited to Victory Park. Victory Park grading and site preparation to start and stop over 20 days (Applicant). Building construction for stairwell addition to occur July 2019 to July 2020 (Applicant). Paving to occur over 75 days (start and stop) (Applicant). Painting and architectural coating to be done in stages during renovation/restoration beginning July 2019 to May 2020.

Off-road Equipment - No Building Demolition required for adaptive reuse.

Off-road Equipment -

Off-road Equipment - 2 excavators operating for 6 hours per day for 4 days (Applicant).

Off-road Equipment - Applicant: 5 lifts operating 8 hours per day for one week. 1 crane operating for 8 hours for 10 days.

Off-road Equipment - 1 pump per day operating for 4 hours per day for 10 days (applicant).

Off-road Equipment -

Grading - Victory Park - Site preparation and grading limited to Victory Park (0.61 ac). Soil export estimated at 500 cy (applicant).

Demolition - Approximately 1,000 tons of debris to be removed.

Vehicle Trips - Total trip generation for the hotel is 1,631 trips per day or 8.82 trips per room. Park trips are default trips.

Energy Use -

Mobile Land Use Mitigation -

Mobile Commute Mitigation - TDM Plan to be implemented for employees and hotel/venue patrons. No mitigation incorporated in analysis for conservative estimate.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10.00	220.00
tblConstructionPhase	NumDays	200.00	263.00
tblConstructionPhase	NumDays	20.00	0.00
tblConstructionPhase	NumDays	4.00	20.00
tblConstructionPhase	NumDays	10.00	75.00
tblConstructionPhase	NumDays	2.00	20.00
tblConstructionPhase	PhaseEndDate	2/7/2020	5/1/2020

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

tblConstructionPhase	PhaseEndDate	1/10/2020	7/1/2020
tblConstructionPhase	PhaseEndDate	3/28/2019	2/28/2019
tblConstructionPhase	PhaseEndDate	4/5/2019	5/28/2020
tblConstructionPhase	PhaseEndDate	1/24/2020	8/13/2020
tblConstructionPhase	PhaseEndDate	4/1/2019	5/28/2020
tblConstructionPhase	PhaseStartDate	1/25/2020	7/1/2019
tblConstructionPhase	PhaseStartDate	4/6/2019	7/1/2019
tblConstructionPhase	PhaseStartDate	4/2/2019	5/1/2020
tblConstructionPhase	PhaseStartDate	3/29/2019	5/1/2020
tblGrading	AcresOfGrading	7.50	0.61
tblGrading	AcresOfGrading	10.00	0.61
tblGrading	MaterialExported	0.00	500.00
tblLandUse	LandUseSquareFeet	268,620.00	186,032.00
tblLandUse	LotAcreage	6.17	0.49
tblOffRoadEquipment	LoadFactor	0.38	0.38
tblOffRoadEquipment	LoadFactor	0.31	0.31
tblOffRoadEquipment	LoadFactor	0.29	0.29
tblOffRoadEquipment	OffRoadEquipmentType		Excavators
tblOffRoadEquipment	OffRoadEquipmentType		Aerial Lifts
tblOffRoadEquipment	OffRoadEquipmentType		Cranes
tblOffRoadEquipment	OffRoadEquipmentType		Pumps
tblOffRoadEquipment	UsageHours	6.00	8.00
tblTripsAndVMT	HaulingTripNumber	63.00	62.00
tblVehicleTrips	ST_TR	8.19	8.82
tblVehicleTrips	SU_TR	5.95	8.82
tblVehicleTrips	WD_TR	8.17	8.82

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

2.0 Emissions Summary**2.1 Overall Construction (Maximum Daily Emission)****Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	11.7919	31.5747	28.4544	0.0598	1.4200	1.4169	2.8369	0.3817	1.3569	1.7385	0.0000	5,814.369 2	5,814.369 2	0.9584	0.0000	5,838.328 4
2020	16.0096	77.3120	58.8268	0.1215	11.7300	3.4869	15.2168	5.8898	3.2633	9.1531	0.0000	11,760.15 14	11,760.15 14	2.6157	0.0000	11,825.54 43
Maximum	16.0096	77.3120	58.8268	0.1215	11.7300	3.4869	15.2168	5.8898	3.2633	9.1531	0.0000	11,760.15 14	11,760.15 14	2.6157	0.0000	11,825.54 43

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	11.7919	31.5747	28.4544	0.0598	1.4200	1.4169	2.8369	0.3817	1.3569	1.7385	0.0000	5,814.369 2	5,814.369 2	0.9584	0.0000	5,838.328 4
2020	16.0096	77.3120	58.8268	0.1215	11.7300	3.4869	15.2168	5.8898	3.2633	9.1531	0.0000	11,760.15 14	11,760.15 14	2.6157	0.0000	11,825.54 43
Maximum	16.0096	77.3120	58.8268	0.1215	11.7300	3.4869	15.2168	5.8898	3.2633	9.1531	0.0000	11,760.15 14	11,760.15 14	2.6157	0.0000	11,825.54 43

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

[illegible]

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

2.2 Overall Operational**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	4.1591	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433
Energy	0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326
Mobile	2.5472	13.0462	29.2594	0.1015	8.3637	0.0852	8.4489	2.2379	0.0795	2.3174		10,333.2165	10,333.2165	0.5509		10,346.9901
Total	6.8380	14.2446	30.2849	0.1087	8.3637	0.1763	8.5400	2.2379	0.1707	2.4085		11,771.1451	11,771.1451	0.5786	0.0264	11,793.4660

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	4.1591	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433
Energy	0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326
Mobile	2.5472	13.0462	29.2594	0.1015	8.3637	0.0852	8.4489	2.2379	0.0795	2.3174		10,333.2165	10,333.2165	0.5509		10,346.9901
Total	6.8380	14.2446	30.2849	0.1087	8.3637	0.1763	8.5400	2.2379	0.1707	2.4085		11,771.1451	11,771.1451	0.5786	0.0264	11,793.4660

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	3/1/2019	2/28/2019	5	0	
2	Site Preparation	Site Preparation	5/1/2020	5/28/2020	5	20	Victory Park
3	Grading	Grading	5/1/2020	5/28/2020	5	20	Victory Park
4	Building Construction	Building Construction	7/1/2019	7/1/2020	5	263	Breakers Hotel Addition
5	Paving	Paving	1/11/2020	8/13/2020	5	75	Victory Park
6	Architectural Coating	Architectural Coating	7/1/2019	5/1/2020	5	220	Breakers Hotel

Acres of Grading (Site Preparation Phase): 0.61**Acres of Grading (Grading Phase): 0.61****Acres of Paving: 0****Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 279,048; Non-Residential Outdoor: 93,016; Striped Parking Area: 0 (Architectural Coating – sqft)****OffRoad Equipment**

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	1	6.00	9	0.56
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	1	6.00	89	0.20
Site Preparation	Graders	1	8.00	187	0.41
Paving	Pavers	1	6.00	130	0.42
Paving	Rollers	1	7.00	80	0.38
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Rubber Tired Dozers	1	6.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Grading	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Graders	1	6.00	187	0.41
Paving	Paving Equipment	1	8.00	132	0.36
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40
Building Construction	Welders	3	8.00	46	0.45
Grading	Excavators	2	6.00	158	0.38
Building Construction	Aerial Lifts	5	8.00	63	0.31
Building Construction	Cranes	1	8.00	231	0.29
Paving	Pumps	1	4.00	84	0.74

Trips and VMT

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	13.00	0.00	99.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	5	13.00	0.00	62.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	13	89.00	35.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2019

Unmitigated Construction On-Site

[illegible]

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.2 Demolition - 2019

Unmitigated Construction Off-Site

[illegible]

Mitigated Construction On-Site

[illegible]

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.2 Demolition - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

3.3 Site Preparation - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.3017	0.0000	5.3017	2.8999	0.0000	2.8999			0.0000			0.0000
Off-Road	1.6299	18.3464	7.7093	0.0172		0.8210	0.8210		0.7553	0.7553		1,667.4119	1,667.4119	0.5393		1,680.8937
Total	1.6299	18.3464	7.7093	0.0172	5.3017	0.8210	6.1226	2.8999	0.7553	3.6552		1,667.4119	1,667.4119	0.5393		1,680.8937

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.3 Site Preparation - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906
Total	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.3017	0.0000	5.3017	2.8999	0.0000	2.8999			0.0000			0.0000
Off-Road	1.6299	18.3464	7.7093	0.0172		0.8210	0.8210		0.7553	0.7553	0.0000	1,667.4119	1,667.4119	0.5393		1,680.8937
Total	1.6299	18.3464	7.7093	0.0172	5.3017	0.8210	6.1226	2.8999	0.7553	3.6552	0.0000	1,667.4119	1,667.4119	0.5393		1,680.8937

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.3 Site Preparation - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906
Total	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906

3.4 Grading - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.5517	0.0000	4.5517	2.4866	0.0000	2.4866			0.0000			0.0000
Off-Road	1.7191	18.7224	11.3805	0.0219		0.8606	0.8606		0.7917	0.7917		2,119.6469	2,119.6469	0.6855		2,136.7853
Total	1.7191	18.7224	11.3805	0.0219	4.5517	0.8606	5.4123	2.4866	0.7917	3.2783		2,119.6469	2,119.6469	0.6855		2,136.7853

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.4 Grading - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0242	0.8545	0.1807	2.3600e-003	0.0542	2.7600e-003	0.0569	0.0149	2.6400e-003	0.0175		255.0984	255.0984	0.0182		255.5533
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0642	0.0433	0.4785	1.4000e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		139.1474	139.1474	3.9900e-003		139.2472
Total	0.0884	0.8978	0.6592	3.7600e-003	0.1995	3.8600e-003	0.2033	0.0534	3.6600e-003	0.0570		394.2458	394.2458	0.0222		394.8005

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.5517	0.0000	4.5517	2.4866	0.0000	2.4866			0.0000			0.0000
Off-Road	1.7191	18.7224	11.3805	0.0219		0.8606	0.8606		0.7917	0.7917	0.0000	2,119.6469	2,119.6469	0.6855		2,136.7853
Total	1.7191	18.7224	11.3805	0.0219	4.5517	0.8606	5.4123	2.4866	0.7917	3.2783	0.0000	2,119.6469	2,119.6469	0.6855		2,136.7853

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.4 Grading - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0242	0.8545	0.1807	2.3600e-003	0.0542	2.7600e-003	0.0569	0.0149	2.6400e-003	0.0175		255.0984	255.0984	0.0182		255.5533
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0642	0.0433	0.4785	1.4000e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		139.1474	139.1474	3.9900e-003		139.2472
Total	0.0884	0.8978	0.6592	3.7600e-003	0.1995	3.8600e-003	0.2033	0.0534	3.6600e-003	0.0570		394.2458	394.2458	0.0222		394.8005

3.5 Building Construction - 2019**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.9753	25.3322	21.1973	0.0361		1.2519	1.2519		1.1937	1.1937		3,411.8325	3,411.8325	0.8289		3,432.5558
Total	2.9753	25.3322	21.1973	0.0361		1.2519	1.2519		1.1937	1.1937		3,411.8325	3,411.8325	0.8289		3,432.5558

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.5 Building Construction - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1410	4.0077	1.0782	8.8200e-003	0.2240	0.0269	0.2510	0.0645	0.0258	0.0903		939.1069	939.1069	0.0687		940.8254
Worker	0.4746	0.3322	3.6079	9.8700e-003	0.9948	7.7400e-003	1.0026	0.2638	7.1300e-003	0.2710		983.1436	983.1436	0.0307		983.9115
Total	0.6155	4.3399	4.6861	0.0187	1.2188	0.0347	1.2535	0.3283	0.0329	0.3612		1,922.2506	1,922.2506	0.0995		1,924.7369

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.9753	25.3322	21.1973	0.0361		1.2519	1.2519		1.1937	1.1937	0.0000	3,411.8325	3,411.8325	0.8289		3,432.5558
Total	2.9753	25.3322	21.1973	0.0361		1.2519	1.2519		1.1937	1.1937	0.0000	3,411.8325	3,411.8325	0.8289		3,432.5558

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.5 Building Construction - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1410	4.0077	1.0782	8.8200e-003	0.2240	0.0269	0.2510	0.0645	0.0258	0.0903		939.1069	939.1069	0.0687		940.8254
Worker	0.4746	0.3322	3.6079	9.8700e-003	0.9948	7.7400e-003	1.0026	0.2638	7.1300e-003	0.2710		983.1436	983.1436	0.0307		983.9115
Total	0.6155	4.3399	4.6861	0.0187	1.2188	0.0347	1.2535	0.3283	0.0329	0.3612		1,922.2506	1,922.2506	0.0995		1,924.7369

3.5 Building Construction - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.6777	23.3439	20.7291	0.0361		1.0880	1.0880		1.0375	1.0375		3,364.6661	3,364.6661	0.8125		3,384.9780
Total	2.6777	23.3439	20.7291	0.0361		1.0880	1.0880		1.0375	1.0375		3,364.6661	3,364.6661	0.8125		3,384.9780

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.5 Building Construction - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1204	3.6689	0.9751	8.7500e-003	0.2240	0.0185	0.2425	0.0645	0.0177	0.0822		932.7948	932.7948	0.0648		934.4141
Worker	0.4392	0.2964	3.2760	9.5600e-003	0.9948	7.5500e-003	1.0024	0.2638	6.9500e-003	0.2708		952.6248	952.6248	0.0273		953.3078
Total	0.5596	3.9653	4.2510	0.0183	1.2188	0.0260	1.2448	0.3283	0.0246	0.3529		1,885.4196	1,885.4196	0.0921		1,887.7219

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.6777	23.3439	20.7291	0.0361		1.0880	1.0880		1.0375	1.0375	0.0000	3,364.6661	3,364.6661	0.8125		3,384.9780
Total	2.6777	23.3439	20.7291	0.0361		1.0880	1.0880		1.0375	1.0375	0.0000	3,364.6661	3,364.6661	0.8125		3,384.9780

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.5 Building Construction - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1204	3.6689	0.9751	8.7500e-003	0.2240	0.0185	0.2425	0.0645	0.0177	0.0822		932.7948	932.7948	0.0648		934.4141
Worker	0.4392	0.2964	3.2760	9.5600e-003	0.9948	7.5500e-003	1.0024	0.2638	6.9500e-003	0.2708		952.6248	952.6248	0.0273		953.3078
Total	0.5596	3.9653	4.2510	0.0183	1.2188	0.0260	1.2448	0.3283	0.0246	0.3529		1,885.4196	1,885.4196	0.0921		1,887.7219

3.6 Paving - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0518	10.2159	10.7571	0.0168		0.5731	0.5731		0.5364	0.5364		1,608.4634	1,608.4634	0.4298		1,619.2078
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	1.0518	10.2159	10.7571	0.0168		0.5731	0.5731		0.5364	0.5364		1,608.4634	1,608.4634	0.4298		1,619.2078

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.6 Paving - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0740	0.0500	0.5521	1.6100e-003	0.1677	1.2700e-003	0.1689	0.0445	1.1700e-003	0.0456		160.5547	160.5547	4.6000e-003		160.6699
Total	0.0740	0.0500	0.5521	1.6100e-003	0.1677	1.2700e-003	0.1689	0.0445	1.1700e-003	0.0456		160.5547	160.5547	4.6000e-003		160.6699

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0518	10.2159	10.7571	0.0168		0.5731	0.5731		0.5364	0.5364	0.0000	1,608.4634	1,608.4634	0.4298		1,619.2078
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	1.0518	10.2159	10.7571	0.0168		0.5731	0.5731		0.5364	0.5364	0.0000	1,608.4634	1,608.4634	0.4298		1,619.2078

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.6 Paving - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0740	0.0500	0.5521	1.6100e-003	0.1677	1.2700e-003	0.1689	0.0445	1.1700e-003	0.0456		160.5547	160.5547	4.6000e-003		160.6699
Total	0.0740	0.0500	0.5521	1.6100e-003	0.1677	1.2700e-003	0.1689	0.0445	1.1700e-003	0.0456		160.5547	160.5547	4.6000e-003		160.6699

3.7 Architectural Coating - 2019**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.8387					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2664	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288		281.4481	281.4481	0.0238		282.0423
Total	8.1052	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288		281.4481	281.4481	0.0238		282.0423

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.7 Architectural Coating - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0960	0.0672	0.7297	2.0000e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4400e-003	0.0548		198.8380	198.8380	6.2100e-003		198.9933
Total	0.0960	0.0672	0.7297	2.0000e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4400e-003	0.0548		198.8380	198.8380	6.2100e-003		198.9933

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.8387					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2664	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288	0.0000	281.4481	281.4481	0.0238		282.0423
Total	8.1052	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288	0.0000	281.4481	281.4481	0.0238		282.0423

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.7 Architectural Coating - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0960	0.0672	0.7297	2.0000e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4400e-003	0.0548		198.8380	198.8380	6.2100e-003		198.9933
Total	0.0960	0.0672	0.7297	2.0000e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4400e-003	0.0548		198.8380	198.8380	6.2100e-003		198.9933

3.7 Architectural Coating - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.8387					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109		281.4481	281.4481	0.0218		281.9928
Total	8.0809	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109		281.4481	281.4481	0.0218		281.9928

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.7 Architectural Coating - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0888	0.0599	0.6626	1.9300e-003	0.2012	1.5300e-003	0.2027	0.0534	1.4100e-003	0.0548		192.6657	192.6657	5.5300e-003		192.8038
Total	0.0888	0.0599	0.6626	1.9300e-003	0.2012	1.5300e-003	0.2027	0.0534	1.4100e-003	0.0548		192.6657	192.6657	5.5300e-003		192.8038

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.8387					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109	0.0000	281.4481	281.4481	0.0218		281.9928
Total	8.0809	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109	0.0000	281.4481	281.4481	0.0218		281.9928

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.7 Architectural Coating - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0888	0.0599	0.6626	1.9300e-003	0.2012	1.5300e-003	0.2027	0.0534	1.4100e-003	0.0548		192.6657	192.6657	5.5300e-003		192.8038
Total	0.0888	0.0599	0.6626	1.9300e-003	0.2012	1.5300e-003	0.2027	0.0534	1.4100e-003	0.0548		192.6657	192.6657	5.5300e-003		192.8038

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	2.5472	13.0462	29.2594	0.1015	8.3637	0.0852	8.4489	2.2379	0.0795	2.3174		10,333.2165	10,333.2165	0.5509		10,346.9901
Unmitigated	2.5472	13.0462	29.2594	0.1015	8.3637	0.0852	8.4489	2.2379	0.0795	2.3174		10,333.2165	10,333.2165	0.5509		10,346.9901

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
City Park	1.15	13.88	10.21	12,272	12,272
Hotel	1,631.70	1,631.70	1,631.70	3,893,515	3,893,515
Total	1,632.85	1,645.58	1,641.91	3,905,787	3,905,787

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
City Park	16.60	8.40	6.90	33.00	48.00	19.00	66	28	6
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
City Park	0.548858	0.043235	0.200706	0.120309	0.016131	0.005851	0.021034	0.033479	0.002070	0.001877	0.004817	0.000707	0.000925
Hotel	0.548858	0.043235	0.200706	0.120309	0.016131	0.005851	0.021034	0.033479	0.002070	0.001877	0.004817	0.000707	0.000925

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326
NaturalGas Unmitigated	0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

5.2 Energy by Land Use - NaturalGas**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Hotel	12222	0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326
Total		0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Hotel	12.222	0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326
Total		0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326

6.0 Area Detail**6.1 Mitigation Measures Area**

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	4.1591	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433
Unmitigated	4.1591	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.4725					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	3.6848					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.7800e-003	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433
Total	4.1591	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

6.2 Area by SubCategory**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.4725					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	3.6848					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.7800e-003	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433
Total	4.1591	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433

7.0 Water Detail**7.1 Mitigation Measures Water****8.0 Waste Detail****8.1 Mitigation Measures Waste****9.0 Operational Offroad**

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment**Fire Pumps and Emergency Generators**

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

Breakers Hotel (1806-19) - South Coast AQMD Air District, Annual

Breakers Hotel (1806-19)
South Coast AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Hotel	185.00	Room	0.49	186,032.00	0
City Park	0.61	Acre	0.61	26,571.60	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	31
Climate Zone	9			Operational Year	2021
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	CH4 Intensity (lb/MWhr)	0.029	N2O Intensity (lb/MWhr)	0.006

1.3 User Entered Comments & Non-Default Data

Breakers Hotel (1806-19) - South Coast AQMD Air District, Annual

Project Characteristics - Construction timeline from Applicant (March 2019 - March 2021)

Land Use - Adaptive reuse of (E) Breakers Hotel Building (approx 172,000 sf) to a 185-room hotel (back to original building use). New building area added for stairwell and elevator. Total final gross floor area = 186,032 sf (on 0.49 ac lot). The (E) Victory Park is on a separate lot (0.61 ac). Modifications in Victory Park include new landscaping, a reconfigured driveway, and new passive park amenities.

Construction Phase - The project is an adaptive reuse and no building demolition required. Grading and site preparation limited to Victory Park. Victory Park grading and site preparation to start and stop over 20 days (Applicant). Building construction for stairwell addition to occur July 2019 to July 2020 (Applicant). Paving to occur over 75 days (start and stop) (Applicant). Painting and architectural coating to be done in stages during renovation/restoration beginning July 2019 to May 2020.

Off-road Equipment - No Building Demolition required for adaptive reuse.

Off-road Equipment -

Off-road Equipment - 2 excavators operating for 6 hours per day for 4 days (Applicant).

Off-road Equipment - Applicant: 5 lifts operating 8 hours per day for one week. 1 crane operating for 8 hours for 10 days.

Off-road Equipment - 1 pump per day operating for 4 hours per day for 10 days (applicant).

Off-road Equipment -

Grading - Victory Park - Site preparation and grading limited to Victory Park (0.61 ac). Soil export estimated at 500 cy (applicant).

Demolition - Approximately 1,000 tons of debris to be removed.

Vehicle Trips - Total trip generation for the hotel is 1,631 trips per day or 8.82 trips per room. Park trips are default trips.

Energy Use -

Mobile Land Use Mitigation -

Mobile Commute Mitigation - TDM Plan to be implemented for employees and hotel/venue patrons. No mitigation incorporated in analysis for conservative estimate.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10.00	220.00
tblConstructionPhase	NumDays	200.00	263.00
tblConstructionPhase	NumDays	20.00	0.00
tblConstructionPhase	NumDays	4.00	20.00
tblConstructionPhase	NumDays	10.00	75.00
tblConstructionPhase	NumDays	2.00	20.00
tblConstructionPhase	PhaseEndDate	2/7/2020	5/1/2020

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tblConstructionPhase	PhaseEndDate	1/10/2020	7/1/2020
tblConstructionPhase	PhaseEndDate	3/28/2019	2/28/2019
tblConstructionPhase	PhaseEndDate	4/5/2019	5/28/2020
tblConstructionPhase	PhaseEndDate	1/24/2020	8/13/2020
tblConstructionPhase	PhaseEndDate	4/1/2019	5/28/2020
tblConstructionPhase	PhaseStartDate	1/25/2020	7/1/2019
tblConstructionPhase	PhaseStartDate	4/6/2019	7/1/2019
tblConstructionPhase	PhaseStartDate	4/2/2019	5/1/2020
tblConstructionPhase	PhaseStartDate	3/29/2019	5/1/2020
tblGrading	AcresOfGrading	7.50	0.61
tblGrading	AcresOfGrading	10.00	0.61
tblGrading	MaterialExported	0.00	500.00
tblLandUse	LandUseSquareFeet	268,620.00	186,032.00
tblLandUse	LotAcreage	6.17	0.49
tblOffRoadEquipment	LoadFactor	0.38	0.38
tblOffRoadEquipment	LoadFactor	0.31	0.31
tblOffRoadEquipment	LoadFactor	0.29	0.29
tblOffRoadEquipment	OffRoadEquipmentType		Excavators
tblOffRoadEquipment	OffRoadEquipmentType		Aerial Lifts
tblOffRoadEquipment	OffRoadEquipmentType		Cranes
tblOffRoadEquipment	OffRoadEquipmentType		Pumps
tblOffRoadEquipment	UsageHours	6.00	8.00
tblTripsAndVMT	HaulingTripNumber	63.00	62.00
tblVehicleTrips	ST_TR	8.19	8.82
tblVehicleTrips	SU_TR	5.95	8.82
tblVehicleTrips	WD_TR	8.17	8.82

Breakers Hotel (1806-19) - South Coast AQMD Air District, Annual

2.0 Emissions Summary**2.1 Overall Construction****Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2019	0.7745	2.0895	1.8825	3.9700e-003	0.0927	0.0935	0.1862	0.0249	0.0895	0.1145	0.0000	350.3035	350.3035	0.0573	0.0000	351.7351
2020	0.6890	3.0411	2.8223	5.6600e-003	0.2011	0.1390	0.3401	0.0815	0.1314	0.2129	0.0000	495.4806	495.4806	0.0964	0.0000	497.8907
Maximum	0.7745	3.0411	2.8223	5.6600e-003	0.2011	0.1390	0.3401	0.0815	0.1314	0.2129	0.0000	495.4806	495.4806	0.0964	0.0000	497.8907

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2019	0.7745	2.0895	1.8825	3.9700e-003	0.0927	0.0935	0.1862	0.0249	0.0895	0.1145	0.0000	350.3032	350.3032	0.0573	0.0000	351.7348
2020	0.6890	3.0411	2.8223	5.6600e-003	0.2011	0.1390	0.3401	0.0815	0.1314	0.2129	0.0000	495.4802	495.4802	0.0964	0.0000	497.8903
Maximum	0.7745	3.0411	2.8223	5.6600e-003	0.2011	0.1390	0.3401	0.0815	0.1314	0.2129	0.0000	495.4802	495.4802	0.0964	0.0000	497.8903

Breakers Hotel (1806-19) - South Coast AQMD Air District, Annual

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
2	6-1-2019	8-31-2019	0.9583	0.9583
3	9-1-2019	11-30-2019	1.4084	1.4084
4	12-1-2019	2-29-2020	1.5506	1.5506
5	3-1-2020	5-31-2020	2.0102	2.0102
6	6-1-2020	8-31-2020	0.6383	0.6383
		Highest	2.0102	2.0102

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.7589	2.0000e-005	2.3800e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	4.6100e-003	4.6100e-003	1.0000e-005	0.0000	4.9100e-003
Energy	0.0241	0.2187	0.1837	1.3100e-003		0.0166	0.0166		0.0166	0.0166	0.0000	687.3537	687.3537	0.0231	8.2000e-003	690.3758
Mobile	0.4492	2.4013	5.3529	0.0186	1.4841	0.0153	1.4994	0.3977	0.0143	0.4120	0.0000	1,720.858 1	1,720.858 1	0.0894	0.0000	1,723.094 1
Waste						0.0000	0.0000		0.0000	0.0000	20.5711	0.0000	20.5711	1.2157	0.0000	50.9640
Water						0.0000	0.0000		0.0000	0.0000	1.4888	23.8882	25.3770	0.1539	3.8100e-003	30.3614
Total	1.2322	2.6200	5.5390	0.0199	1.4841	0.0319	1.5160	0.3977	0.0309	0.4286	22.0599	2,432.104 6	2,454.164 5	1.4822	0.0120	2,494.800 2

Breakers Hotel (1806-19) - South Coast AQMD Air District, Annual

2.2 Overall Operational**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.7589	2.0000e-005	2.3800e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	4.6100e-003	4.6100e-003	1.0000e-005	0.0000	4.9100e-003
Energy	0.0241	0.2187	0.1837	1.3100e-003		0.0166	0.0166		0.0166	0.0166	0.0000	687.3537	687.3537	0.0231	8.2000e-003	690.3758
Mobile	0.4492	2.4013	5.3529	0.0186	1.4841	0.0153	1.4994	0.3977	0.0143	0.4120	0.0000	1,720.8581	1,720.8581	0.0894	0.0000	1,723.0941
Waste						0.0000	0.0000		0.0000	0.0000	20.5711	0.0000	20.5711	1.2157	0.0000	50.9640
Water						0.0000	0.0000		0.0000	0.0000	1.4888	23.8882	25.3770	0.1539	3.8100e-003	30.3614
Total	1.2322	2.6200	5.5390	0.0199	1.4841	0.0319	1.5160	0.3977	0.0309	0.4286	22.0599	2,432.1046	2,454.1645	1.4822	0.0120	2,494.8002

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail**Construction Phase**

Breakers Hotel (1806-19) - South Coast AQMD Air District, Annual

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	3/1/2019	2/28/2019	5	0	
2	Site Preparation	Site Preparation	5/1/2020	5/28/2020	5	20	Victory Park
3	Grading	Grading	5/1/2020	5/28/2020	5	20	Victory Park
4	Building Construction	Building Construction	7/1/2019	7/1/2020	5	263	Breakers Hotel Addition
5	Paving	Paving	1/11/2020	8/13/2020	5	75	Victory Park
6	Architectural Coating	Architectural Coating	7/1/2019	5/1/2020	5	220	Breakers Hotel

Acres of Grading (Site Preparation Phase): 0.61

Acres of Grading (Grading Phase): 0.61

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 279,048; Non-Residential Outdoor: 93,016; Striped Parking Area: 0
(Architectural Coating – sqft)

OffRoad Equipment

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Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	1	6.00	9	0.56
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	1	6.00	89	0.20
Site Preparation	Graders	1	8.00	187	0.41
Paving	Pavers	1	6.00	130	0.42
Paving	Rollers	1	7.00	80	0.38
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Rubber Tired Dozers	1	6.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Grading	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Graders	1	6.00	187	0.41
Paving	Paving Equipment	1	8.00	132	0.36
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40
Building Construction	Welders	3	8.00	46	0.45
Grading	Excavators	2	6.00	158	0.38
Building Construction	Aerial Lifts	5	8.00	63	0.31
Building Construction	Cranes	1	8.00	231	0.29
Paving	Pumps	1	4.00	84	0.74

Trips and VMT

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Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	13.00	0.00	99.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	5	13.00	0.00	62.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	13	89.00	35.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2019

Unmitigated Construction On-Site

[illegible]

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3.2 Demolition - 2019

Unmitigated Construction Off-Site

[illegible]

Mitigated Construction On-Site

[illegible]

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3.2 Demolition - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

3.3 Site Preparation - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0530	0.0000	0.0530	0.0290	0.0000	0.0290	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0163	0.1835	0.0771	1.7000e-004		8.2100e-003	8.2100e-003		7.5500e-003	7.5500e-003	0.0000	15.1265	15.1265	4.8900e-003	0.0000	15.2488
Total	0.0163	0.1835	0.0771	1.7000e-004	0.0530	8.2100e-003	0.0612	0.0290	7.5500e-003	0.0366	0.0000	15.1265	15.1265	4.8900e-003	0.0000	15.2488

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3.3 Site Preparation - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.6000e-004	2.7000e-004	3.0300e-003	1.0000e-005	8.8000e-004	1.0000e-005	8.8000e-004	2.3000e-004	1.0000e-005	2.4000e-004	0.0000	0.7901	0.7901	2.0000e-005	0.0000	0.7907
Total	3.6000e-004	2.7000e-004	3.0300e-003	1.0000e-005	8.8000e-004	1.0000e-005	8.8000e-004	2.3000e-004	1.0000e-005	2.4000e-004	0.0000	0.7901	0.7901	2.0000e-005	0.0000	0.7907

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0530	0.0000	0.0530	0.0290	0.0000	0.0290	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0163	0.1835	0.0771	1.7000e-004		8.2100e-003	8.2100e-003		7.5500e-003	7.5500e-003	0.0000	15.1265	15.1265	4.8900e-003	0.0000	15.2488
Total	0.0163	0.1835	0.0771	1.7000e-004	0.0530	8.2100e-003	0.0612	0.0290	7.5500e-003	0.0366	0.0000	15.1265	15.1265	4.8900e-003	0.0000	15.2488

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3.3 Site Preparation - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.6000e-004	2.7000e-004	3.0300e-003	1.0000e-005	8.8000e-004	1.0000e-005	8.8000e-004	2.3000e-004	1.0000e-005	2.4000e-004	0.0000	0.7901	0.7901	2.0000e-005	0.0000	0.7907
Total	3.6000e-004	2.7000e-004	3.0300e-003	1.0000e-005	8.8000e-004	1.0000e-005	8.8000e-004	2.3000e-004	1.0000e-005	2.4000e-004	0.0000	0.7901	0.7901	2.0000e-005	0.0000	0.7907

3.4 Grading - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0455	0.0000	0.0455	0.0249	0.0000	0.0249	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0172	0.1872	0.1138	2.2000e-004		8.6100e-003	8.6100e-003		7.9200e-003	7.9200e-003	0.0000	19.2291	19.2291	6.2200e-003	0.0000	19.3846
Total	0.0172	0.1872	0.1138	2.2000e-004	0.0455	8.6100e-003	0.0541	0.0249	7.9200e-003	0.0328	0.0000	19.2291	19.2291	6.2200e-003	0.0000	19.3846

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3.4 Grading - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.4000e-004	8.7000e-003	1.7300e-003	2.0000e-005	5.3000e-004	3.0000e-005	5.6000e-004	1.5000e-004	3.0000e-005	1.7000e-004	0.0000	2.3394	2.3394	1.6000e-004	0.0000	2.3434
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8000e-004	4.4000e-004	4.9200e-003	1.0000e-005	1.4300e-003	1.0000e-005	1.4400e-003	3.8000e-004	1.0000e-005	3.9000e-004	0.0000	1.2840	1.2840	4.0000e-005	0.0000	1.2849
Total	8.2000e-004	9.1400e-003	6.6500e-003	3.0000e-005	1.9600e-003	4.0000e-005	2.0000e-003	5.3000e-004	4.0000e-005	5.6000e-004	0.0000	3.6234	3.6234	2.0000e-004	0.0000	3.6283

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0455	0.0000	0.0455	0.0249	0.0000	0.0249	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0172	0.1872	0.1138	2.2000e-004		8.6100e-003	8.6100e-003		7.9200e-003	7.9200e-003	0.0000	19.2291	19.2291	6.2200e-003	0.0000	19.3846
Total	0.0172	0.1872	0.1138	2.2000e-004	0.0455	8.6100e-003	0.0541	0.0249	7.9200e-003	0.0328	0.0000	19.2291	19.2291	6.2200e-003	0.0000	19.3846

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3.4 Grading - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.4000e-004	8.7000e-003	1.7300e-003	2.0000e-005	5.3000e-004	3.0000e-005	5.6000e-004	1.5000e-004	3.0000e-005	1.7000e-004	0.0000	2.3394	2.3394	1.6000e-004	0.0000	2.3434
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8000e-004	4.4000e-004	4.9200e-003	1.0000e-005	1.4300e-003	1.0000e-005	1.4400e-003	3.8000e-004	1.0000e-005	3.9000e-004	0.0000	1.2840	1.2840	4.0000e-005	0.0000	1.2849
Total	8.2000e-004	9.1400e-003	6.6500e-003	3.0000e-005	1.9600e-003	4.0000e-005	2.0000e-003	5.3000e-004	4.0000e-005	5.6000e-004	0.0000	3.6234	3.6234	2.0000e-004	0.0000	3.6283

3.5 Building Construction - 2019**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1964	1.6719	1.3990	2.3800e-003		0.0826	0.0826		0.0788	0.0788	0.0000	204.2807	204.2807	0.0496	0.0000	205.5215
Total	0.1964	1.6719	1.3990	2.3800e-003		0.0826	0.0826		0.0788	0.0788	0.0000	204.2807	204.2807	0.0496	0.0000	205.5215

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3.5 Building Construction - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	9.0700e-003	0.2694	0.0675	5.9000e-004	0.0146	1.7600e-003	0.0163	4.2000e-003	1.6900e-003	5.8900e-003	0.0000	57.1889	57.1889	3.9600e-003	0.0000	57.2878
Worker	0.0284	0.0225	0.2449	6.6000e-004	0.0645	5.1000e-004	0.0650	0.0171	4.7000e-004	0.0176	0.0000	59.8732	59.8732	1.8700e-003	0.0000	59.9200
Total	0.0374	0.2919	0.3124	1.2500e-003	0.0790	2.2700e-003	0.0813	0.0213	2.1600e-003	0.0235	0.0000	117.0621	117.0621	5.8300e-003	0.0000	117.2078

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1964	1.6719	1.3990	2.3800e-003		0.0826	0.0826		0.0788	0.0788	0.0000	204.2805	204.2805	0.0496	0.0000	205.5213
Total	0.1964	1.6719	1.3990	2.3800e-003		0.0826	0.0826		0.0788	0.0788	0.0000	204.2805	204.2805	0.0496	0.0000	205.5213

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3.5 Building Construction - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	9.0700e-003	0.2694	0.0675	5.9000e-004	0.0146	1.7600e-003	0.0163	4.2000e-003	1.6900e-003	5.8900e-003	0.0000	57.1889	57.1889	3.9600e-003	0.0000	57.2878
Worker	0.0284	0.0225	0.2449	6.6000e-004	0.0645	5.1000e-004	0.0650	0.0171	4.7000e-004	0.0176	0.0000	59.8732	59.8732	1.8700e-003	0.0000	59.9200
Total	0.0374	0.2919	0.3124	1.2500e-003	0.0790	2.2700e-003	0.0813	0.0213	2.1600e-003	0.0235	0.0000	117.0621	117.0621	5.8300e-003	0.0000	117.2078

3.5 Building Construction - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1754	1.5290	1.3578	2.3700e-003		0.0713	0.0713		0.0680	0.0680	0.0000	199.9305	199.9305	0.0483	0.0000	201.1374
Total	0.1754	1.5290	1.3578	2.3700e-003		0.0713	0.0713		0.0680	0.0680	0.0000	199.9305	199.9305	0.0483	0.0000	201.1374

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3.5 Building Construction - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	7.6800e-003	0.2447	0.0606	5.8000e-004	0.0145	1.2000e-003	0.0157	4.1700e-003	1.1500e-003	5.3200e-003	0.0000	56.3845	56.3845	3.7000e-003	0.0000	56.4770
Worker	0.0260	0.0200	0.2208	6.4000e-004	0.0640	4.9000e-004	0.0645	0.0170	4.6000e-004	0.0174	0.0000	57.5760	57.5760	1.6500e-003	0.0000	57.6173
Total	0.0337	0.2646	0.2814	1.2200e-003	0.0784	1.6900e-003	0.0801	0.0212	1.6100e-003	0.0228	0.0000	113.9605	113.9605	5.3500e-003	0.0000	114.0943

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1754	1.5290	1.3578	2.3700e-003		0.0713	0.0713		0.0680	0.0680	0.0000	199.9302	199.9302	0.0483	0.0000	201.1372
Total	0.1754	1.5290	1.3578	2.3700e-003		0.0713	0.0713		0.0680	0.0680	0.0000	199.9302	199.9302	0.0483	0.0000	201.1372

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3.5 Building Construction - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	7.6800e-003	0.2447	0.0606	5.8000e-004	0.0145	1.2000e-003	0.0157	4.1700e-003	1.1500e-003	5.3200e-003	0.0000	56.3845	56.3845	3.7000e-003	0.0000	56.4770
Worker	0.0260	0.0200	0.2208	6.4000e-004	0.0640	4.9000e-004	0.0645	0.0170	4.6000e-004	0.0174	0.0000	57.5760	57.5760	1.6500e-003	0.0000	57.6173
Total	0.0337	0.2646	0.2814	1.2200e-003	0.0784	1.6900e-003	0.0801	0.0212	1.6100e-003	0.0228	0.0000	113.9605	113.9605	5.3500e-003	0.0000	114.0943

3.6 Paving - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0810	0.7866	0.8283	1.3000e-003		0.0441	0.0441		0.0413	0.0413	0.0000	112.3564	112.3564	0.0300	0.0000	113.1069
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0810	0.7866	0.8283	1.3000e-003		0.0441	0.0441		0.0413	0.0413	0.0000	112.3564	112.3564	0.0300	0.0000	113.1069

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3.6 Paving - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.1600e-003	3.9500e-003	0.0437	1.3000e-004	0.0127	1.0000e-004	0.0128	3.3700e-003	9.0000e-005	3.4600e-003	0.0000	11.4075	11.4075	3.3000e-004	0.0000	11.4157
Total	5.1600e-003	3.9500e-003	0.0437	1.3000e-004	0.0127	1.0000e-004	0.0128	3.3700e-003	9.0000e-005	3.4600e-003	0.0000	11.4075	11.4075	3.3000e-004	0.0000	11.4157

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0810	0.7866	0.8283	1.3000e-003		0.0441	0.0441		0.0413	0.0413	0.0000	112.3562	112.3562	0.0300	0.0000	113.1068
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0810	0.7866	0.8283	1.3000e-003		0.0441	0.0441		0.0413	0.0413	0.0000	112.3562	112.3562	0.0300	0.0000	113.1068

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3.6 Paving - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.1600e-003	3.9500e-003	0.0437	1.3000e-004	0.0127	1.0000e-004	0.0128	3.3700e-003	9.0000e-005	3.4600e-003	0.0000	11.4075	11.4075	3.3000e-004	0.0000	11.4157
Total	5.1600e-003	3.9500e-003	0.0437	1.3000e-004	0.0127	1.0000e-004	0.0128	3.3700e-003	9.0000e-005	3.4600e-003	0.0000	11.4075	11.4075	3.3000e-004	0.0000	11.4157

3.7 Architectural Coating - 2019**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.5174					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0176	0.1211	0.1215	2.0000e-004		8.5000e-003	8.5000e-003		8.5000e-003	8.5000e-003	0.0000	16.8515	16.8515	1.4200e-003	0.0000	16.8871
Total	0.5349	0.1211	0.1215	2.0000e-004		8.5000e-003	8.5000e-003		8.5000e-003	8.5000e-003	0.0000	16.8515	16.8515	1.4200e-003	0.0000	16.8871

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3.7 Architectural Coating - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.7400e-003	4.5600e-003	0.0495	1.3000e-004	0.0130	1.0000e-004	0.0131	3.4600e-003	1.0000e-004	3.5600e-003	0.0000	12.1092	12.1092	3.8000e-004	0.0000	12.1187
Total	5.7400e-003	4.5600e-003	0.0495	1.3000e-004	0.0130	1.0000e-004	0.0131	3.4600e-003	1.0000e-004	3.5600e-003	0.0000	12.1092	12.1092	3.8000e-004	0.0000	12.1187

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.5174					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0176	0.1211	0.1215	2.0000e-004		8.5000e-003	8.5000e-003		8.5000e-003	8.5000e-003	0.0000	16.8515	16.8515	1.4200e-003	0.0000	16.8870
Total	0.5349	0.1211	0.1215	2.0000e-004		8.5000e-003	8.5000e-003		8.5000e-003	8.5000e-003	0.0000	16.8515	16.8515	1.4200e-003	0.0000	16.8870

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3.7 Architectural Coating - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.7400e-003	4.5600e-003	0.0495	1.3000e-004	0.0130	1.0000e-004	0.0131	3.4600e-003	1.0000e-004	3.5600e-003	0.0000	12.1092	12.1092	3.8000e-004	0.0000	12.1187
Total	5.7400e-003	4.5600e-003	0.0495	1.3000e-004	0.0130	1.0000e-004	0.0131	3.4600e-003	1.0000e-004	3.5600e-003	0.0000	12.1092	12.1092	3.8000e-004	0.0000	12.1187

3.7 Architectural Coating - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.3449					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0107	0.0741	0.0806	1.3000e-004		4.8800e-003	4.8800e-003		4.8800e-003	4.8800e-003	0.0000	11.2343	11.2343	8.7000e-004	0.0000	11.2561
Total	0.3556	0.0741	0.0806	1.3000e-004		4.8800e-003	4.8800e-003		4.8800e-003	4.8800e-003	0.0000	11.2343	11.2343	8.7000e-004	0.0000	11.2561

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3.7 Architectural Coating - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.5400e-003	2.7100e-003	0.0300	9.0000e-005	8.6900e-003	7.0000e-005	8.7600e-003	2.3100e-003	6.0000e-005	2.3700e-003	0.0000	7.8223	7.8223	2.2000e-004	0.0000	7.8279
Total	3.5400e-003	2.7100e-003	0.0300	9.0000e-005	8.6900e-003	7.0000e-005	8.7600e-003	2.3100e-003	6.0000e-005	2.3700e-003	0.0000	7.8223	7.8223	2.2000e-004	0.0000	7.8279

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.3449					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0107	0.0741	0.0806	1.3000e-004		4.8800e-003	4.8800e-003		4.8800e-003	4.8800e-003	0.0000	11.2343	11.2343	8.7000e-004	0.0000	11.2561
Total	0.3556	0.0741	0.0806	1.3000e-004		4.8800e-003	4.8800e-003		4.8800e-003	4.8800e-003	0.0000	11.2343	11.2343	8.7000e-004	0.0000	11.2561

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3.7 Architectural Coating - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.5400e-003	2.7100e-003	0.0300	9.0000e-005	8.6900e-003	7.0000e-005	8.7600e-003	2.3100e-003	6.0000e-005	2.3700e-003	0.0000	7.8223	7.8223	2.2000e-004	0.0000	7.8279
Total	3.5400e-003	2.7100e-003	0.0300	9.0000e-005	8.6900e-003	7.0000e-005	8.7600e-003	2.3100e-003	6.0000e-005	2.3700e-003	0.0000	7.8223	7.8223	2.2000e-004	0.0000	7.8279

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.4492	2.4013	5.3529	0.0186	1.4841	0.0153	1.4994	0.3977	0.0143	0.4120	0.0000	1,720.858 1	1,720.858 1	0.0894	0.0000	1,723.094 1
Unmitigated	0.4492	2.4013	5.3529	0.0186	1.4841	0.0153	1.4994	0.3977	0.0143	0.4120	0.0000	1,720.858 1	1,720.858 1	0.0894	0.0000	1,723.094 1

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
City Park	1.15	13.88	10.21	12,272	12,272
Hotel	1,631.70	1,631.70	1,631.70	3,893,515	3,893,515
Total	1,632.85	1,645.58	1,641.91	3,905,787	3,905,787

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
City Park	16.60	8.40	6.90	33.00	48.00	19.00	66	28	6
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
City Park	0.548858	0.043235	0.200706	0.120309	0.016131	0.005851	0.021034	0.033479	0.002070	0.001877	0.004817	0.000707	0.000925
Hotel	0.548858	0.043235	0.200706	0.120309	0.016131	0.005851	0.021034	0.033479	0.002070	0.001877	0.004817	0.000707	0.000925

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5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	449.2953	449.2953	0.0186	3.8400e-003	450.9026
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	449.2953	449.2953	0.0186	3.8400e-003	450.9026
NaturalGas Mitigated	0.0241	0.2187	0.1837	1.3100e-003		0.0166	0.0166		0.0166	0.0166	0.0000	238.0585	238.0585	4.5600e-003	4.3600e-003	239.4731
NaturalGas Unmitigated	0.0241	0.2187	0.1837	1.3100e-003		0.0166	0.0166		0.0166	0.0166	0.0000	238.0585	238.0585	4.5600e-003	4.3600e-003	239.4731

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5.2 Energy by Land Use - NaturalGas**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hotel	4.46105e+006	0.0241	0.2187	0.1837	1.3100e-003		0.0166	0.0166		0.0166	0.0166	0.0000	238.0585	238.0585	4.5600e-003	4.3600e-003	239.4731
Total		0.0241	0.2187	0.1837	1.3100e-003		0.0166	0.0166		0.0166	0.0166	0.0000	238.0585	238.0585	4.5600e-003	4.3600e-003	239.4731

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hotel	4.46105e+006	0.0241	0.2187	0.1837	1.3100e-003		0.0166	0.0166		0.0166	0.0166	0.0000	238.0585	238.0585	4.5600e-003	4.3600e-003	239.4731
Total		0.0241	0.2187	0.1837	1.3100e-003		0.0166	0.0166		0.0166	0.0166	0.0000	238.0585	238.0585	4.5600e-003	4.3600e-003	239.4731

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5.3 Energy by Land Use - Electricity**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
City Park	0	0.0000	0.0000	0.0000	0.0000
Hotel	1.41012e+006	449.2953	0.0186	3.8400e-003	450.9026
Total		449.2953	0.0186	3.8400e-003	450.9026

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
City Park	0	0.0000	0.0000	0.0000	0.0000
Hotel	1.41012e+006	449.2953	0.0186	3.8400e-003	450.9026
Total		449.2953	0.0186	3.8400e-003	450.9026

6.0 Area Detail**6.1 Mitigation Measures Area**

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.7589	2.0000e-005	2.3800e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	4.6100e-003	4.6100e-003	1.0000e-005	0.0000	4.9100e-003
Unmitigated	0.7589	2.0000e-005	2.3800e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	4.6100e-003	4.6100e-003	1.0000e-005	0.0000	4.9100e-003

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0862					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.6725					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.2000e-004	2.0000e-005	2.3800e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	4.6100e-003	4.6100e-003	1.0000e-005	0.0000	4.9100e-003
Total	0.7589	2.0000e-005	2.3800e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	4.6100e-003	4.6100e-003	1.0000e-005	0.0000	4.9100e-003

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6.2 Area by SubCategory**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0862					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.6725					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.2000e-004	2.0000e-005	2.3800e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	4.6100e-003	4.6100e-003	1.0000e-005	0.0000	4.9100e-003
Total	0.7589	2.0000e-005	2.3800e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	4.6100e-003	4.6100e-003	1.0000e-005	0.0000	4.9100e-003

7.0 Water Detail**7.1 Mitigation Measures Water**

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	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	25.3770	0.1539	3.8100e-003	30.3614
Unmitigated	25.3770	0.1539	3.8100e-003	30.3614

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
City Park	0 / 0.726804	2.5728	1.1000e-004	2.0000e-005	2.5820
Hotel	4.69285 / 0.521428	22.8042	0.1538	3.7900e-003	27.7793
Total		25.3770	0.1539	3.8100e-003	30.3613

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7.2 Water by Land Use**Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
City Park	0 / 0.726804	2.5728	1.1000e-004	2.0000e-005	2.5820
Hotel	4.69285 / 0.521428	22.8042	0.1538	3.7900e-003	27.7793
Total		25.3770	0.1539	3.8100e-003	30.3613

8.0 Waste Detail**8.1 Mitigation Measures Waste****Category/Year**

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	20.5711	1.2157	0.0000	50.9640
Unmitigated	20.5711	1.2157	0.0000	50.9640

Breakers Hotel (1806-19) - South Coast AQMD Air District, Annual

8.2 Waste by Land Use**Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
City Park	0.05	0.0102	6.0000e-004	0.0000	0.0252
Hotel	101.29	20.5610	1.2151	0.0000	50.9389
Total		20.5711	1.2157	0.0000	50.9640

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
City Park	0.05	0.0102	6.0000e-004	0.0000	0.0252
Hotel	101.29	20.5610	1.2151	0.0000	50.9389
Total		20.5711	1.2157	0.0000	50.9640

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
----------------	--------	-----------	-----------	-------------	-------------	-----------

Breakers Hotel (1806-19) - South Coast AQMD Air District, Annual

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
----------------	--------	-----------	------------	-------------	-------------	-----------

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
----------------	--------

11.0 Vegetation

Lower Cost Overnight Visitor Serving Accommodations (LCOVA) Mitigation

A Technical Report for the City of Long Beach

October 30, 2015
Administrative Draft

Abstract

Section 30213 of California Coastal Act requires the California Coastal Commission (“CCC”) to protect, encourage, and, where feasible, provide for lower cost overnight visitor accommodations (“LCOVA”) along the State’s coast. As a mitigation measure consistent with this charge, the CCC has, in certain cases, imposed a \$30,000 fee for 25 percent of rooms of new hotel developments that are determined to be high cost (“\$30,000/25% fee”), in-lieu of providing on-site LCOVA facilities. Generally, the CCC has applied this fee in two circumstances: (1) As an ad hoc fee charged to developers upon CCC review of coastal development permit applications, and (2) as a legislatively imposed fee to be adopted by coastal jurisdictions upon CCC certification of a Local Coastal Program or related policy. The City of Long Beach (“City”) requested Lisa Wise Consulting, Inc. to prepare this report to serve as a comprehensive, technical foundation for the City’s subsequent goals, policies, and programs concerning LCOVA mitigation, particularly in relation to the \$30,000/25% fee. Broadly, this report is composed of four parts: Policy analysis, data analysis, legal analysis, and recommendations. Ultimately, this report concludes that the CCC’s \$30,000/25% fee is not an advisable measure for application in Long Beach. (The legal analysis presented in this report does not constitute legal advice and is reserved for review by the city attorney.)

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Chapter 1. Introduction

The City of Long Beach (“City” or “Long Beach”) is an urban coastal community in southwest Los Angeles County located approximately 20 miles south Downtown Los Angeles. The City is roughly 52 square miles, and includes eleven miles of Pacific Ocean shoreline. In 1980, Long Beach’s Local Coastal Program (“LCP”) was first adopted by the City Council and certified by the California Coastal Commission (“CCC”).¹ Like other California coastal jurisdictions, Long Beach faces a number of challenging issues related to land use and economics in the Coastal Zone.

Prepared by Lisa Wise Consulting, Inc. at the request of the City, this report concerns the issue of lower cost overnight visitor serving accommodations (“LCOVA”) mitigation in California Coastal Zone. This chapter explains the issue’s background the report’s purpose and structure.

1.1. Background

Section 30213 of California Coastal Act requires the CCC to protect, encourage, and, where feasible, provide for LCOVA facilities along the State’s coast.² As a mitigation measure per Section 30213, the CCC requires certain hotel and other development projects to include LCOVA facilities or pay an in-lieu fee. From 1977 to 2014, the CCC required over \$25 million for such in-lieu fees across over 30 cases.³

In 2006, the CCC conducted a workshop that studied hotel affordability along the California coast. The study showed that only 7.9 percent of hotels in the State’s nine most popular coastal counties were of low-cost.⁴ Given its charge to provide for LCOVA, the CCC revisited its related mitigation measure and in-lieu fees. Since 2006, the CCC has generally applied a three-prong approach (explained in detail in Chapter 2) that results in the imposition of a \$30,000 fee for 25 percent of hotel rooms determined to be higher cost (“\$30,000/25% fee”). Generally, the CCC has imposed this fee in two circumstances:

-
1. City of Long Beach, *Local Coastal Program*, (Long Beach, CA, 1980).
 2. Cal. Pub. Res. Code § 30213. The California Coastal Act is codified in the Cal. Public Res. Code §§ 30000, et seq.
 3. California Coastal Commission, *Public Workshop: Lower Cost Visitor Serving Accommodations Final Agenda (December 10, 2014)*, W3-12-2014, (San Francisco, CA, 2014), 19.
 4. California Coastal Commission, South Coast Area Office, *Major Amendment Request No. LOB-MAJ-1-10 (1-10) to the City of Long Beach Certified Local Coastal Program. For Public Hearing and Commission action at the Commission’s June 16, 2011 Meeting in Marina del Ray*, by John Ainsworth, Gary Timm, and Charles Posner, Th18a-6-2011, (Long Beach, CA, 2011), 33. This staff report concerns the Long Beach LCP Amendment, which is the second case study presented in Chapter 4 of this report.

1. Upon review of coastal development permit (“CDP”) applications, the CCC will require selected development projects to pay the \$30,000/25% fee as a condition of permit approval.
2. Upon review of an LCP or related policy, the CCC will require that cities or other jurisdictions adopt and enforce the \$30,000/25% fee.

Further, the CCC “has required mitigation for use of land that would have been available for lower cost and visitor serving facilities,” meaning the CCC has imposed this fee for proposed hotel developments, whether or not they replace an existing low-cost hotel.⁵

As discussed below, Long Beach enacted LCOVA mitigation, including a legislatively-imposed version of the \$30,000/25% fee, as a condition of CCC-approval of an LCP amendment. Further, as other coastal jurisdictions faced similar requirements by the CCC, the issue of LCOVA mitigation has grown into a major point of contention surrounding coastal development.

1.1.1. LCOVA Mitigation in Long Beach

In 2011, the Long Beach amended its LCP to modify and adopt new land use standards for the Downtown Shoreline Planned Development District (PD-6).⁶ The amendment, enacted by City of Long Beach Ordinance ORD-11-0017, divides Subarea 1 of PD-6 into Subareas 1 and 1a.⁷ The amendment also incorporates the Golden Shore Master Plan into Subarea 1a.⁸ As a condition of approval by the CCC, the amendment adopts LCOVA mitigation measures for Subarea 1a.⁹ These measures include:

- A one-time \$1.5 million fee should a hotel of at least 100 rooms not be built in Subarea 1a during the first two phases of the Golden Shore Master Plan,¹⁰ and
- A LCOVA mitigation measure that requires any proposed non-LCOVA hotel development in Subarea 1a to either pay an in-lieu fee of \$30,000 for 25 percent of rooms or provide LCOVA facilities elsewhere (i.e., a legislatively imposed version of the \$30,000/25% fee).¹¹

5. Ibid., 32.

6. Long Beach, California, Ordinance No. ORD-11-0017.

7. Ibid., 15.

8. Ibid.

9. South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 13.

10. Long Beach, California, Ordinance No. ORD-11-0017, 16-17.

11. Ibid., 17-18.

1.1.2. LCOVA Mitigation as an Issue

The CCC's LCOVA mitigation policy and practices have surfaced as a contentious issue in coastal zone planning and development. At a July 10, 2014, CCC hearing, the imposition of a LCOVA mitigation measure drew critique from both the project applicant and CCC Commissioners. At issue was the Port of San Diego's Port Master Plan amendment accommodating construction of three hotels totaling 500 rooms along Harbor Island.¹² In the project's staff report, the CCC staff recommended the following mitigation requirement:

A minimum of one-third (166 units) of the new 500 hotel rooms on East Harbor Island will be lower-cost overnight accommodations. As a special condition of the coastal development permit for any hotel development, redevelopment or change in lease that adds hotel rooms to East Harbor Island, the hotel developer will develop or designate its fair-share of on-site or off-site lower-cost overnight accommodations or pay an in-lieu fee based on a study conducted by the District that will designate the location and timeframe for construction of lower-cost accommodations within or adjacent to the District. An alternate location for the lower cost overnight accommodations required in this subarea may be considered through a future OMOA, pursuant to the results of the study.¹³

Facing the above requirement, the Port withdrew its application to amend its Port Master Plan. The event was reported as follows:

As the coastal commissioners prepared to vote on the matter following a lengthy public hearing, a port official told the commissioners it was withdrawing its application. The unexpected request came as several commissioners expressed reservations about moving ahead on a project when there is no firm agreement on an affordable lodging policy. "This has been a primary concern of mine as well," said Commissioner Martha McClure. "This is our third hotel development in the last year. For the commission to be 40 years old and not have a defined policy on this, we've come up short. We need a policy on this before we put it on the shoulder of developers."¹⁴

Despite the commissioner's sentiments, it is not entirely the case that the CCC lacks a "defined policy" as to LCOVA mitigation. At the second of two public workshops conducted on this issue,¹⁵ CCC Executive Director Charles Lester explained that the CCC's "policy" on this

12. Lori Weinberg, "Harbor Island Hotel Faces Delay," *San Diego Union-Tribune*, July 9, 2014, accessed July 25, 2014, <http://www.utsandiego.com/news/2014/Jul/09/harbor-island-hotel-delayed-coastal-commission/>

13. California Coastal Commission, San Diego Area Office, *Staff Recommendation on San Diego Unified Port District Port Master Plan Amendment No. 46 (PMP-6-PSD-14-0002-6) East Harbor Island. For Commission consideration and possible action at the Meeting of July 9-11, 2014*, by Sherilyn Sarb, Deborah Lee, Amanda Sackett, W18b-7-2014, (San Diego, CA, 2014), 22.

14. Weinberg, "Harbor Island Hotel Faces Delay."

15. California Coastal Commission, *Public Workshop: Lower Cost Visitor Serving Accommodations (December 10, 2014)*; California Coastal Commission, *Public Workshop: Lower Cost Visitor Serving Accommodations Final Agenda (March 13, 2014)*, F9-3-2015, (San Francisco, CA, 2015).

issue is defined by statute in Section 30213.¹⁶ Considering Lester's statement, perhaps commissioner's sentiments would be better attributed to the CCC's efforts to enforce the LCOVA mitigation policy. But according to the reporting above, the Port withdrew its application not because it viewed the would-be LCOVA mitigation requirement was vague; the requirement was clear, but unacceptable to the Port.

Further, the CCC's imposition of LCOVA in-lieu fees (i.e., the \$30,000/25% fee) have been questioned as potentially inconsistent with standards governing such conditions. On October 9, 2015, the Port of San Diego filed suit against the CCC for failing approve the Port Master Plan Amendment over the LCOVA mitigation issue.¹⁷

1.2. Purpose and Structure

The purpose of this report is to serve as a comprehensive, technical foundation for Long Beach's subsequent goals, policies, and programs concerning LCOVA mitigation, particularly in relation to the \$30,000/25% fee. Broadly, this report is composed of four parts: Policy analysis, data analysis, legal analysis, and recommendations. (The legal analysis presented in this report does not constitute legal advice and is reserved for review by the city attorney.)

1. **Policy Analysis:** Chapters 2, 3, and 4 explore the CCC's determination and application of its LCOVA mitigation policy and \$30,000/25% fee. Chapter 2 provides a brief background on the CCC's establishment and organization as well as the development of the LCOVA mitigation policy. Chapter 3 dissects the CCC's approach to determining the \$30,000/25% fee and examines its constituent components. Chapter 4 identifies variation and flexibility of this approach across four case studies.
2. **Data Analysis:** Chapter 5 presents data for average rates for coastal hotels in the City of Long Beach, Los Angeles County, Orange County, and all California Coastal Counties in-aggregate. Metrics generated from this data offer a quantitative context for examining application of LCOVA mitigation in Long Beach.
3. **Legal Analysis:** Chapters 6 and 7 consider the legality of the \$30,000/25% fee. Chapter 6 discusses the Federal and California legal standards for review of in-lieu fees. Chapter 7 applies these standards to the \$30,000/25% fee when required upon case-by case permit review or when imposed legislatively by

16. California Coastal Commission, *Friday, March 13, 2015 9:00 A.M.: Public Workshop: Lower Cost Visitor Serving Accommodations* (Video), Accessed April 15, 2015, Retrieved from <http://www.cal-span.org/cgi-bin/archive.php?owner=CCC&date=2015-03-13&player=jwplayer&captions=>

17. Roger Showley, "Port Sues Coastal Commission Over Hotel," *San Diego Union-Tribune*, October 9, 2015, accessed October 9, 2015, <http://www.sandiegouniontribune.com/news/2015/oct/09/port-coastal-sunroad-hotel/>

jurisdictions, generally and in Long Beach, specifically. (The legal analysis presented in this report does not constitute legal advice and is reserved for review by the city attorney.)

4. **Recommendations:** Chapter 8 recommends actions the City may take when facing a CCC-required fee, after adoption of a CCC-required fee, and when offering input on this issue to the CCC.

Ultimately, this report concludes that the CCC's \$30,000/25% fee likely fails the applicable legal standards and is not an advisable measure for application in Long Beach.

Chapter 2. The CCC and LCOVA Mitigation Policy

The CCC was first established in 1972 after California voters passed Proposition 20, and was made permanent by the state legislature in 1976 by adoption of the Coastal Act.¹⁸ The CCC regulates land use and development within the California Coastal Zone.¹⁹ The Coastal Zone stretches across the state's coast and generally extends inland 1,000 yards.²⁰ 15 counties are included in the Coastal Zone (from north to south):

- Del Norte,
- Humboldt,
- Mendocino,
- Sonoma, Marin,
- San Francisco,
- San Mateo,
- Santa Cruz,
- Monterey,
- San Luis Obispo,
- Santa Barbara,
- Ventura,
- Los Angeles,
- Orange, and
- San Diego.

The CCC itself is comprised of 12 voting members and three non-voting members.²¹ The 12 voting members are appointed by the Governor, Senate Rules Committee, or the Speaker of the Assembly and include six local elected officials (e.g., city council members, county

18. California Coastal Commission, "What We Do: Program Overview," last modified 2015, <http://www.coastal.ca.gov/whoweare.html>

19. Cal. Pub. Res. Code § 30103(a). "'Coastal zone' means that land and water area of the State of California from the Oregon border to the border of the Republic of Mexico, specified on the maps identified and set forth in Section 17 of that chapter of the Statutes of the 1975-76 Regular Session enacting this division, extending seaward to the state's outer limit of jurisdiction, including all offshore islands, and extending inland generally 1,000 yards from the mean high tide line of the sea. In significant coastal estuarine, habitat, and recreational areas it extends inland to the first major ridgeline paralleling the sea or five miles from the mean high tide line of the sea, whichever is less, and in developed urban areas the zone generally extends inland less than 1,000 yards. The coastal zone does not include the area of jurisdiction of the San Francisco Bay Conservation and Development Commission, established pursuant to Title 7.2 (commencing with Section 66600) of the Government Code, nor any area contiguous thereto, including any river, stream, tributary, creek, or flood control or drainage channel flowing into such area" (ibid.).

20. Ibid.

21. California Coastal Commission, "Commissioners & Alternates," last modified 2015, <http://www.coastal.ca.gov/roster.html>

supervisors, etc.) and six members of the public.²² The three non-voting members include Secretaries of the Resources Agency, the Business and Transportation Agency, and the Chair of the State Lands Commission.²³ The commission members are supported by an extensive staff lead by the Executive Director.²⁴

In exercising its functions, particularly review and issuance of CDPs and LCPs, the CCC effectuates its LCOVA mitigation policy. These functions and policy are described below.

2.1. Functions of the CCC

For purposes of this report, the two most relevant functions of the CCC are to review and issue CDPs and to approve new and amended LCPs.

2.1.1. Coastal Development Permits

For development projects falling in the CCC's original jurisdiction (i.e., not covered by an LCP (discussed below)), the developer must apply to the CCC for a CDP. According to the CCC, "[p]ermit application review requires CCC staff to analyze the complete permit application and prepare a staff report including recommendations for Commission action. In addition, the CCC receives notice of all pending local coastal development permits."²⁵

2.1.2. Local Coastal Programs

As explained by the CCC, "Local Coastal Programs (LCPs) are basic planning tools used by local governments to guide development in the coastal zone, in partnership with the Coastal Commission."²⁶ Once certified by the CCC, an LCP authorizes its municipality to issue coastal permits in a manner consistent with the Coastal Act and the LCP.²⁷ However, CCC may retake CDP issuance authority, and commonly does, under Sections 30603 (grounds and process by which a local government action may be appealed to the CCC)²⁸ and 30624 (grounds and process by which the CCC executive director may issue permits in emergency and non-

22. Ibid.

23. Ibid.

24. California Coastal Commission, "Commissioner Biographies," last modified 2015, <http://www.coastal.ca.gov/bios.html>

25. California Coastal Commission, "Procedural Guidance for the Review of Wetland Projects in California's Coastal Zone: Chapter 1 - Coastal Development Review Process," last modified June 15, 1994, <http://www.coastal.ca.gov/wetrev/wetttitle.html>

26. California Coastal Commission, "Local Coastal Programs (LCPs)," last modified 2015, <http://www.coastal.ca.gov/lcps.html>

27. California Coastal Commission, *Local Coastal Program (LCP) Update Guide*, (San Francisco, CA, 2013), 2.

28. Cal. Pub. Res. Code § 30603.

emergency cases).²⁹ Sections 30500, et seq. outline the substantive and procedural requirements for LCPs.³⁰ The two major components of an LCP are a land use plan and an implementation plan.³¹ As discussed below, the LCPs must meet comply with the CCC's policy towards LCOVA set forth by Section 30213.³²

2.2. LCOVA Mitigation Policy

The first sentence of the CCC's vision statement addresses the LCOVA issue:

The California coast is available for all to enjoy through thousands of public accessways to and along the shoreline, a completed California Coastal Trail, a well-supported network of parks and open spaces, and a *wide range of visitor-serving facilities, including lower-cost campgrounds, hostels, and hotels* [Emphasis added].³³

The CCC's power to regulate LCOVA is established in in the Coastal Act, but the Act also includes express statutory limitations to this power.³⁴ The CCC exercises its regulatory authority in this realm by imposing the \$30,000/25% fee among other tools.³⁵ Below is a brief discussion of the statutes supporting and limiting the CCC's authority to regulate for LCOVA and the CCC's LCOVA mitigation toolbox.

2.2.1. Supporting Statutes

The CCC finds its authority to impose LCOVA regulations in two sections of the Coastal Act – 30213 and 30222.³⁶ Each statute is explained below.

29. Ibid. § 30624

30. Ibid. §§ 30500, et seq.

31. California Coastal Commission, "Local Coastal Programs (LCPs)."

32. California Coastal Commission, *Local Coastal Program (LCP) Update Guide*, 2.

33. California Coastal Commission, *California Coastal Commission Strategic Plan 2013-2018*, (San Francisco, CA, 2013), 7.

34. The constitutional principle underlying the CCC's regulatory authority – the police power – is discussed in Chapter 5 of this report.

35. The \$30,000/25% fee is not expressly prescribed in the Coastal Act (Cal. Public Resources Code, §§ 3000, et seq.) or in the Coastal Commission Regulations (Title 14 CCR, §§ 13001, et seq.). The \$30,000/25% fee and other LCOVA mitigation are practices by the CCC in an effort to effectuate the LCOVA mitigation policy set forth in Cal. Pub. Res. Code § 30213, discussed in this chapter.

36. Discussed in Chapter 6 of this report, §§ 30213 and 30222 form the foundation of the legitimate state interest supporting the LCOVA in-lieu fee.

2.2.1.1. Section 30213

Section 30213 is the CCC's policy statement concerning LCOVA mitigation. Section 30213 includes two paragraphs. The first paragraph, passed in 1976, grants the CCC authority to take action on the LCOVA issue:

Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.³⁷

The second paragraph, passed in 1981 as an amendment to the statute, limits that authority:

The commission shall not: (1) require that overnight room rentals be fixed at an amount certain for any privately owned and operated hotel, motel, or other similar visitor-serving facility located on either public or private lands; or (2) establish or approve any method for the identification of low or moderate income persons for the purpose of determining eligibility for overnight room rentals in any such facilities.³⁸

Initially, the CCC's actions under Section 30213 focused primarily on affordable housing development in the coastal zone.³⁹ The CCC also acted to regulate rates of new hotel and motel developments, "usually stipulate[ing] that some of the units be rented at reduced rates to people of moderate income."⁴⁰ The 1981 amendment⁴¹ responded to concerns that the CCC overreached in regulation of hotel development, and expressly prohibited the CCC from fixing room rates⁴² and permitting income identification as a rate determinant.

2.2.1.2. Section 30222

Section 30222 further solidifies the CCC's authority to address the LCOVA issue by prioritizing visitor-serving uses over non-visitor serving uses along in the coastal zone:

37. Cal. Pub. Res. Code § 30213.

38. Ibid.

39. Paul A. Sabatier and Daniel A. Mazmanian, *Can Regulation Work?: The Implementation of the 1972 California Coastal Initiative* (New York, NY: Plenum Press, 1983), 332.

40. Ibid., 333. "In a celebrated case involving two 300-unit hotels at Marine del Rey (Los Angeles), the commission accepted the owner's offer to reserve 45 rooms during weekends for low- and moderate-income people at no more than 50% of normal rates (with eligibility to be determined by guests' zip codes) in lieu of the commissions' more ambitious (and workable) proposal" (ibid.).

41. Ibid., 334. The 1981 amendment to § 30213 (SB 1581) was sponsored by State Senator Alan Sieroty, a democrat representing District 22 (ibid.). In 1971, representing District 59 in the state assembly, Sieroty carried AB 1471 – the substantive precursor to the California Coastal Act (ibid., 39).

42. A potential issue may be whether or not the \$30,000/25% fee constitutes rate fixing in violation of § 30213. It could be argued that the \$30,000/25% fee functions as a de-facto cap on room rates, in that the fee may discourage higher hotel room rates or incentivize lower hotel room rates. However, such results are likely not tantamount to the fixing of room rates, because the CCC is not strictly forbidding rates above or below a singular price point.

The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.⁴³

2.2.2. The LCOVA Mitigation Toolbox

The \$30,000/25% fee is not the only tool the CCC employs in furtherance of the LCOVA mitigation policy. These tools are forms of exactions—requirements imposed by the government as conditions of approval for a development permit in order to offset or mitigate public harms created by the development.⁴⁴ As a condition for approval, the government may either exact property (a property exaction) or money (a monetary exaction)⁴⁵ from the applicant.

The CCC's LCOVA mitigation property exaction tool is the on-site LCOVA facility development requirement. In a number of cases, the CCC required hotel developers to build a tent campground on-site to mitigate the perceived limited affordability of the hotel development.⁴⁶ The \$30,000/25% fee, the subject of this report, is the CCC's monetary exaction tool in LCOVA mitigation toolbox.

43. Cal. Pub. Res. Code § 30222.

44. The federal and California legal standards governing exactions are discussed in Chapter 6 of this report.

45. The two types of monetary exactions, ad hoc fees and legislatively imposed fee, are discussed in Chapter 6 of this report.

46. California Coastal Commission, *Public Workshop: Lower Cost Visitor Serving Accommodations* (December 10, 2014), 16-17. Cases where the CCC required on-site mitigation include: "1) Appeal No. A 71-78 for the City of Long Beach Convention Hotel resulted in 70 RV camping sites at the Golden Shore RV Resort. 2) Appeal No. 55-80 for Lifetime Communities/Santa Catalina Island Company resulted in 120 camping sites at Hermit Gulch Campground on Catalina Island. 3) CDP 3-82-171 for the Ventana Inn in Big Sur resulted in 100 camping sites at Ventana Campground. 4) Appeal No. A-3-SMC-89-063 for Gould, San Mateo County resulted in 112 RV sites and 76 tent camping sites at Costanoa, just south of Pigeon Point Lighthouse" (ibid.).

Chapter 3. LCOVA In-Lieu Fee Formulation

The CCC generally applies the following three-pronged approach to formulate the LCOVA in-lieu fee:

1. Define local lower, moderate, and higher cost rates,
2. Determine the per room in-lieu fee, and
3. Establish an in-lieu fee account.

This approach generally results in the CCC imposing the \$30,000/25% fee. This chapter dissects the above approach and explains its constituent elements. As discussed in Chapters 1 and 2, the CCC has imposed the \$30,000/25% fee in review of development permits as well as LCP and related policies. The CCC has not applied the three-prong approach uniformly across all cases. Chapter 4 delves into and highlights key variations in application of the three-prong approach.

3.1. Defining Local Low, Moderate, and High Cost Rates

In the past, the CCC generally considered a LCOVA hotel as one that charges \$100 or less per room per night.⁴⁷ First applied in the Ventura LCP Amendment case in 2008, the CCC now uses a formula to calculate three ranges of hotel costs—low, moderate, and high—in the relevant region.⁴⁸ These ranges are based on the statewide average daily rate (“ADR”) of California hotels. ADR is “[a] measure of the average rate paid for rooms sold, calculated by dividing room revenue by rooms sold.”⁴⁹

Discussed in further detail below, the formula involves three steps:

1. Determine the statewide ADR,
2. Set the geographic zone of local hotels surveyed, and
3. Identify the low, moderate, and high-cost ranges in the relevant local area.

The CCC’s in-lieu fee is triggered at the high-cost range. As noted below, the CCC considers some types of overnight accommodations to be “inherently lower cost” (i.e., LCOVA facilities):

47. California Coastal Commission, San Diego Area Office, *Addendum to Item Th16e, Coastal Commission Permit Application #6-13-0407 (McMillin-NTC, LLC), for the Commission Meeting of February 13, 2014, Th16e-2-2014* (San Diego, CA, 2014), 29. This staff report includes revised findings concerning the 2200 Lee Court Project in San Diego, CA, the fourth case study presented in this Chapter 4 of this report.

48. South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 33. “More recent Commission actions have utilized a formula that can be used to determine low and high cost overnight accommodations for a specific part of the coast [SBV-MAJ-2-08 & 5-98-156-A17]” (ibid.).

49. STR Global, “A Guide to Our Terminology,” last modified 2015, <https://www.strglobal.com/resources/glossary>

The formula is based on California hotel and motel accommodations (single room, up to double occupancy), and does not incorporate hostels, RV [recreation vehicle] parks, campgrounds or other alternative accommodations into the equation, as these facilities do not provide the same level of accommodation as hotels and motels. Hostels, RV parks, and campgrounds are inherently lower cost, and are the type of facilities that a mitigation charge for the loss of affordable overnight accommodations would support.⁵⁰

The CCC has recently reconsidered whether RV parks are “inherently low cost.” RV parks 2014 CCC staff report explains that RV sites may not always constitute LCOVA facilities after accounting for the cost of purchasing and maintaining the RV itself.⁵¹

3.1.1. Determine Statewide Hotel Average Daily Rate

In 2007, the CCC obtained the Statewide ADR from Smith Travel Research (“STR”) trend reports within the following parameters.

1. The survey included California hotels and motels (here, referred to collectively as “hotels”), participating in STR’s trend surveys, and
2. From that universe, considers only AAA Auto Club-rated properties (one, two, three, four, or five diamond) to ensure an acceptable level of quality.⁵²
3. The CCC used peak season (July and August) average monthly ADR.⁵³

Based on the STR data,⁵⁴ the CCC determined the Statewide ADR to be \$132.90 at peak season in 2007.⁵⁵ The CCC still relies on the 2007 Statewide ADR in cases today. According the CCC, the 2007 figure remains valid because the Statewide ADR has experienced little fluctuation since 2007 – falling to only \$128.93 in 2013.⁵⁶ However, it is unclear whether the 2013 \$128.93 ADR figure considered only AAA-rated properties. As detailed in Chapter 5, the Great Recession’s end in 2009 and hotel market’s upturn in 2014 likely rendered the CCC’s 2007 ADR and 2013 ADR irrelevant.

50. South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 33.

51. California Coastal Commission, *Public Workshop: Lower Cost Visitor Serving Accommodations (December 10, 2014)*, 9-10.

52. *Ibid.*

53. California Coastal Commission, South Coast Area Office, *Staff Report: Regular Calendar, Application No.: 5-13-0717, Applicant: 1429 Hermosa, LLC, F10a-6-2014* (Long Beach, CA, 2014), 17. This staff report addressed the permit application for a proposed 30-room boutique hotel to be constructed at 1429 Hermosa Avenue, Hermosa Beach, CA.

54. Interview with Smith Travel Research Trends Department Staff, August 21, 2014. The hotels included in the STR trend reports are typically of 10 rooms or more.

55. San Diego Area Office, *6-13-0407 (McMillin-NTC, LLC)*, 30.

56. *Ibid.*, 29-30.

3.1.2. Geographic Zone of Local Hotels Surveyed

With the Statewide ADR determined, the CCC builds an inventory of local hotels to survey. There are two steps to building the inventory. First, the CCC sets the geographic zone for hotels. This zone is defined by two characteristics:

1. The political boundary (the city or county), and
2. The distance from the coastline (the California Coastal Zone or Five-Miles from the coastline (the “Five-Mile Zone”).

The case studies in Chapter 4 will show that the CCC has varied in its application of these characteristics. Second, the CCC generally applies the following parameters to arrive at a list of hotels within the zone:

1. The CCC only surveys AAA-rated properties, and
2. The CCC considers rates during peak season (July and August).⁵⁷

3.1.3. Identify the Local Low, Moderate, and High Cost Ranges

Using the statewide and local ADR data, the CCC identifies the local low, moderate, and high-cost ranges using the following equations:

The CCC considers the aggregated ADR for local hotels that fall below the Statewide ADR (the “Local Low ADR”).⁵⁸ The Local Low ADR is divided by the Statewide ADR to generate, what this report refers to as, the Local ADR Quotient. 1 minus the Local ADR Quotient calculates a range (“Cost Range”) applied above and below the Statewide ADR to identify the lower, moderate, and higher cost ranges.

To better illustrate the CCC’s process described above, an expanded equation is shown in Figure 1.

57. South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 33.

58. San Diego Area Office, *6-13-0407 (McMillin-NTC, LLC)*, 31.

Statewide ADR = Determined by the CCC survey
 Local Low ADR = Local ADR for hotels surveyed with ADRs lower than the Statewide ADR
 Local ADR Quotient = Local ADR / Statewide ADR

 Cost Range = $(1 - \text{Local ADR Quotient}) * \text{Statewide ADR}$

 Local High Cost Point = Statewide ADR + Cost Range
 Local Low Cost Point = Statewide ADR – Cost Range *and* = Local Low ADR

 Local Low Cost Range < Local Low Coast Point
 Local Moderate Cost Range \geq Local Low Cost Point *and* \leq Local High Cost Point
 Local High Cost Range > Local High Cost Point

Figure 1. Expanded Equation for Local Low, Moderate, and High Cost Ranges

The equation in Figure 1 shows more steps than presented in CCC staff reports, but the additional steps are mathematically consistent with the CCC’s process. Figure 2 below shows the expanded equations using hypothetical values of \$100 for the Statewide ADR and \$90 for the Local Low ADR.

Statewide ADR = \$100
 Local Low ADR = \$90
 Local ADR Quotient = $\$90 / \$100 = 0.90$

 Cost Range = $(1 - 0.90) * \$100 = \10

 Local High Cost Point = $\$100 + \$10 = \$110$
 Local Low Cost Point = $\$100 - \$10 = \$90$ *and* = Local Low ADR

 Local Low Cost Range < \$90
 Local Moderate Cost Range \geq \$90 *and* \leq \$110

Figure 2. Expanded Equation Hypothetical

The expanded equation serves two purposes:

- Allows the CCC’s process to be diagrammed in Figure 3, and
- Provides a clearer comparison in its application across case studies in Chapter 4.

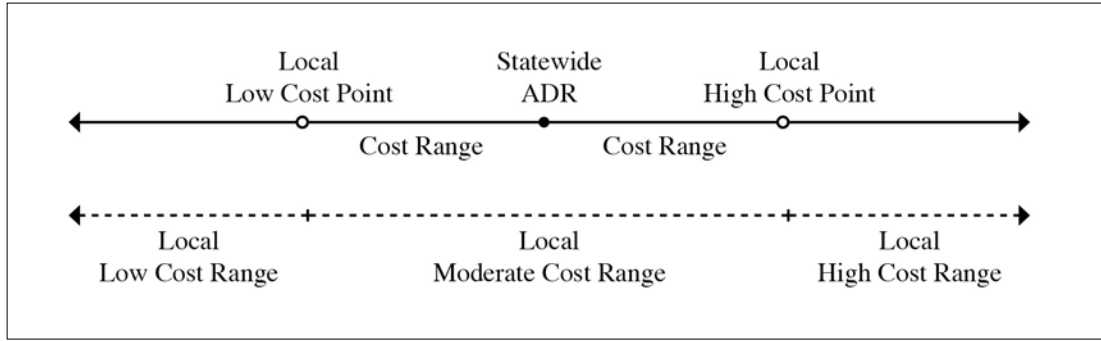


Figure 3. Diagram of Local Low, Moderate, and High Hotel Cost Ranges

The CCC’s trigger for imposing in-lieu fees is the Local High Cost Range—rates above the Local High Cost Point.⁵⁹ Table 1 below demonstrates this formula’s results from hypothetical proposed hotels:

Table 1. Hypothetical Applications of the CCC In-Lieu Fee Trigger Formula

Hotel	Local ADR	Local Low ADR	Statewide ADR	Local Quotient	Cost Range	Local High Cost Range
Hotel A	\$125	\$90	\$150	0.60	\$60	> \$210
Hotel B	\$130	\$100		0.67	\$50	> \$200
Hotel C	\$150	\$110		0.73	\$40	> \$190
Hotel D	\$140	\$120		0.80	\$30	> \$180

There is an inverse relationship between the Local Low ADR and the Local High Cost Range (the in-lieu fee trigger). Hotels in areas with lower Local Low ADRs will have a higher Local High Cost Range, meaning that the in-lieu fee is triggered at a higher rate. As discussed in the section below, the CCC typically imposes the \$30,000/25% fee. For example, Hotel A is proposed for an area with a Local Low ADR of \$90. Based on the formula, Hotel A’s developers would pay \$30,000 for 25 percent of rooms with rates greater than \$210. Hotel B, proposed in an area with a Local Low ADR of \$110 would trigger the in-lieu fee for rooms with rates greater than \$210. A higher High Cost Point likely means that fewer rooms will be penalized by the in-lieu fee.

The overall ADR for the local area is not a factor in the formula. Consider the following: Hotel C and Hotel D are proposed in areas with respective Local ADRs of \$150 and \$140. However, because Hotel C’s area’s Local Low ADR is lower than that of Hotel D’s area, Hotel C’s in-lieu fee is triggered at a higher point.

Further, because the equation only considers the ADR of local hotels below the Statewide ADR, the equation will in theory always produce a Local High Cost Point. Therefore,

59. South Coast Area Office, 5-13-0717, 1429 Hermosa, LLC, 18.

the equation will always trigger an in-lieu fee. Hotel A is proposed in an area with a Local ADR below the statewide average, but the formula still triggers an in-lieu fee for the development.

3.2. Determining the Per Room In-lieu Fee

In a number of decisions, the CCC imposed the \$30,000/25% fee (\$30,000 for 25% of rooms) for hotel projects' room rates that fall in the Local High Cost Range.⁶⁰ The CCC derived the \$30,000 figure from information provided to the CCC by Hostelling International ("HI") in a letter dated October 26, 2007.⁶¹ The CCC explains:

The figures provided by HI are based on two models for a 100-bed, 15,000 sq. ft. hostel facility in the Coastal Zone. The figures are based on experience with the existing 153-bed, HI-San Diego Downtown Hostel. Both models include construction costs for rehabilitation of an existing structure. The difference in the two models is that one includes the cost of purchase of the land and the other is based on operating a leased facility. Both models include "Hard" and "Soft Costs" and startup costs, but not operating costs. "Hard" costs include, among other things, the costs of purchasing the building and land and construction costs (including a construction cost contingency and performance bond for the contractor). "Soft" costs include, among other things, closing costs, architectural and engineering costs, construction management, permit fees, legal fees, furniture and equipment costs and marketing costs. Based on these figures, the total cost per bed for the two models ranges from \$18,300 for the leased facility to \$44,989 for the facility constructed on purchased land.⁶²

The CCC arrived at the \$30,000 amount by taking the rough average between the per bed costs in the two models.⁶³ In some cases, the CCC adjusts the fee to inflation.⁶⁴ From a review of case studies, Chapter 4 will show that there is some flexibility in application of the \$30,000/25% fee. Chapter 7 will explain that the 2007 HI letter is likely a conflicted source, due to HI's frequent receipt of LCOVA in-lieu fee funds.

3.3. Establishing an In-Lieu Fee Account

Finally, the CCC then requires the creation of an interest-bearing account to hold the in-lieu fees.⁶⁵ The fees are to be distributed as "grants to public agencies or non-profit

60. South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 35.

61. San Diego Area Office, *6-13-0407 (McMillin-NTC, LLC)*, 33.

62. *Ibid.*

63. California Coastal Commission, South Central Coast Area Office, *Agenda Items 11a and 11b, City of San Buenaventura Local Coastal Program (LCP) Amendment SBV-MAJ-1-08 [Midtown Corridor Development Code-Main Street and Thompson Boulevard] and SBV-MAJ-2-08 [Downtown Specific Plan] for Public Hearing and Commission Action at the California Coastal Commission hearing of November 5, 2009 in Long Beach, Th11a-11-2009* (Ventura, CA, 2009), 28. The City of Buenaventura commonly known as the City of Ventura. This staff report concerns the first case study presented in Chapter 4 of this report.

64. South Coast Area Office, *5-13-0717, 1429 Hermosa, LLC*, 18.

65. *Ibid.*

organizations for the provision of LCOVA facilities within or in close proximity to the coastal zone.”⁶⁶

In past actions, the CCC allowed the jurisdiction (e.g., the applying city) to select from a list of entities to manage the account.⁶⁷ The CCC Executive Director must approve the selection. These options have included:

- The jurisdiction itself,
- Hostelling International USA,
- California State Coastal Conservancy,
- California Department of Parks and Recreation, or
- A similar entity.⁶⁸

A management plan for the account must be reviewed and approved by the CCC Executive Director. The management plan must include:

- Details of how deposits into the account will be processed,
- Investment strategies to ensure a reasonable rate of return, and
- Guidelines for how grants for LCOVA facilities will be managed (i.e., applications, selection process, oversight).⁶⁹

There is some conflicting information regarding establishment of these accounts when required through an LCP update or similar application. CCC staff reports suggest that one account would be created to hold in-lieu fees for subsequent projects approved under the LCP.

66. Ibid.

67. Ibid., 9.

68. Ibid., 18.

69. Ibid., 9-10.

Chapter 4. Case Studies

Chapter 3 identified and detailed the CCC's three-prong approach for formulating the LCOVA in-lieu fee. This chapter reviews four case studies that highlight incidents of flexibility and variance by the CCC in applying this approach:

- **City of Ventura, LCP Amendment (2008):** This case represents the first instance where the CCC applied the three-prong approach. Further, this case highlights the CCC's possible openness to consider an alternative approach.
- **City of Long Beach, LCP Amendment (2010):** This case features two notable deviations from CCC's standard approach by using a small sample of hotels as the local inventory in a select part of the coast line and relying on another jurisdiction's data to set the in-lieu fee trigger.
- **City of Solana Beach, LCP Land Use Plan (2012):** In this case, the CCC delegated much of the local hotel inventory data procurement and cost range determination to the local jurisdiction.
- **City of San Diego, 220 Lee Court Project (2014):** Unlike the other three cases, this case study regards an individual development project. This case is of interest because the CCC exercised considerable flexibility in its determination of the per-room in-lieu fee.

The case studies are structured by its three-prong approach to the LCOVA in-lieu fee. Table 2 provides a summary of the findings:

Table 2. Summary of Case Study Findings

City of Ventura, LCP Amendment (2008)	City of Long Beach, LCP Amendment (2010)	City of Solana Beach, LCP Land Use Plan (2012)	City of San Diego, 2200 Lee Court Project (2014)
Defining Local Low, Moderate, and High Cost Hotel Rates			
Standard formula applied to hotels in the City of Ventura Coastal Zone.	Three variations: (1) only considered downtown coastline, (2) used a sampling of hotels, and (3) relied on comparisons to City of Ventura.	The CCC delegated accounting of hotel cost ranges to the City, stating that a suitable method would include an inventory of hotels in San Diego County within the Five-Mile Zone.	The CCC included two variations to the standard formula for the Statewide ADR and the Local High Cost Point. The relevant area included hotels in San Diego County within the Five-Mile Zone.
Determining the Per Room In-Lieu Fee			
\$30,000/25% fee applied, however the CCC shows some room for flexibility.	\$30,000/25% fee applied, with two exceptions: (1) \$1.5 million fee for a specific project and (2) provided an alternative mitigation to the \$30,000/25% fee.	\$30,000/25% fee applied, but adjusted for inflation.	The CCC imposed a \$30,000/12.5% fee given the development's proposed free amenities and accommodation of rooms for more guests.
Establishing an Account to Hold and Distribute In-Lieu Fees			
The City has yet to collect any in-lieu fees or establish an account.	Standard language on account creation.	According to City policy, the City will create and manage the account, but has yet to do so.	No direct call for creation of an account

4.1. City of Ventura, LCP Amendment (2008)

In 2008, The City of Ventura submitted an amendment to its LCP to the CCC for approval. As mentioned earlier, this case was the first instance in which CCC used the formula to determine low, moderate, and high-cost categories for hotel rooms in a particular locale.⁷⁰

4.1.1. Defining Local Low, Moderate, and High Cost Rates

The CCC applied the three-step formula as described in Chapter 3. For the second step, defining the geographic zone of local hotels for survey, the CCC used City of Ventura as the political boundary and “the City of Ventura Coastal Zone” for the distance from the coastline.⁷¹

70. South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 33.

71. South Central Coast Area Office, *City of San Buenaventura SBV-MAJ-2-08*, 20.

The staff report did not further specify distance from the coastline. The Higher Cost Point was subsequently defined as 25 percent greater than the Statewide ADR.⁷²

4.1.2. Determining the Per Room In-Lieu Fee

To receive approval for the LCP amendment, the CCC recommended that Ventura include the \$30,000/25% mitigation measure to provide for low-cost lodging.⁷³ Opposed to the broader general application of the \$30,000/25% fee above, Ventura requested, and the CCC agreed to consider, that an alternative local threshold be applied. However, according to a CCC staff report, Ventura staff failed to come forth with an alternative.⁷⁴

4.1.3. Establishing an In-Lieu Fee Account

According to City of Ventura staff, Ventura has yet to collect any LCOVA in-lieu fees from coastal development under the approved amendment and has not established an account for this purpose.⁷⁵

4.2. City of Long Beach, LCP Amendment (2010)

In 2010, the City of Long Beach submitted to the CCC an amendment to the City's LCP. The amendment concerned one designated area of the LCP: Downtown Shoreline Planned Development District (PD-6). The purpose of the amendment was to incorporate into PD-6 the Golden Shore Master Plan—a development project featuring new hotel construction.⁷⁶ Following certification by the CCC, the amendment was codified into ordinance.⁷⁷

4.2.1. Defining Local Low, Moderate, and High Cost Rates

In this case, the CCC strayed from the formula applied in the Ventura case in three ways:

1. Considering hotels in only one area of Long Beach's coastline,
2. Drawing only a sample of hotels from that area, and
3. Relying on a comparable city's (Ventura) data instead of applying the formula to Long Beach hotels. These variations are explained further below.

72. Ibid., 21.

73. Ibid., 3-4.

74. Ibid.

75. Interview with City of Ventura, Community Development Department Staff, July 24, 2014.

76. South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 1.

77. Long Beach, California, Ordinance No. ORD-11-0017.

First, the CCC looked at hotels within the Downtown Shoreline area.⁷⁸ This is a relatively narrower area than that used in the Ventura case (Coastal Zone the City of Ventura).

Second, the CCC considered only a sample of hotels in this area, explaining that “[a] similar comprehensive study [referencing the Ventura case] of all the hotels in Long Beach has not been conducted, although a sampling (2009) of the hotels in or near the Downtown Shoreline area has been done.”⁷⁹ The CCC staff report did not expand on the parameters. Based on this review, the CCC found that there are no affordable hotels within the Downtown Shoreline area.⁸⁰

Third, to determine the low, moderate, and high cost ranges, the CCC did not apply its formula to the sample drawn of Long Beach hotels in the Downtown Shoreline area. Instead, it relied on figures from the Ventura case. As explained in the CCC staff report:

The hotel room rates in Long Beach are similar to Ventura’s rates. Therefore, the definition of low cost accommodations in Long Beach will be defined (for the suggested modification pertaining to Subarea 1a) as those charging less than seventy-five percent (75%), or twenty- five percent (25%) below, the statewide average daily room rate during peak season.⁸¹

Like in the Ventura case, the local High Cost Point in the Long Beach Case was subsequently defined as 25 percent greater than the Statewide ADR.⁸²

4.2.2. Determining the Per Room In-Lieu Fee

The CCC applied the \$30,000/25% fee in the Long Beach case,⁸³ with two exceptions. The first exception is specific to the first to phases of the Golden Shore Master Plan:

A new hotel, with at least one hundred rooms, shall be provided as part of the first or second phase of the implementation of the Golden Shore Master Plan, or a mitigation charge of \$1.5 million shall be paid by the applicant into an interest-bearing account, to be established and managed by the City of Long Beach.⁸⁴

The CCC explained that “[t]he \$1.5 million mitigation charge is equivalent to the cost of a new 82-bed hostel (at \$18,300 a bed) on leased land.”⁸⁵ This diverges from the CCC’s practice in other cases in two respects: First, as described earlier in this report, the CCC arrived at the

78. Ibid., 34.

79. Ibid.

80. Ibid.

81. Ibid.

82. Ibid.

83. Ibid., 30, 36. Chapter 7 discusses how, as adopted by Long Beach, the \$30,000/25% fee may apply to all hotel rooms, not only higher cost rooms.

84. Ibid., 29.

85. Ibid.

\$30,000 figure by taking the rough average between “\$18,300 for the leased [hostel] facility” and “\$44,989 for the [hostel] facility constructed on purchased land.”⁸⁶ Second, the \$1.5 million is a lump sum that is not tied to a particular portion of rooms.

In the second exception, the CCC staff report provides an alternative mitigation method:

As an alternative to the payment of the mitigation charge, and as an alternative to providing lower cost overnight visitor accommodations within Sub-area 1a of PD-6 (Golden Shore Master Plan Site), the applicant may, subject to review and approval by the City Planning Commission and/or City Council, provide for the completion of a specific project (e.g., a youth hostel) that provides lower cost overnight visitor accommodations at a minimum ratio of one (1) bed for each new hotel room constructed on the Golden Shore Master Plan site that does not qualify as a “lower cost” visitor room. The applicant’s specific project shall provide a minimum of one hundred (100) beds - up to a maximum of two hundred (200) beds. The alternative project shall be located within the City of Long Beach coastal area, defined as the area within one-half mile of the inland boundary of the City’s coastal zone.⁸⁷

4.2.3. Establishing an In-Lieu Fee Account

The CCC staff report did not expand beyond the standard language described earlier in this report.⁸⁸

4.3. City of Solana Beach, LCP Land Use Plan (2012)

In 2012, the CCC reviewed the City of Solana Beach’s Local Coastal Plan Land Use Plan (“LCP LUP”).⁸⁹ The Land Use Plan is a component of the Local Coastal Plan that specifies location and type of land and water uses in the Local Coastal Plan area. An LCP LUP may also contain strategies and policies that represent local conditions, goals and interests.

4.3.1. Defining Local Low, Moderate, and High Cost Rates

In the Solana Beach case, the CCC delegated much of the lower cost hotel definition process to the City’s LCP LUP. In the Ventura case discussed above and the 2200 Lee Court case in San Diego discussed later, CCC staff performed these calculations. The CCC approved the following language for Policy 2.33 of Solana Beach’s LCP LUP:

86. South Coast Area Office, 5-13-0717, 1429 Hermosa, LLC, 33. This description is also provided in the CCC Staff Report for the Long Beach case at LOB-MAJ-1-10 (1-10) *City of Long Beach*, 36.

87. South Coast Area Office, LOB-MAJ-1-10 (1-10) *City of Long Beach*, 30.

88. *Ibid.*, 31.

89. California Coastal Commission, San Diego Area Office, *Revised Findings on City of Solana Beach LCP Land Use Plan for Commission Meeting of June 13-15, 2012*, by Sherilyn Sarb, Deborah Lee, and Diana Lilly, Th24a-6-2012 (San Diego, CA, 2012), 1.

The City shall maintain an accounting of the number of existing motel and hotel rooms and room rates. When referring to overnight accommodations, lower cost shall be defined by a certain percentage of the Statewide average room rate as calculated by the Smith Travel Research website (www.visitcalifornia.com) or other comparable or similar website or study such as www.Calif.AAA.com. A suitable methodology would base the percentage on market conditions in San Diego County for the months of July and August and include the average cost of motels/hotels within five (5) miles of the coast that charge less than the Statewide average. High cost would be room rates that are 20% higher than the Statewide average, and moderate cost room rates would be between high and low cost. The range of affordability of new and/or replacement hotel/motel development shall be determined as part of the coastal development permit process and monitored as part of the City's inventory of overnight accommodations.⁹⁰

This language presents two major variations from the standard approach modeled in the Ventura case.

First, concerning the geographic zone of local hotels for survey, the CCC used San Diego County as the political boundary and “five (5) miles of the coast” as distance from the coastline.⁹¹ The Ventura case also involved an update to city policy, but cast a narrower political boundary surveying hotels within the city jurisdiction not the entire county.⁹² Also, the Ventura case used the Coastal Zone within the Ventura for distance from the coastline, while the Solana Beach case specified Five-Miles from the coast. Aside from difference in land area, varying zones will produce local hotel inventories with different price points and other characteristics. Figure 4 show the Coastal Zone (blue line) and Five Mile Zone (green line) for both the City of Ventura (light blue) and the County of San Diego (pink).⁹³

90. Ibid., 11.

91. Ibid.

92. South Central Coast Area Office, *City of San Buenaventura SBV-MAJ-2-08*, 20.

93. For a discussion of the methodology and sources for the data collection and analysis that produced the maps Chapter 5 of this technical report.

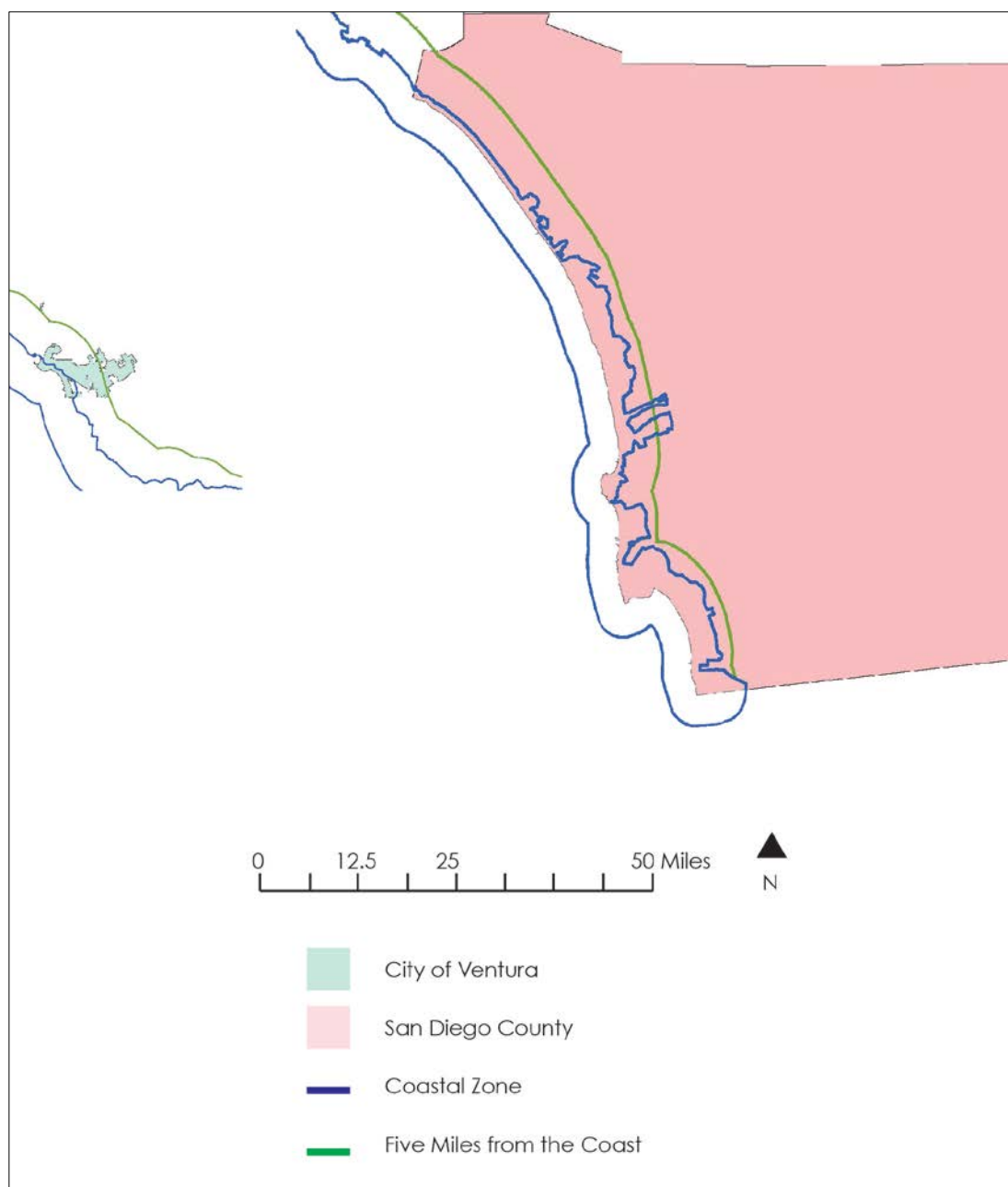


Figure 4. Coastal Zone and Five-Mile Zone for the City of Ventura and San Diego County

Second, the staff report for Solana Beach seems to not apply directly the low-cost formula to a sample of hotels in the determined relevant area. In this case, the CCC defines higher-cost hotel rooms as 20 percent above the State average, but that the “range of affordability of new and/or replacement hotel/motel development” will be determined on an on-going permit-by-permit basis.⁹⁴

94. San Diego Area Office, *Findings on Solana Beach LCP Land Use Plan*, 11.

4.3.2. Determining the Per Room In-Lieu Fee

For Solana Beach, the CCC applied the \$30,000/25% fee, but adjusted for inflation. The staff report states, “This payment (i.e. \$30,000 in 2007) is to be adjusted annually to account for inflation according to increases in the Consumer Price Index – U.S. City Average.”⁹⁵

4.3.3. Establishing an In-Lieu Fee Account

According to City staff, Solana Beach has yet to adopt a local implementation program or LCP, and therefore the City has not established its in-lieu fee account. However, the CCC approved the following language for Policy 5.8 in the City’s LCP LUP concerning the account:

The required monies [from the LCOVA in-lieu fees] shall be deposited into an interest-bearing account, to be established and managed by the City of Solana Beach. The purpose of the account shall be to establish lower cost overnight visitor accommodations within the City of Solana Beach as the first priority or elsewhere in North San Diego County coastal area as a second priority. The monies and accrued interest shall be used for the above-stated purpose, in consultation with the CCC Executive Director. Any development funded by this account will require review and approval by the Executive Director of the Coastal Commission and a coastal development permit.⁹⁶

4.4. City of San Diego, 2200 Lee Court Project (2014)

The 2200 Lee Court Project, proposed by McMillin-NTC, LLC, is located in San Diego’s Liberty Station. Unlike in the Ventura and Solana Beach case studies, which each involved updates to a city’s LCP, 2200 Lee Court is an individual development project pursued by a private developer. The site was formerly a US Naval Training Center under jurisdiction of the federal government, but was later transferred to City of San Diego in a public trust.⁹⁷ Despite certification of an LCP for the Naval Training Center area, the CCC retains permit authority of the project site as the land is held by public trust. The Project replaces an existing commercial parking lot with three hotels (650 rooms) and a separate 3,180 square foot restaurant building.⁹⁸ This case is of note because the CCC diverged from its standard cost formula and exercised considerable flexibility in its determination of the per-room in-lieu fee.

95. Ibid., 88-89.

96. Ibid., 51.

97. South Coast Area Office, 5-13-0717, 1429 Hermosa, LLC, 2.

98. Ibid.

4.4.1. Defining Local Low, Moderate, and High Cost Rates

Like the Solana Beach case, the CCC applied the following geographic zone for the local hotels to be surveyed: San Diego County⁹⁹ as the political boundary and “[h]otels in the coastal zone...within Five-Miles of the coast”¹⁰⁰ for distance from the coastline. To build the sample of hotels to be surveyed in the above zone, the CCC drew from 1-Diamond and 2-Diamond hotels listed on the AAA Auto Club Website. The list yielded 25 hotels, eight of which were in the “coastal zone.”¹⁰¹

In calculating the area’s cost categories, the CCC included two modifications to its standard cost formula:

- **Statewide ADR:** The CCC used the 2007 Statewide ADR (\$132.90) to calculate the Local ADR Quotient, but then applied that Local ADR Quotient to the 2013 Statewide ADR (\$128.93) to find the Cost Range.¹⁰²
- **Local High Cost Point:** The CCC rounded up the Cost Range for purposes of finding Local High Cost Point. The CCC explained that the purpose of this rounding was to provide a “conservative” result.¹⁰³

The CCC’s process in this case is detailed below in Figures 5 and 6:

2007 Statewide ADR = \$132.90
Local Low ADR = \$108.35
Local ADR Quotient = $\$108.35 / \$132.90 = 0.82$

2013 Statewide ADR = \$128.93
Cost Range for High = $(1 - 0.80 \text{ rounded down}) * \$128.93 = \$25.79$
Cost Range for Low = $(1 - 0.82) * \$128.93 = \23.21

Local High Cost Point = $\$128.93 + \$25.79 = \$154.72$
Local Low Cost Point = $\$128.93 - \$23.21 = \$105.72$

Local Low Cost Range < \$105.72
Local Moderate Cost Range $\geq \$105.72$ and $\leq \$154.72$
Local High Cost Range > \$154.72

Figure 5. Lee Court: Equations for Low, Moderate, and High Cost Ranges

99. San Diego Area Office, 6-13-0407 (McMillin-NTC, LLC), 31.

100. Ibid.

101. Ibid.

102. Ibid., 32-33.

103. Ibid., 32.

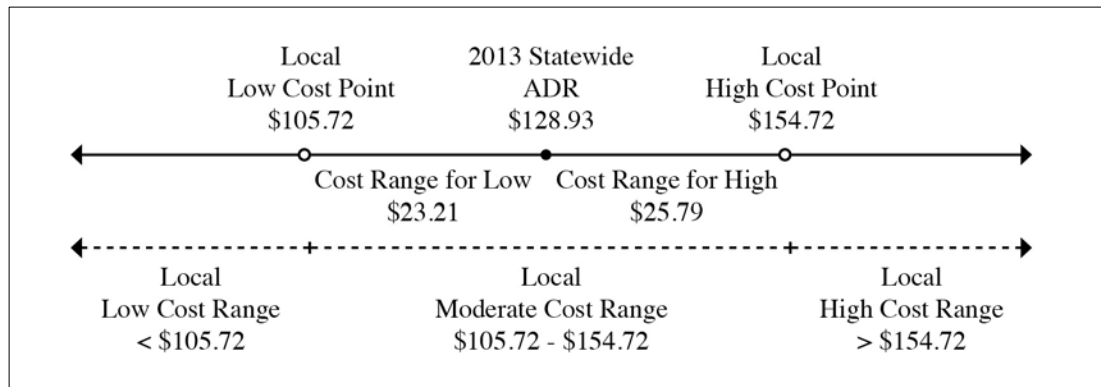


Figure 6. Lee Court: Diagram of Local Low, Moderate, and High Cost Ranges

4.4.2. Determining the Per Room In-Lieu Fee

As discussed earlier, the CCC typically applied a \$30,000 per room in-lieu fee for 25 percent of the total number of high-cost hotel rooms. However, in the case of 2200 Lee Court, the CCC applied the fee to only 12.5 percent of high-cost hotel rooms (compared to 25 percent of high cost rooms for Ventura and Solana Beach) for the Hotel 1 (the first of three hotels constructed).¹⁰⁴ At the time of the CCC's determination, Hotel 1 was slated to be 252-room all-suite hotel designed for operators such as the Embassy Suites or Spring Hill Suites. Hotel 1's projected rates were \$155 to \$190 per night, falling in the high-cost range. The CCC made its determination after the developer proposed the following arrangement for Hotel 1:

- All rooms would entail free Internet service, breakfast, and cocktail reception for guests, and
- 35 percent of the rooms would be outfitted to accommodate up to six people per room at the standard rate.¹⁰⁵

The CCC found that the free amenities alone were not sufficient for reclassifying the hotel rooms as moderately priced, since many hotels in the San Diego area provide such amenities as part of their daily rates.¹⁰⁶ However, the package of free amenities plus the agreement to configure 35 percent of the rooms for up to six people would increase overall affordability.¹⁰⁷

The adjusted in-lieu fee requirement cuts the developer's LCOVA in-lieu fee payment by nearly half. Applying the CCC's typical \$30,000/25% fee for 252 high-cost hotel rooms, the developer would pay \$1,890,000 $((0.25 * 252) * \$30,000 = \$1,890,000)$. Applying the adjusted \$30,000/12.5% fee, the CCC calculated the developer's payment at \$960,000. Because, 12.5

104. Ibid., 33.

105. Ibid.

106. Ibid., 34.

107. Ibid.

percent of 252 rooms totals 31.5 rooms, the CCC rounded the up to 32 to account for a whole number of rooms ($32 * \$30,000 = \$960,000$).¹⁰⁸ Rounding up to 32 rooms from 31.5 rooms adds \$15,000 to the total payment ($31.5 * \$30,000 = \$945,000$).

4.4.3. Establishing an In-Lieu Fee Account

In the staff report for this case, the CCC did not directly call for the creation of a mitigation fee account.

108. Ibid., 33.

Chapter 5. Hotel Inventories

As mentioned in Chapter 1, the CCC revisited its approach to LCOVA mitigation following its 2006 workshop study on the issue that showed less than 10 percent of hotels in California's nine most popular counties were considered lower cost.¹⁰⁹ Detailed in Chapter 3, the CCC's revamped approach to the LCOVA in-lieu fee relies on hotel ADR data in two key aspects of the three-prong approach:

- The CCC uses the STR-derived Statewide ADR trend reports as a benchmark for hotel costs along the California coast.
- The CCC builds local hotel inventories and applies a formula to determine the room rate at which the low-cost accommodation in-lieu fee will be triggered.

This chapter examine daily rate data for select hotel inventories to generate metrics to quantitatively evaluate the application of LCOVA mitigation, specifically the \$30,000/25% fee in Long Beach.

Following a discussion of methodology, three sets of analysis are presented in this chapter:

1. **California Statewide ADR:** The appropriate Statewide ADR determined by economic and market contexts and validity of calculation.
2. **California Coastal Premium:** The difference in cost between coastal hotels and all hotels statewide is examined for additional context for the CCC's approach to the LCOVA in-lieu fee.
3. **CCC Local Costs:** Using the Statewide ADR and the California coastal premium as context, the applicability of the CCC approach to the City of Long Beach and its region (Los Angeles County and Orange County) is examined.

The inventories (11 total) for these three sets of analysis are shown in Table 3.¹¹⁰

109. South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 33.

110. See Appendices A and B for complete hotel inventories and maps for the California coastal premium analysis and the CCC low cost analysis, respectively.

Table 3. Data Analysis Inventories

Political	Distance from the Coast
California Statewide ADR	
California	Statewide
California Coastal Premium	
California Coastal Counties	Coastal Zone
California Coastal Counties	Coastal Zone
California Coastal Counties	Five-Mile Zone
CCC Local Costs	
City of Long Beach	Coastal Zone
City of Long Beach	Five-Mile Zone
Los Angeles County	Coastal Zone
Los Angeles County	Five-Mile Zone
Orange County	Coastal Zone
Orange County	Five-Mile Zone
Los Angeles County and Orange County	Coastal Zone
Los Angeles County and Orange County	Five-Mile Zone

5.1. Methodology

The purpose of the data analysis in this section is to shed light on the hotel rate conditions in Long Beach in context of LCOVA mitigation. Therefore, every effort was made to follow the CCC's procedures as outlined in its staff reports. Instances where deviation from CCC procedure was unavoidable are documented. The data studied in this chapter is derived directly from STR trend reports – the service used by the CCC to obtain the Statewide ADR data-point. The methodology included two major elements: data collection and data analysis.

5.1.1. Data Collection

The data collection process included two components:

- Data collection for Statewide ADR inventory,
- Data collection for the California Coastal Premium and CCC Local Cost inventories.

The processes for both components are explained below.

5.1.1.1. Data Collection for Statewide ADR

The data for the Statewide ADR analysis was derived from two sources:

- A CCC staff report showing the 2007 and 2013 ADR figures discussed in Chapter 3,¹¹¹ and
- An STR trend report showing the July and August 2015 ADR for California statewide.

5.1.1.2. Data Collection for the Coastal Premium and CCC Local Cost Inventories

The data collection process discussed below explains how lists of hotels were constructed to request and obtain STR trend reports.

1. Obtain STR hotel participation lists for the 15 California coastal counties for inventory;
2. Obtain global positioning system (“GPS”) and use geographic information systems (“GIS”) analysis to determine which hotels are located in the Coastal Zone or the Five-Mile Zone; then
3. Obtain the AAA ratings, or lack thereof, for each hotel;
4. Compile lists to request STR trend reports for inventories.

5.1.1.2.1. STR Participation Lists

STR participation lists (lists of hotels participating in the company’s trend reports) were obtained for the 15 California coastal counties. The lists provide the following information for each hotel:

- Business name, city, and zip code;
- Months and years of participation in trend survey; and
- Class rating by STR (economy, midscale, upper midscale, upscale, upper upscale, and luxury).

In aggregate, the lists included 3,671 hotels.¹¹²

111. San Diego Area Office, 6-13-0407 (McMillin-NTC, LLC), 29-30.

112. The STR participation lists first obtained in two phases: First, on August 26, 2014, STR participation lists were created for the 15 California coastal counties, which included 3,642 unique hotels in the aggregate. Second, on September 24, 2015, an STR participation list was created of new California hotels participating since January 1, 2014, which included 29 new unique hotels in the California coastal counties. The 29 new unique hotels were added to the initial California coastal county participation lists, which increased the total unique hotels to 3,671.

5.1.1.2.2. Mapping Hotels in the Coastal Zone or Five-Mile Zone

As explained in Chapter 3, the CCC has used two different parameters for measuring distance from the coastline—the California Coastal Zone and the Five-Mile Zone. GIS was used to map hotels’ location in either zone. This process included three steps:

1. Obtain GPS coordinates and street address for each hotel on the filtered STR participation lists.¹¹³
2. Build GIS layers and buffers for the City of Long Beach,¹¹⁴ California coastal counties (from north to south: Del Norte,¹¹⁵ Humboldt,¹¹⁶ Mendocino,¹¹⁷ Sonoma,¹¹⁸ Marin,¹¹⁹ San Francisco,¹²⁰ San Mateo,¹²¹ Santa Cruz,¹²² Monterey,¹²³

113. For the 2014 phase, the hotels’ respective GPS coordinates and street addresses were obtained from two sources: An Oddity Software hotel database and Google Maps.

114. Los Angeles County Enterprise GIS, “City of Long Beach,” last modified 2013, <http://egis3.lacounty.gov/dataportal/2014/06/18/city-boundaries/>

115. County of Del Norte, Department of Information Technology, “Del Norte County,” last modified 2014, <http://www.co.del-norte.ca.us/departments/information-technology/geographic-information-services-gis>

116. Humboldt County, Business & Building Services, “Humboldt County,” last modified 2004, <http://humboldtgov.org/276/GIS-Data-Download>

117. Marine Pollution Studies Laboratory-Moss Landing Marine Laboratories, “Mendocino County,” last modified 2007, <http://swamp.mpsl.mlml.calstate.edu/resources-and-downloads/database-management-systems/swamp-25-database/templates-25/gis-shapefile-layers>

118. Sonoma County, Permit and Resource Management Department, “Sonoma County,” last modified 2010, http://www.sonoma-county.org/prmd/gisdata/data_download.htm

119. MarinMap, “Marin County,” last modified 2014, <http://www.marinmap.org/DNN/Data/GISDataDownload.aspx>

120. City and County of San Francisco, SF OpenData, “San Francisco County,” last modified 2014, <https://data.sfgov.org/Geographic-Locations-and-Boundaries/Bay-Area-Counties-Zipped-Shapefile-Format-/cntd-ggej>

121. Ibid.

122. Ibid.

123. Monterey County, “Monterey County,” last modified 2014, http://montereycountyopendata.montereyco.opendata.arcgis.com/datasets?q=county+boundary&sort_by=relevance

San Luis Obispo,¹²⁴ Santa Barbara,¹²⁵ Ventura,¹²⁶ Los Angeles,¹²⁷ Orange,¹²⁸ and San Diego¹²⁹), Coastal Zone,¹³⁰ and Five-Mile Zone.¹³¹

3. Based on the obtained GPS coordinates, map the hotels in the coastal counties that fall in the Coastal Zone or the Five-Mile Zone.¹³²

Of the 3,671 hotels on the participation lists, 673 were located within the Coastal Zone or the Five-Mile Zone.

5.1.1.2.3. AAA Ratings

As explained in Chapter 3, the CCC builds inventories of local hotels for calculating the in-lieu fee trigger. For the local inventory, the CCC only considers AAA-rated hotels as a quality control measure. AAA-published guidebooks for Northern and Southern California¹³³

124. California Polytechnic State University, "San Luis Obispo County," last modified 2013, <http://lib.calpoly.edu/gis/browse.jsp?by=c&c=2>

125. County of Santa Barbara, "Santa Barbara County," last modified 2013, <http://www.countyofsb.org/gis/default.aspx?id=28>

126. County of Ventura, "Ventura County," last modified 2014, <http://www.ventura.org/gis-mapping/gis-data-downloads-political>

127. Los Angeles County Enterprise GIS, "Los Angeles County," last modified 2013, <http://egis3.lacounty.gov/dataportal/2014/06/18/city-boundaries/>

128. Orange County, "Orange County," last modified 2013, <http://ocdata.giscloud.com/>

129. SanGIS, "San Diego County," last modified 2014, <http://www.sangis.org/>

130. California Department of Fish and Wildlife, "California Coastline," last modified 2004, <http://www.dfg.ca.gov/marine/gis/downloads.asp>; Los Angeles County Enterprise GIS, "California Coastal Commission Zone Boundary," last modified 2009, <http://egis3.lacounty.gov/dataportal/2011/06/06/california-coastal-commission-zone-boundaries/>

131. The inland Coastal Zone boundary was retrieved from the Los Angeles County GIS Data Portal, while the western boundary was created from a three-mile buffer from the California coastline. These boundaries were layered on top of the data for the California coastal counties and the City of Long Beach. A five-mile buffer east of the coastline was layered on top of the county and city data in order to compare the Coastal Zone boundary with the five-mile boundary.

132. For the 29 hotels added from the September 24, 2015 STR participation list, GPS coordinates and street addresses were obtained from Google Maps. The hotels' distance from the coast was obtained using the measuring tool on Google Earth. The hotel's location relative to the Coastal Zone was obtained by applying Coastal Zone boundary to Google Earth (Caltrans, "Coastal Zone," accessed September 1, 2015, <https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&cad=rja&uact=8&ved=0CB0QFjAAahUKEwjQyJE25rIAhUTWYgKHeX4DgE&url=http%3A%2F%2Fsvctenvims.dot.ca.gov%2Fwqpt%2Fcontent%2Fkml%2FCoastalZone.kmz&usg=AFQjCNGGdVX45holns2Uu5TiuYtipeU0ag&bvm=bv.103388427,d.cGU>). Of the 29 hotels added, 14 were located in the Coastal Zone or the Five-Mile Zone.

133. American Automobile Association, *TourBook Guide: Northern California*, 2014 ed. (Heathrow, FL: AAA Publishing, 2013); American Automobile Association, *TourBook Guide: Southern California*, 2014 ed. (Heathrow, FL: AAA Publishing, 2013).

were used to obtain the AAA rating (one, two, three, four, or five diamonds), or lack thereof, for each hotel in the filtered STR participation lists.¹³⁴

Of the 673 hotels located in the Coastal Zone or the Five-Mile Zone, 471 were AAA-rated.¹³⁵

5.1.1.2.4. Compiling Lists for STR Trend Reports

Shown above, the first three steps generated a list of 471 hotels that participate STR surveys, are located in the Coastal Zone or Five-Mile Zone, and are AAA-rated. The data analysis inventories are composed from this list of 471 hotels. The hotel counts for each inventory are shown in Table 4.

Table 4. Inventory Hotel Counts

Area	Coastal Zone			Out Coastal Zone, In Five-mile Zone			Five-mile Zone (Total)		
	AAA	Non-AAA	Total	AAA	Non-AAA	Total	AAA	Non-AAA	Total
For California Coastal Premium									
California Coastal Counties	228	87	315	243	115	358	471	202	673
For CCC Local Cost									
City of Long Beach	5	1	6	12	9	21	17	10	27
Los Angeles County	27	16	43	74	25	99	101	41	142
Orange County	26	8	34	16	6	22	42	14	56
Los Angeles County and Orange County	53	24	77	90	31	121	143	55	198

Using the data collected in the steps above, eight lists for STR trend reports provide the ADR for July and August 2015 for each inventory. Explained below in this chapter, not all eight trend report request lists, shown in Table 5, map exactly with the studied inventories.

134. For the 14 hotels from the September 24, 2015 STR participation list located in the Coastal Zone or Five-Mile Zone, AAA ratings, or lack thereof, were obtained through the AAA website (Automobile Club of Southern California (AAA), "Advanced Hotel Search," accessed September 30, 2015, <http://secure.rezserver.com/hotels/home/?refid=5733>). Of the 14 hotels, seven were AAA rated. See Appendix D for a listing of the seven hotels.

135. See Appendix C for counts and percentages pertaining to AAA ratings and the hotel inventories.

Table 5. STR Trend Report Request Lists

List No.	Geographic Zone		Hotel Count
	Political	Distance from the Coast	
For California Coastal Premium			
1	CA Coastal Counties	Coastal Zone	228
2	CA Coastal Counties	Five-Mile Zone	471
For CCC Inventory Costs			
3	City of Long Beach	Outside the Coastal Zone, inside the Five-Mile Zone	12
4	City of Long Beach	Five-Mile Zone	17
5	Los Angeles County	Coastal Zone	27
6	Los Angeles County	Five-Mile Zone	101
7	Orange County	Coastal Zone	26
8	Orange County	Five-Mile Zone	42

5.1.2. Data Analysis

The three sets of data analysis—the California Statewide ADR, California coastal premium, and CCC local costs—required different datasets and, at times, variations from the above collected data.

5.1.2.1. Data Analysis for the Statewide ADR Inventory

Analysis to determine the appropriate Statewide ADR includes comparative review of each statewide ADR figures’ economic and market contexts and consistency with stated CCC practices.

5.1.2.2. Data Analysis for the California Coastal Premium Inventories

The coastal premium is calculated by taking the difference of the coastal counties ADR for the Coastal Zone and Five-Mile Zone, respectively, from the Statewide ADR. For perspective, the premium was placed in the context of data on household travel expenditures from the United States Department of Labor’s Bureau of Labor Statistics.¹³⁶

5.1.2.3. Data Analysis for the CCC Local Cost Inventories

There are two parts to the analysis for each CCC local cost inventory:

- Examining the local ADR, and
- Applying the CCC’s formula for setting the in-lieu fee trigger.

136. Bureau of Labor Statistics, United States Department of Labor, “Travel Expenditures, 2005–2013: Domestic and International Patterns in Recession and Recovery,” *Monthly Labor Review* (March 2015).

5.1.2.3.1. Local ADR

To examine the local ADR for each inventory, the average ADR from July and August 2015 were obtained from each list's respective STR trend report, with three exceptions:

- **City of Long Beach – Coastal Zone:** An STR trend report could not be produced for the City of Long Beach – Coastal Zone. This inventory exceeded STR's limit of 40 percent of one brand per list (Hyatt constituted 43 percent of ownership). Instead, two lists were used to derive data for this inventory: City of Long Beach – Outside Coastal Zone, Inside Five-Mile Zone and City of Long Beach – Five-Mile Zone. The 17 hotels on the Five-Mile Zone list includes all five hotels on the Coastal Zone list and all 12 hotels on the Outside Coastal Zone, Inside Five-Mile list. The results from the Outside Coastal Zone, Inside Five-Mile were used to disaggregate the Coastal Zone list results from the Five-Mile list.
- **Los Angeles County and Orange County – Coastal Zone:** An STR trend report was not requested for this inventory. Instead, the STR trend reports for Los Angeles County – Coastal Zone and Orange County – Coastal Zone were aggregated by the following process: For both respective inventories, the ADR was multiplied by the number of hotels in the inventory. The resulting totals then summed and divided by the total number of hotels in the two inventories together.
- **Los Angeles County and Orange County – Five-Mile Zone:** An STR trend report was not requested for this inventory. Instead, the STR trend reports for Los Angeles County – Five-Mile Zone and Orange County – Five-Mile Zone were aggregated using the same process described above.

5.1.2.3.2. CCC Formula for In-Lieu Fee Trigger

As discussed in Chapter 3, the CCC's formula to define the low, moderate, and high-cost ranges for hotel inventories relies on two pieces of ADR data: The Statewide ADR and the average ADR for local hotels falling below the Statewide ADR (i.e., the Local Low ADR). To apply the CCC formula to the above hotel inventories, this report will use the Local Low ADRs derived from the process explained below.

Because the STR trend reports do not provide disaggregated results for each hotel in the inventory, the Local Low ADR for each inventory was obtained through a five-step process:

1. Consistent with practices performed by the CCC, the inventories were filtered to show only one or two-diamond AAA-rated hotels.¹³⁷

137. Ibid., 30-31

2. A yearly average was surmised for each hotel by taking the average of the low and high from the rate ranges provided in AAA's 2105 guide for Southern California.¹³⁸
3. Using STR trend report data for each hotel inventory,¹³⁹ the July and August 2014 ADR was divided by the 12-month 2014 ADR to produce a July and August 2014 multiplier.¹⁴⁰ The 2014 figures were used because the complete 12-month 2015 ADR figures are not yet available.¹⁴¹
4. This multiplier was applied to the surmised averages each hotel within the respective inventory to obtain the estimated average July and August 2015 ADR for each hotel.
5. The Local Low ADR was calculated by averaging the estimated average July and August 2015 ADR for each hotel below the Statewide ADR.

With the Statewide ADR and the Local Low ADR, the CCC's formula, detailed in Chapter 3, was applied for each inventory.

5.2. California Statewide ADR

As explained in Chapter 3, the CCC uses the California Statewide ADR as a baseline to compare the affordability of local hotel inventories. Therefore, the Statewide ADR is a foundational element of the CCC's determination of higher cost hotel rates. Also explained in Chapter 3, the CCC produced a July and August 2007 Statewide ADR of \$132.90, which, as a quality control measure, considered only AAA-rated hotels.¹⁴² The CCC explained that the 2007 figure remained valid overtime, because the Statewide ADR experienced little fluctuation from 2007 to 2013 (\$128.92), but it is unclear whether or not the 2013 figure was exclusive to AAA-rated hotels.¹⁴³ A 2015 STR trend report showed the July and August 2015 Statewide ADR to be \$163.99, not exclusive to AAA-rated hotels.

A review of economic and market conditions and ADR trends suggest that 2007 or 2013 figures are no longer relevant standards of hotel affordability. Although the 2015 figure is not exclusive to AAA-rated hotels, this figure is the most appropriate to serve as the Statewide ADR for purposes of an affordability analysis.

138. American Automobile Association, *TourBook Guide: Southern California*, 2015 ed. (Heathrow, FL: AAA Publishing, 2014).

139. Explained above in this chapter, STR trend reports were not produced for Log Beach – Coastal Zone or the combined Los Angeles County and Orange County inventories were not requested. Therefore the multiplier for these inventories was derived California coastal counties inventories.

140. See Appendix E for the data and calculations generating the July and August 2014 multipliers.

141. As of the date of this technical report, STR trend report data was available for January 2009 through September 2015.

142. San Diego Area Office, 6-13-0407 (*McMillin-NTC, LLC*), 30.

143. *Ibid.*, 29-30

5.2.1. Economic and Market Conditions

Historically, real estate markets rise and fall over time across geography and property sectors (retail, industrial, hotel, residential, etc.). The real estate market is understood to be cyclical, meaning it has certain characteristics and events that will repeat over given periods of time.¹⁴⁴ Cycles among property types and locations do not rise and fall in parallel. While the office sector may be strong at one point in time, a different property sector (such as retail, industrial, hotel, residential, etc.) may be weak at that same point in time. Further, turning points in the real estate cycle—transitioning from prosperity, to recession, to depression, to recovery, and back to prosperity—can be caused and accelerated by a series of outside factors such as natural disasters, shifts in national or local economic policy, and changes in demand for investment and consumer goods.¹⁴⁵

Consider the hotel market's response to the Great Recession. The Great Recession occurred in the United States from December 2007 through June 2009.¹⁴⁶ During this period, the national unemployment rate rose from 5.0 percent to 9.5 percent.¹⁴⁷ In February 2009, employers laid off 362,392 workers over 3,059 mass layoff actions.¹⁴⁸ Although the recession technically ended in June 2009, the hotel market's recovery took hold in 2014. Shown in Figure 7 below, while the national gross domestic product ("GDP") reached positive growth in 2010 (2.7 percent) the national ADR did not approach positive growth until 2011 (3.8 percent).¹⁴⁹ ADR grown began to climb again in 2014 (4.5 percent).¹⁵⁰

144. Richard Grover and Christine Grover, "Property Cycles," *Journal of Property Investment & Finance* 31, no. 5 (2013): 502-503.

145. Ibid.: 506.

146. Bureau of Labor Statistics, United States Department of Labor, *BLS Spotlight on Statistics: The Recession of 2007-2009*, February 2012, 1.

147. Ibid., 2.

148. Ibid., 14.

149. PwC, *Hospitality Directions US: Our Updated Lodging Outlook*, (August 2015), 3. (2015 data through August 31.)

150. Ibid.

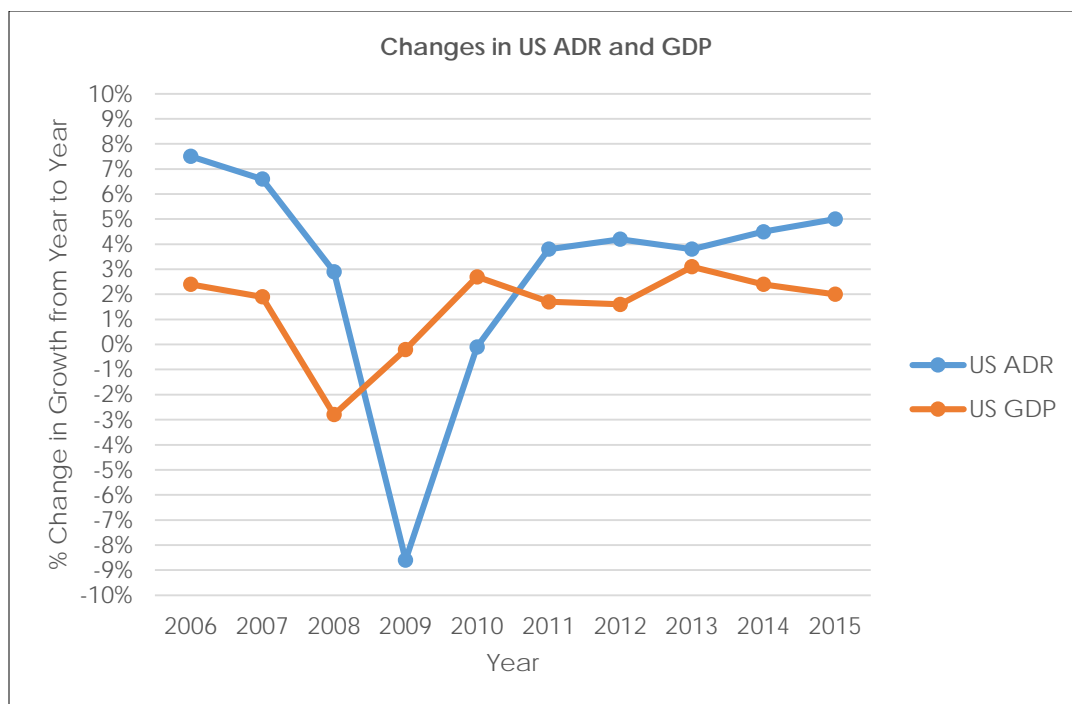


Figure 7. Percentage Changes in Growth in US ADR Compared to GDP (2006 to 2015)
Source: PwC, August 2015, 3. (2015 data through August 31).

The CCC's 2007 and 2013 California July and August ADR figures represent two past market cycles and do not reflect current hotel market trends. Explained further below, the STR trend report's 2015 California July and August ADR figure is more indicative of current conditions.

5.2.2. California ADR Trends

California Statewide ADR trends are consistent with the economic and market conditions described above. Table 6 shows California Statewide July and August ADR figures from 2009 to 2015 (not exclusive to AAA-rated hotels).

Table 6. California Statewide July and August ADR (2009 to 2015)

Year	July and August ADR	% Change by Year	% Change from 2015
2009	\$113.54		44.44%
2010	\$116.71	2.79%	40.51%
2011	\$124.23	6.44%	32.01%
2012	\$132.21	6.42%	24.04%
2013	\$141.27	6.86%	16.08%
2014	\$153.08	8.36%	7.12%
2015	\$163.99	7.12%	

Emerging from the Great Recession, the Statewide July and August ADR increased 2.79 percent from 2009 to 2010 (\$113.54 to \$116.71), but then more than doubled to 6.44 percent from 2010 to 2011 (\$116.71 to \$124.23). July and August ADR growth remained steady in 2011, 2012, and 2013 (6.44 percent, 6.42 percent, and 6.86 percent). In 2014, July and August ADR growth jumped to 8.36 percent. The July and August 2015 ADR (\$163.99) is 16.08 percent greater than in 2013 (\$141.27) and 44.44 percent greater than in 2009 (\$113.54).

Along with the economic and market conditions discussed above, these trends call into question the present-day validity of the CCC's 2007 and 2013 July and August ADR figures. The CCC's 2007 ADR figure (\$132.90) was generated even before the Great Recession, and is likely too distant from the recent ADR trends to properly account for current conditions. The CCC's 2013 ADR figure (\$128.92) was generated before the jump in ADR growth of 2014. Also, the CCC's 2013 ADR figure (\$128.92) is considerably less than the STR produced ADR for the same period (\$141.27).¹⁵¹ For reasons explained below, if the CCC's 2013 ADR figure was exclusive to AAA-rated hotels, then it would likely be greater than the STR's 2013 figure that was not exclusive to AAA-rated hotels.

Aside from being the most up-to-date, the STR trend report's July and August 2015 ADR figure (\$163.99) best captures the impact of the recent changes economic and market conditions on the Statewide ADR.

5.2.3. Exclusivity of AAA-rated Hotels

As explained in Chapter 3, the CCC limits hotel affordability inventories to AAA-rated hotels as a measure of quality control. Although the STR trend report's July and August ADR figure is not exclusive to AAA-rated hotels, it still holds up as an appropriate measure of statewide affordability conditions.

Because AAA-rated hotels must meet particular criteria of quality, rates at AAA-rated hotels are likely higher than rates at non-AAA-rated hotels. Accordingly, and hotel inventory defined by geographic area is assumed to yield a higher ADR if exclusive to AAA-rated hotels than if inclusive of AAA-rated and non-rated-AAA hotels. Following this assumption, the 2015 ADR figure (\$163.99) would likely be higher if exclusive to AAA-rated hotels.

Because the CCC's in-lieu fee formula measures the local inventory ADR against the Statewide ADR to determine affordability and trigger in-lieu fees, using a lower Statewide ADR is a more conservative approach. If the local inventory is exclusive to AAA-rated hotels, the 2015 ADR figure may include the local area's lower cost non-AAA-rated hotels not counted towards the local area's affordability. Accordingly, when applied to the CCC's in-lieu fee formula, the 2015 ADR figure will likely calculate results that understate and not overstate the local area's affordability.

151. The CCC's July and August 2013 ADR figure (\$128.92) is closer to, but still under, the STR trend report's 12-month 2013 ADR figure (\$130.67).

5.3. California Coastal Premium

As mentioned above, a 2006 CCC workshop study on affordable coastal accommodations showed that less than 10 percent of hotels in the state's nine most popular counties were considered low-cost.¹⁵² The data below is intended to further understand and elucidate the affordability issue and the CCC's approach. As would be expected, hotels along the coast are generally more expensive than hotels statewide. However, this difference in cost—the California coastal premium—does not seem to be significant or cost-prohibitive when considering its share of overall travel-related expenditures. Table 8 shows coastal premiums for the Coastal Zone and the Five-Mile Zone.¹⁵³

Table 7. California Coastal Premiums for Coastal Zone and Five-Mile Zone

Political	Distance From Coast	Hotel Count	July and August 2015 ADR		Local Premium
			Coastal	Statewide	
California Coastal Counties	Coastal Zone	228	\$265.04	\$163.99	\$101.04
California Coastal Counties	Five-Mile Zone	471	\$218.73		\$54.74

The premium for hotels in the Coastal Zone is \$101.04 while the premium for hotels in the Five-Mile Zone is \$54.74. Both figures represent the greater market demand for coastal accommodations. Compared to the Statewide ADR, these premiums seem expensive, but become far less significant when compared to the overall travel budget. In 2014, the average per-person cost of a vacation was \$1,145.¹⁵⁴ Based this figure, Table 7 breaks down the components, and their respective shares, of travel-related expenditures.¹⁵⁵

Table 8. Average Household Travel-related by Share (2013) from Total Cost (2014)

Category	Share	Total
Transportation	38.7%	\$443.12
Food/alcohol	26.6%	\$304.57
Lodging	26.0%	\$297.70
Entertainment	8.8%	\$100.76
Total	100.0%	\$1,145.00

Source: Bureau of Labor Statistics, United States Department of Labor, March 2015 (2013 shares); Phillips Erb, July 7, 2015 (2014 total cost). The 2014 total cost was divided by the 2013 shares by category.

152. South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 33.

153. See Appendix D for more detailed data from the STR trend report, including findings from 2009 to 2015 for each inventory.

154. Kelly Phillips Erb, "The Real Cost Of Summer Vacation: Don't Get Buried In Taxes," *Forbes*, July 7, 2014, accessed October 27, 2015, <http://www.forbes.com/sites/kellyphillipserb/2014/07/07/the-real-cost-of-summer-vacation-dont-get-buried-in-taxes/>

155. Ibid.

Because lodging accounts approximately one quarter (26.6%) of the travel-related expenditures, it is unlikely that the California coastal premium would be a regularly prohibitive factor for household trips to the coast. Transportation costs (38.7%) likely play a far greater role in vacation planning. Studies show decisions concerning departure date, travel budget, length of trip, and travel mode are mostly made “before the purchase,” while decisions concerning accommodations are mostly made “at the time purchase” or later.¹⁵⁶

5.4. CCC Local Costs

The STR trend reports for the City of Long Beach, Los Angeles County, and Orange County show that Long Beach offers affordable hotels relative its region and the Statewide ADR. Further the Long Beach – Five-Mile Zone inventory’s July and August 2015 ADR (\$155.05) is \$8.94 below the July and August 2015 Statewide ADR (\$163.99). Further, application of the CCC’s in-lieu fee formula to the inventories exposes problems in the formula’s design.

5.4.1. Local ADR

Relative to its region, the Statewide ADR, and the coastal premiums identified earlier, Long Beach offers reasonably affordable accommodations along the California Coast. In fact, the Long Beach – Five-Mile Zone ADR is lower than the statewide average, suggesting there may be limited to no basis for the CCC to impose in-lieu fee penalties City of Long Beach projects. Tables 10 and 11 shows the ADR findings for local inventories.¹⁵⁷

Table 9. Coastal Zone Local Inventory ADR Findings (2015)

Political	Distance from the Coast	Hotel Count	July and August 2015 ADR		Local Premium (Local – Statewide)
			Local	Statewide	
City of Long Beach	Coastal Zone	5	\$191.54	\$163.99	\$27.55
Los Angeles County	Coastal Zone	27	\$314.29		\$150.29
Orange County	Coastal Zone	26	\$399.16		\$235.17
Los Angeles County and Orange County	Coastal Zone	53	\$355.92		\$191.93

156. Astrid Kemperman and Anna Grigolon, “Facet-based Analysis of Vacation Planning Processes: A Binary Mixed Logit Panel Model,” *Journal of Travel Research* 52, no. 2 (2013): 193.

157. See Appendix D for additional data from the STR trend reports.

Table 10. Five-Mile Zone Local Inventory ADR Findings (2015)

Political	Distance from the Coast	Hotel Count	July and August 2015 ADR		Local Premium (Local – Statewide)
			Local	Statewide	
City of Long Beach	Five-Mile Zone	17	\$155.05	\$163.99	-\$8.94
Los Angeles County	Five-Mile Zone	101	\$197.42		\$33.42
Orange County	Five-Mile Zone	42	\$341.85		\$177.86
Los Angeles County and Orange County	Five-Mile Zone	143	\$239.84		\$77.85

The findings above show that Long Beach offers the most affordable rates (\$191.54 for the Coastal Zone and \$155.05 for the Five-Mile Zone) when compared to Los Angeles County and Orange County. The Five-Mile Zone for Long Beach produced an ADR that is \$8.94 below the Statewide ADR. This is a significant finding, particularly in the context of the California coastal premiums identified in the section above. Tables 12 and 13 below shows the local inventory premiums (Local ADR – Statewide ADR) relative to the statewide Coastal premiums.

Table 11. Coastal Zone Local Premiums Relative to Coastal Zone Premium (2015)

Political	Distance from the Coast	Hotel Count	Local Premium	Coastal Zone Premium	Ratio (Local / Coastal Zone)
City of Long Beach	Coastal Zone	5	\$27.55	\$101.04	0.27
Los Angeles County	Coastal Zone	27	\$150.29		1.49
Orange County	Coastal Zone	26	\$235.17		2.33
Los Angeles County and Orange County	Coastal Zone	53	\$191.93		1.90

Table 12. Five-Mile Zone Local Premiums Relative to Five-Mile Zone Premium (2015)

Political	Distance from the Coast	Hotel Count	Local Premium	Five-Mile Zone Premium	Ratio (Local / Five-Mile Zone)
City of Long Beach	Five-Mile Zone	17	-\$8.94	\$54.74	-0.16
Los Angeles County	Five-Mile Zone	101	\$33.42		0.61
Orange County	Five-Mile Zone	42	\$177.86		3.25
Los Angeles County and Orange County	Five-Mile Zone	143	\$75.85		1.39

The Long Beach's ratio falls well within the coastal premiums for both zones (0.27 for the Coastal Zone and -0.16 for the Five-Mile Zone). Within the Region, Orange County produced the most drastic difference between the local premiums and the coastal premiums (2.33 for the Coastal Zone and 3.25 for the Five-Mile Zone). Long Beach's home county, Los Angeles County's ratio for the Coastal Zone (1.49) is well below Orange County's, and its ratio for the Five-Mile Zone (0.61) is even further below Orange County's.

The above findings are not isolated to 2015. Since 2009, the July and August ADR for Long Beach – Coastal Zone has remained the most affordable of the inventories studied, while Long Beach – Five-Mile Zone has remained below the Statewide ADR. Figures 7 and 8 show the

Coastal Zone and Five-Mile Zone inventories, respectively, compared to the Statewide ADR from 2009 to 2015.

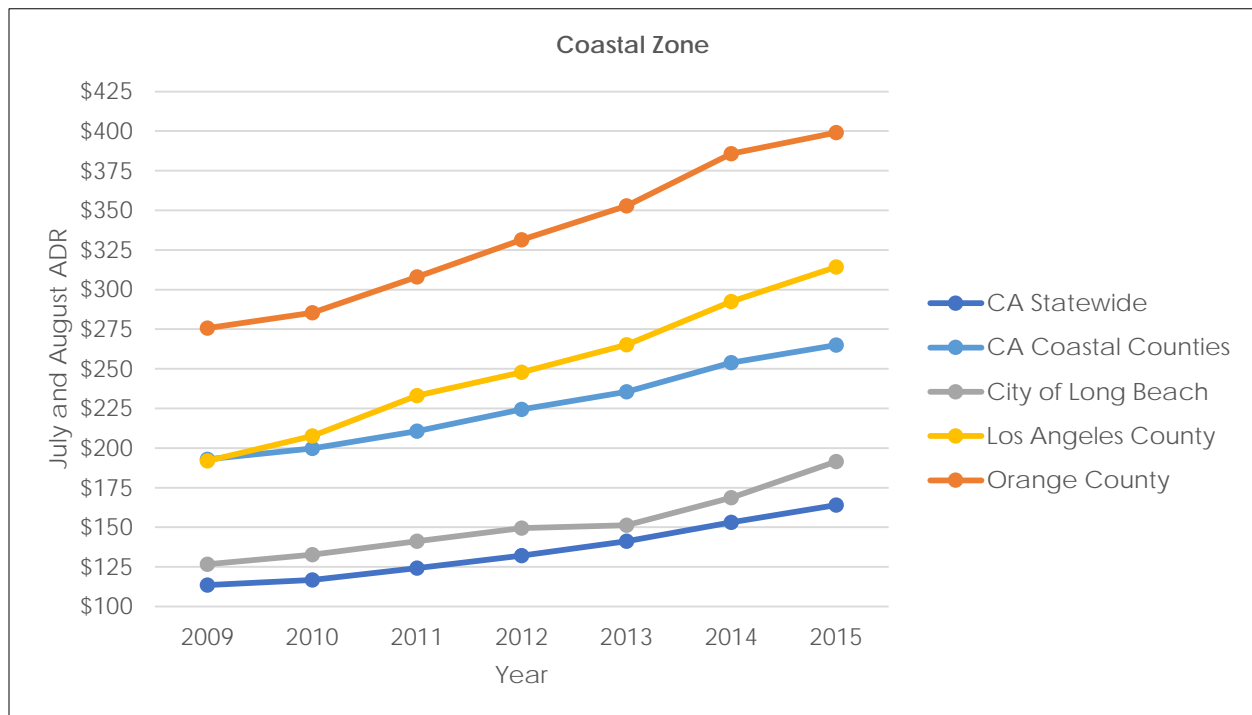


Figure 8. Coastal Zone Inventories Compared to the Statewide ADR (2009 to 2015)

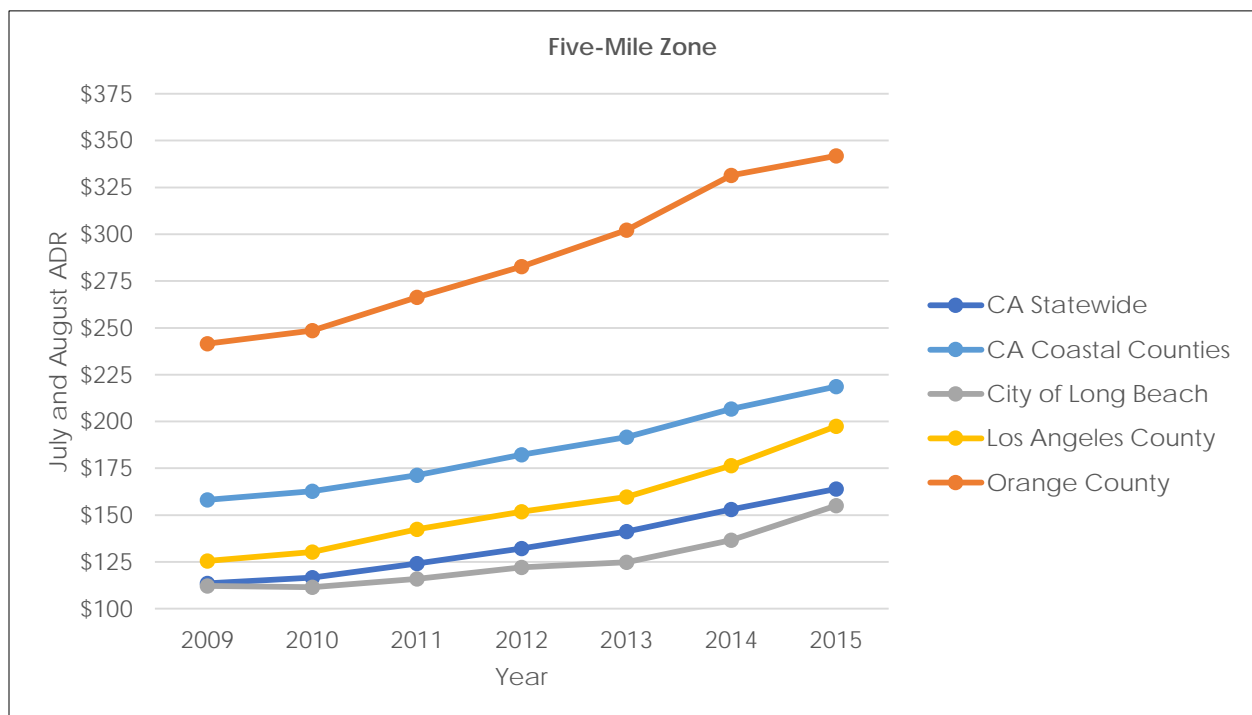


Figure 9. Five-Mile Zone Inventories Compared to the Statewide ADR (2009 to 2015)

5.4.2. CCC In-Lieu Fee Triggers

Even though Long Beach's hotel inventory in the Five-Mile Zone is shown to be relatively affordable above (\$8.94 less than the Statewide ADR), the CCC's formula will still trigger an in-lieu fee for this inventory. Further, application of the CCC's in-lieu fee formula fails unless the inventory includes a sufficient number of hotels with ADRs below the statewide average.

Table 14 shows, where applicable, the High Cost Point at which an in-lieu fee would be triggered for each inventory:¹⁵⁸

Table 13. In-lieu Fee Triggers for Local Hotel Inventories

Political	Distance From Coast	2-Diamond Hotel Count		Local Low ADR	Local ADR Quotient (Local Low / Statewide)	Local High Cost Range (In-Lieu Fee Trigger)
		Total	Below Statewide ADR (\$163.99)			
City of Long Beach	Coastal Zone	1	0	NA	NA	NA
	Five-Mile Zone	5	1	\$111.76	0.68	> \$216.23
Los Angeles County	Coastal Zone	3	1	\$146.75	0.89	> \$181.23
	Five-Mile Zone	21	9	\$136.84	0.83	> \$191.14
Orange County	Coastal Zone	4	1	\$118.95	0.73	> \$209.04
	Five-Mile Zone	10	1	\$120.40	0.73	> \$207.58
Los Angeles County and Orange County	Coastal Zone	7	2	\$155.26	0.95	> \$172.73
	Five-Mile Zone	31	14	\$138.96	0.85	> \$189.02

The results above highlight a key shortcoming of the CCC formula: Because the CCC formula is based on the hotels with ADRs below the statewide average, the overall affordability of the area is not captured. For example, Long Beach – Five-Mile Zone has an overall ADR of \$155.05 (\$8.94 below the Statewide ADR) and Orange County – Five-Mile Zone has an overall ADR of \$341.85 (\$75.85 above the Statewide ADR). However, the in-lieu fee triggers for the two inventories are very close (above \$216.23 for Long Beach – Five-Mile Zone and above \$207.58 for Orange County – Five-Mile Zone). The Long Beach – Five-Mile Zone represents far greater affordability than the Orange County – Five-Mile Zone, but the formula does not consider this vast difference in triggering the in-lieu fee.

^{158.} See Appendix E for the hotel data and calculations used to produce the Local Low ADR for each inventory.

Chapter 6. Legal Review of In-Lieu Fees

The LCOVA in-lieu fee constitutes a monetary exaction, for which California Courts apply differing standards of review depending on whether the fee is an ad hoc fee or a legislatively imposed fee. This chapter discusses the local authority to require exactions as permit conditions and the Federal and California laws limiting that authority. (The legal analysis presented in this report does not constitute legal advice and is reserved for review by the city attorney.)

6.1. Land Use Regulation Authority

The United States Supreme Court has held that the state and local authority to regulate land use arises from the police power—capacity to regulate for health, safety, and welfare.¹⁵⁹ The Tenth Amendment of the United States Constitution reserves for the states all powers not constitutionally delegated to the federal government; such authority reserved for states includes the police power.¹⁶⁰ The California Constitution further extends the police power, including land use regulation, to its counties and cities.¹⁶¹

6.2. Monetary Exactions

Exactions are a form of land use regulation where the government requires a developer provide either property (property exaction, e.g., deeding an easement) or payment (monetary exaction, e.g., paying in-lieu fees) as a condition for approval of a permit for the proposed development. The purpose of the exaction is to offset identified potential public harms or costs associated with the proposed development. Here, the CCC requires the developer to provide LCOVA facilities (property exaction) or pay an in-lieu fee to fund construction of LCOVA elsewhere (monetary exaction). The CCC's LCOVA in-lieu fee is at issue here.

6.3. Ad Hoc Fees vs. Legislatively Imposed Fees

As mentioned above, the CCC generally requires the in-lieu fee in two cases—one concerning an ad hoc fee and one concerning a legislatively imposed fee.

159. See *Village of Euclid v. Ambler Realty Co.*, 272 U.S. 365, 388 (1926).

160. U.S. Const. amend. X. "The powers not delegated to the United States by the Constitution, nor prohibited by it to the States, are reserved to the States respectively, or to the people" (*ibid.*).

161. See *Village of Euclid*, 272 U.S. at 390-91.

6.3.1. Ad Hoc Fee

First, when a developer applies to the CCC for approval of a development permit, the CCC will impose these conditions ad hoc if it finds that a proposed development would occupy land for which LCOVA would be the preferred use.¹⁶² In this case, the CCC is requiring an ad hoc fee – a mitigation fee determined at agency discretion on a case-by-case basis.

6.3.2. Legislatively Imposed Fee

Second, when a city applies to the CCC for approval of a LCP or policy under the Commission’s jurisdiction, the CCC will condition approval on the city adopting the LCOVA in-lieu fee. In this case the city is required to implement a legislatively imposed fee – a mitigation fee codified by statute, typically applied formulaically, leaving no room for agency discretion.

6.4. Legal Standards

The United States Supreme Court announced the constitutional rules governing property exactions in *Nollan v. California Coastal Commission* (the essential nexus requirement)¹⁶³ and *Dolan v. City of Tigard* (the rough proportionality requirement).¹⁶⁴ In *Koontz v. St. Johns River Water Management District*, the Court clarified that the same rules also apply to monetary exactions,¹⁶⁵ but left unclear whether the rules apply equally to ad hoc and legislatively-imposed fees.¹⁶⁶ However, the California Supreme Court, considering *Nollan*, *Dolan*, and the state’s Mitigation Fee Act,¹⁶⁷ has articulated differing legal standards for ad hoc fees versus legislatively imposed fees in cases of monetary exactions.¹⁶⁸ California Courts apply the *Nollan* and *Dolan*’s essential nexus and rough proportionality requirements to ad hoc fees and the Mitigation Fee Act’s reasonable relationship requirement to legislatively imposed fees.¹⁶⁹

162. See Cal. Pub. Res. Code § 30222. “The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry” (ibid.).

163. *Nollan v. Cal. Coastal Comm’n*, 483 U.S. 825, 837 (1987).

164. *Dolan v. City of Tigard*, 512 U.S. 374, 391 (1994).

165. *Koontz v. St. Johns River Water Mgmt. Dist.*, 570 U.S. ___, 133 S. Ct. 2586, 2603 (2013).

166. Ibid. at 2608 (Kagan, J., dissenting).

167. The Mitigation Fee Act is codified in Cal. Gov’t Code §§ 6600, et seq.

168. See *San Remo Hotel v. City and County of San Francisco*, 27 Cal. 4th 643, 670-671 (2002).

169. Ibid.

6.4.1. Federal Law

As discussed below, the federal constitutional requirements concerning exactions — essential nexus and rough proportionality — are grounded in principals of the unconstitutional conditions doctrine and the Fifth Amendment Takings Clause.¹⁷⁰

6.4.1.1. Unconstitutional Conditions Doctrine and the Fifth Amendment Takings Clause

The United States Supreme Court reviews exactions under legal principals of the unconstitutional conditions doctrine and the Fifth Amendment Takings Clause. Under the unconstitutional conditions doctrine, the government may not condition a benefit upon waving a constitutional right.¹⁷¹ Under the Fifth Amendment Takings Clause, the government may not take private property, unless for public use and with just compensation (expressed in terms of market value of the loss).¹⁷² In exaction cases, the Court considers whether the exaction (property or monetary) required for permit approval is an unconstitutional condition in that it unduly burdens the applicant's rights to just compensation under the Fifth Amendment Takings Clause.¹⁷³

6.4.1.2. Essential Nexus and Rough Proportionality

For a property or monetary exaction to be a valid land use regulation and not a taking, the United States Supreme Court requires it meets the essential nexus and rough proportionality tests of *Nollan* and *Dolan*, respectively.¹⁷⁴ The essential nexus test is satisfied if the permit condition (the exaction) serves the same purpose and the objective of the condition (offsetting the potential public harms or costs of the proposed development).¹⁷⁵ The rough proportionality test is satisfied if the exaction is roughly proportional to potential public harms or costs of the proposed development.¹⁷⁶

Further, the Court in *Koontz* held that the *Nollan* and *Dolan* decisions apply to exactions (property or monetary) whether or not the permit was eventually approved or denied by the government.¹⁷⁷ The government must offer the applicant at least one constitutional alternative

170. Beyond the unconstitutional conditions doctrine and the Fifth Amendment Takings Clause, the Fourteenth Amendment Equal Protection Clause (No state shall “deny to any person within its jurisdiction the equal protection of the laws” (U.S. Const. Amend. XIV, § 1.)), may be relevant to legal review of the LCOVA in-lieu fee. A developer could potentially argue that the CCC has biasedly handpicked the cases to which it applied the LCOVA in-lieu fee. In response, the CCC may argue that such is the nature of the imposition of ad hoc fees.

171. *Koontz*, 133 S. Ct. at 2593.

172. *Ibid.*

173. *Ibid.*

174. *Ibid.* at 2603.

175. *Nollan*, 483 U.S. at 837.

176. *Dolan*, 512 U.S. at 391.

177. *Koontz*, 133 S. Ct. at 2603.

for approval. However, as noted in Justice Kagan's dissent, Justice Alito's majority opinion in *Koontz* is unclear as to whether the *Nollan* and *Dolan* decisions apply to ad hoc fees (the type of fee at issue in *Koontz*) as well as legislatively imposed fees.¹⁷⁸

6.4.2. California Law

In addition to the *Nollan* and *Dolan* decisions, California Courts cite the state's Mitigation Fee Act as a governing statute in monetary exaction cases.

6.4.2.1. Reasonable Relationship

The Mitigation Fee Act requires the local agency imposing the fee, whether ad hoc or legislative, to show that there exists a reasonable relationship between the intended use of the fee and the impact of the proposed development and a reasonable relationship between the amount of the fee and the impact of the proposed development.¹⁷⁹ As shown below, California Courts consider the reasonable relationship test less stringent than the essential nexus and rough proportionality tests.

6.4.2.2. Standards for Ad Hoc Fees vs. Legislatively Imposed Fees

The California Supreme Court first required that monetary exactions satisfy the essential nexus and rough proportionality requirements in *Ehrlich v. City of Culver City*.¹⁸⁰ In that case and those subsequent, the Court articulated delineation in standard of review for ad hoc fees versus legislatively imposed fees.¹⁸¹ The Court explained that legislatively imposed fees must only meet the reasonable relationship test under the Mitigation Fee Act, while ad hoc fees must meet the heightened scrutiny of the essential and rough proportionality tests.

178. Ibid. at 2608 (Kagan, J., dissenting). "Perhaps the Court means in the future to curb the intrusion into local affairs that its holding will accomplish; the Court claims, after all, that its opinion is intended to have only limited impact on localities' land-use authority. The majority might, for example, approve the rule, adopted in several States, that *Nollan* and *Dolan* apply only to permitting fees that are imposed ad hoc, and not to fees that are generally applicable. See, e.g., *Ehrlich v. Culver City*, 12 Cal. 4th 854, 911 P. 2d 429 (1996). *Dolan* itself suggested that limitation by underscoring that there 'the city made an adjudicative decision to condition petitioner's application for a building permit on an individual parcel,' instead of imposing an 'essentially legislative determination[] classifying entire areas of the city.' 512 U. S., at 385. Maybe today's majority accepts that distinction; or then again, maybe not. At the least, the majority's refusal 'to say more' about the scope of its new rule now casts a cloud on every decision by every local government to require a person seeking a permit to pay or spend money" (some citations omitted) (ibid.).

179. Cal. Gov't Code, § 6601; See *San Remo Hotel*, 27 Cal. 4th at 671.

180. *Ehrlich v. City of Culver City*, 12 Cal. 4th 854, 881 (1996).

181. Explained above in this chapter, an ad hoc fee is determined at agency discretion on a case-by-case basis, while a legislatively imposed fee is codified by statute leaving, typically applied formulaically, leaving no room for agency discretion.

In *San Remo Hotel v. City and County of San Francisco*, the Court explained its distinction in standards of review was based on a comparative degree of political checks:

While legislatively mandated fees do present some danger of improper leveraging, such generally applicable legislation is subject to the ordinary restraints of the democratic political process. A city council that charged extortionate fees for all property development, unjustifiable by mitigation needs, would likely face widespread and well-financed opposition at the next election. Ad hoc individual monetary exactions deserve special judicial scrutiny mainly because, affecting fewer citizens and evading systematic assessment, they are more likely to escape such political controls.¹⁸²

6.5. Taking or a Special Tax

Should a monetary exaction be successfully challenged, it may be found to be either a taking or special tax under California law.

6.5.1. Taking

A monetary exaction that does not pass its applicable legal standards may be considered a taking under the Fifth Amendment, which would require just compensation be paid for the loss.¹⁸³

6.5.2. Special Tax

Further, a fee that fails the reasonable relationship test when applicable may be considered a special tax—a tax levied for a specific purpose—and would then be subject to a public vote. Under California Constitution, special taxes are prohibited unless approved by a two-thirds vote in the jurisdiction.¹⁸⁴ The Mitigation Fee Act sets special procedures for challenging a fee as a special tax.¹⁸⁵ Should the challenger meet the procedural requirements set forth in the Mitigation Act, the burden placed on the government to demonstrate:

(1) [T]he estimated costs of the service or regulatory activity, and (2) the basis for determining the manner in which the costs are apportioned, so that the charges allocated to a payor bear a fair or reasonable relationship to the payor's burdens on or benefits from the regulatory activity.¹⁸⁶

182. *San Remo Hotel*, 27 Cal 4th at 671.

183. *Koontz*, 133 S. Ct. at 2599.

184. Cal. Const. art. XIII A, § 4. “Cities, Counties and special districts, by a two-thirds vote of the qualified electors of such district, may impose special taxes on such district, except ad valorem taxes on real property or a transaction tax or sales tax on the sale of real property within such City, County or special district” (ibid.).

185. Cal. Gov’t Code § 66020.

186. *San Diego Gas & Elec. Co. v. San Diego County Air Pollution Control Dist.*, 203 Cal.App.3d 1132, 1146.

However, the California Supreme Court held that “[s]imply because a fee exceeds the reasonable cost of providing the service or regulatory activity for which it is charged does not transform it into a tax,” noting that a tax is used for unrelated purposes from which the charge generates.¹⁸⁷

187. *Barratt Am., Inc. v. City of Rancho Cucamonga*, 37 Cal. 4th 685, 700 (2005).

Chapter 7. Legality of the \$30,000/25% Fee

As explained in Chapters 2, 3, and 4, the CCC required the LCOVA in-lieu fee upon case-by-case permit review (as an ad hoc fee) and upon review of jurisdictions' LCPs or related policy (as a legislatively imposed fee to be adopted by the jurisdiction). Chapter 5 provides hotel rate data as a quantitative context Chapter 6 sets forth the standards for legal review for both instances. As shown in this chapter, the \$30,000/25% fee likely fails the applicable legal tests when required as an ad hoc fee or a legislatively imposed fee, particularly when applied within Long Beach. (The legal analysis presented in this report does not constitute legal advice and is reserved for review by the city attorney.)

7.1. As an Ad Hoc Fee

The CCC applies the LCOVA in-lieu fee as an ad hoc fee when it imposes the fee on a case-by-case basis as a condition to approval of a CDP. A coastal jurisdiction with a certified LCP, like Long Beach, could also choose to impose the LCOVA in-lieu fee as a condition for approval for a CDP. Under Federal and California Law, ad hoc fees must meet the essential nexus and rough proportionality requirements of *Nollan* and *Dolan*.¹⁸⁸ As generally applied in case-by-case permit review by the CCC or a local coastal jurisdiction, the LCOVA in-lieu fee most likely passes the essential nexus test, but likely fails the rough proportionality test.

7.1.1. Essential Nexus

In *Nollan*, the United States Supreme Court held that an essential nexus must exist between permit condition and the objective of the permit condition—a legitimate state interest.¹⁸⁹ The Court explained,

In short, unless the permit condition serves the same governmental purpose as the development ban, the building restriction is not a valid regulation of land use, but “an out-and-out plan of extortion.”¹⁹⁰

To satisfy *Nollan*'s nexus requirement, the CCC's objective to mitigate exclusion of LCOVA facilities along the coast must be a legitimate state interest, and the LCOVA in-lieu fees must serve this objective. The LCOVA in-lieu fees most likely pass the essential nexus test.

188. Ibid. at 670.

189. *Nollan*, 483 U.S. at 837.

190. Ibid.

7.1.1.1. Legitimate State Interest

Under *Nollan*, the objective of the permit condition must be a “legitimate state interest.”¹⁹¹ The United States Supreme Court has upheld a broad range of land use objectives as constituting a legitimate state interest, including scenic zoning, landmark preservation, and residential zoning.¹⁹² Because the objective is derived from State legislation establishing land use priorities along the coast, the CCC’s objective in this matter is most likely a legitimate state interest.

Across staff reports, the CCC points to two sections of the Coastal Act validating LCOVA mitigation policy – 30213¹⁹³ and 30222.¹⁹⁴ First, the CCC cites Section 30213 of the Public Resources Code, which charges the Commission to protect, encourage, and, where feasible, provide for lower cost visitor and recreational facilities along the State’s coast.¹⁹⁵ Second, the CCC cites Section 30222 of the Public Resources Code, which prioritizes development of visitor-serving uses along the coast over private residential, general industrial, or general commercial uses.¹⁹⁶

Given its support in state statute, and that the Supreme Court has found scenic zoning and landmark preservation to be legitimate state interests, the CCC’s objective to encourage and provide for LCOVA facilities is most likely a legitimate state interest.

7.1.1.2. The Nexus

Under *Nollan*’s essential nexus test, the permit condition and the objective of the permit condition must serve the same legitimate government interest.¹⁹⁷ For an essential nexus to exist for the LCOVA in-lieu fee, the fee must serve the objective of the fee – to mitigate preclusion of LCOVA facilities along the coast. Given the prescribed use of the fee, the LCOVA in-lieu fees most likely meets essential nexus requirement.

191. Ibid.

192. Ibid. at 834-835.

193. Cal. Pub. Res. Code § 30213.

194. Ibid. § 30222.

195. San Diego Area Office, 6-13-0407 (*McMillin-NTC, LLC*), 27.

196. California Coastal Commission, South Central Coast Area Office, *Agenda Item 15b, Thursday, July 10, 2014, City of San Buenaventura Local Coastal Program Amendment No. SBV-MAJ-2-12, Th15b-7-2014*, (Ventura, CA, 2014), 5-6. This CCC staff report concerned an amendment City of Ventura LCP to allow mixed-use residential parcels to be built on parcels formally zoned to allow overnight visitor accommodations. The CCC staff considered this amendment a preclusion of LCOVA facilities and required that the City charge the developer a \$1.8 million fee to provide for LCOVA accommodations. In a letter to the CCC dated July 3, 2014, the Pacific Legal Foundation questioned whether the amendment lawfully triggered an in-lieu fee given the ruling in *Koontz* that such fees must meet the essential nexus and rough proportionality requirements. In the staff report, the CCC responded to the essential nexus issue explaining that Section 30222 establishes a state interest in the CCC interest in preventing the preclusion of LCOVA facilities. The staff report, however, did not seem to respond to the rough proportionality issue.

197. *Nollan*, 483 U.S. at 837.

Here, a proposed development's impact, as identified by the CCC, is the preclusion of LCOVA facilities on site. Explained by CCC staff,

The expectation of the Commission, based upon several precedents, is that developers of sites suitable for overnight accommodations will provide facilities which serve people with a range of incomes. If development cannot provide for a range of affordability on-site, the Commission requires off-site mitigation.¹⁹⁸

When imposed by CCC, LCOVA in-lieu fees are expressly collected for the “the acquisition, construction or renovation of lower cost accommodations along the California Coast.”¹⁹⁹ In a 2010 accounting by the CCC, of the \$19.2 million in LCOVA in-lieu fees available (\$16.7 million in fees collected since 1979 earning \$2.5 million in interest), the CCC spent \$8.6 million toward LCOVA preclusion mitigation (e.g., funding new campgrounds, RV sites, or hostels)..²⁰⁰ These facilities include, among other projects construction of a 260-bed hostile in Santa Monica, a 100-bed hostile in Santa Barbara, and rehabilitation of the Crystal Cove Cottages.²⁰¹

In general, the intended and actual use of the LCOVA in-lieu fees serve the same legitimate government interest as the objective of the fee—to mitigate preclusion of LCOVA facilities along the coast—thus meeting the essential nexus requirement.²⁰²

7.1.2. Rough Proportionality

In *Dolan*, the United States Supreme Court held that a permit condition must be roughly proportional to the potential harm of the proposed development.²⁰³ The Court explained,

No precise mathematical calculation is required, but the city must make some sort of individualized determination that the required dedication is related both in nature and extent to the impact of the proposed development.²⁰⁴

198. San Diego Area Office, 6-13-0407 (*McMillin-NTC, LLC*), 27-28.

199. California Coastal Commission, *Status Report on In-Lieu Fee Mitigation for Impacts to Lower-Cost Overnight Accommodations*, by Peter M. Douglas, Susan Hanscj, Charles Lester, Elizabeth A. Fuchs, Nicholas Dreher, F14c-5-2010, (San Francisco, CA, 2010), 1.

200. Ibid.

201. Ibid., 6-12.

202. The issue here is not whether or not the fee is effective in its service of the legitimate state interest. In *Lingle v. Chevron U. S. A. Inc.*, 544 U.S. 528 (2005), the United States Supreme Court held that the “substantially advance[s] a legitimate state interest” test is not appropriate for cases under Fifth Amendment Takings Clause. In her majority opinion, Justice O'Connor explained that the “substantially advances” test is a question of whether the regulation was effective, and does not explain whether the regulation was a taking—a question of the “magnitude or character of the burden a particular regulation imposes upon private property rights” (ibid. at 542).

203. *Dolan*, 512 U.S. at 391.

204. Ibid.

California Courts have emphasized the decision's use of the terms "individualized determination" and "nature and extent to the impact."²⁰⁵ For the LCOVA in-lieu fee to satisfy *Dolan's* rough proportionality requirement, the CCC must make an individualized determination that the fee is roughly proportional to the nature and extent of the proposed development's impact. The LCOVA in-lieu fee likely fails this test.

7.1.2.1. Nature and Extent of Impact

To determine whether the LCOVA in-lieu fee is roughly proportional in nature and extent to offending development impacts, the nature and extent of the impact must first be identified. As mentioned above, the CCC's position is not that a development necessarily creates a need for LCOVA facilities, but that it precludes the provision of LCOVA facilities on that site. However, the significance of the impact of the preclusion likely varies based on location.

7.1.2.1.1. LCOVA Preclusion

The following three examples illustrate the CCC's classification of the impact.

- A non-hotel development, such as a residential subdivision, on land suitable for LCOVA facilities would likely comprise a total preclusion of LCOVA facilities.²⁰⁶
- A hotel development where all room rates are in the higher price range may also comprise a total preclusion of LCOVA facilities.
- A hotel development includes a mix of LCOVA and higher prices facilities may be considered less than a total preclusion of LCOVA facilities.²⁰⁷

This position considers nature and extent of the impact of LCOVA preclusion in absolute terms, which is compatible with the context of a state-wide deficiency of LCOVA supply presented by CCC staff reports; if the LCOVA facility inventory for the California Coastal Zone at-large is lacking, then all lost opportunities to construct new facilities could be counted as virtually equal impacts. However, a California precedent likely requires that the impact be defined in a narrower scope.

205. *Ocean Harbor House Homeowners Ass'n v. Cal. Coastal Comm'n*, 163 Cal.App.4th 215, 229 (2008).

206. *City of San Buenaventura No. City of San Buenaventura*, 5. This CCC staff report concerned an amendment City of Ventura LCP to allow mixed-use residential parcels to be built on parcels formally zoned to allow overnight visitor accommodations. The CCC staff considered this amendment a preclusion of LCOVA facilities and required that the City charge the developer a \$1.8 million fee to provide for LCOVA accommodations.

207. San Diego Area Office, 6-13-0407 (*McMillin-NTC, LLC*), 33-34. As discussed in Chapter 4, in the 2200 Lee Court project, the CCC imposed a \$30,000/12.5% fee given the development's proposed free amenities and accommodation of rooms for more guests.

7.1.2.1.2. Impacts in the Local Context

In *California Building Industry Association v. City of San Jose*,²⁰⁸ the California Court of Appeal for the Sixth District related the holding in *Shapell Industries, Inc. v. Governing Board*,²⁰⁹

In *Shapell* the very purpose of the school facilities fee was to accommodate a growing student population and reduce overcrowding of schools *caused by* new development. The fee was improper to the extent that the assessment was based on an estimated increase in student population overall rather than on the increase generated by the new housing itself. We declined to second-guess the district's methods of deriving its supporting data, but we insisted that a “reasoned analysis” be conducted “to establish the requisite connection between the amount of the fee imposed and the burden created” by the development. (Citation omitted). The district was required only to “make a reasonable choice after considering the relevant factors.” (Citation omitted). Thus, it had to “demonstrate that development contributes to the need for the facilities, and that its choices as to what will adequately accommodate the influx of students are *reasonably based*.” (Citation omitted).²¹⁰

In *Shapell*, the Court found that a fee charged to a specific development must be based on that development’s impact, not a wider trend indicating a need for additional public facilities. As discussed above, the CCC defines the impact of developments charged the LCOVA in-lieu fee as preclusion of LCOVA facilities along the California coast—an impact tied to the statewide trend. However, the nature and extent of the impact of LCOVA preclusion likely varies depending on the location of the development.

Consider Long Beach’s relative affordability in coastal overnight accommodations compared to that of Orange County elucidated in Chapter 5. A lost opportunity to build a LCOVA facility would be less significant an impact in Long Beach, which maintains a relatively lower or moderately-priced cost hotel stock, than in Orange County, which has a relatively higher-priced hotel stock.

Accordingly, a more accurate identification of the extent and nature of the impact would include the degree of LCOVA preclusion in context of the local conditions.

7.1.2.2. Individualized Determination of Rough Proportionality

Under *Dolan*, The United States Supreme Court requires that the agency make an individual determination, with some effort to quantify its findings, that the fee is roughly proportional to the impact of the development.²¹¹ As mentioned above, the CCC applies a

208. *Cal. Building Industry Ass’n v. City of San Jose*, 216 Cal.App.4th 1373 (2013).

209. *Shapell Industries, Inc. v. Governing Board*, 1 Cal.App.4th 218 (1991).

210. *Cal. Building Industry Ass’n*, 216 Cal.App.4th at 1386. The Court explained that the test applied in *Shapell* “was drawn from *California Hotel & Motel Assn v. Industrial Welfare Com.* (1979) 25 Cal.3d 200, 212 [157 Cal.Rptr. 840, 599 P.2d 31]: ‘A court will uphold the agency action unless the action is arbitrary, capricious, or lacking in evidentiary support. A court must ensure that an agency has adequately considered all relevant factors, and has demonstrated a rational connection between those factors, the choice made, and the purposes of the enabling statute’” (ibid. at 1385).

211. *Dolan*, 512 U.S. at 391.

formula to define the higher cost range—the room rates at which the LCOVA in-lieu fee is triggered for a development project. Typically, the CCC imposes the \$30,000/25% fee for a proposed development’s rooms in the higher cost range. This method cannot individually determine a LCOVA in-lieu fee roughly proportional to the nature and extent of impacts of proposed development for three reasons:

1. It will virtually always generate an in-lieu fee for nearly any proposed hotel development;
2. It fails to adequately account for local conditions, such as existing LCOVA facilities and other accommodations; and
3. The in-lieu fee it imposes is not supported by substantial evidence.²¹²

7.1.2.2.1. Regular Generation of an In-Lieu Fee

First, the CCC’s formula cannot individually determine a fee roughly proportional to the development’s impact because the formula virtually always generates a fee. As explained above, the formula calculates an in-lieu fee by identifying the Local High Cost Range, based on a difference between the Local Low ADR (the average ADR for hotels below the Statewide ADR) and Statewide ADR. So long as the local hotel inventory includes at least one hotel with an ADR below the Statewide average, the formula will produce an in-lieu fee. A local hotel inventory that includes no hotels below the Statewide ADR will confound the formula and fail to generate an in-lieu fee. Further, as discussed below, the Local Low ADR does not adequately measure the affordability of the local hotel inventory.

7.1.2.2.2. Local Conditions

Second, the CCC’s formula does not adequately account for local conditions concerning overnight accommodations affordability, and therefore cannot produce an in-lieu fee roughly proportional to the development’s impacts, for three reasons:

1. The Local ADR does not represent the overall affordability of the inventory,
2. Facilities defined by the CCC as inherently LCOVA are not included, and
3. Local lower-cost hotels included in the Statewide ADR are not included in the local hotel inventory for purposes of the formula.

212. *Cal. Building Industry Ass’n*, 216 Cal.App.4th at 1386.

7.1.2.2.2.1. Local Low ADR

The Local Low ADR does not represent the overall affordability of the local hotel inventory. Consider the following illustration of hypothetical City A and City B with an assumed Statewide ADR of \$130:

Table 14. Hypothetical Hotel Inventories for City A and City B

Hotel	1	2	3	4	5	6	7	8	9	10
City A	\$125	\$125	\$125	\$125	\$125	\$125	\$125	\$125	\$130	\$150
City B	\$90	\$110	\$130	\$130	\$150	\$150	\$175	\$175	\$200	\$200

Amounts in red fall below assumed statewide ADR of \$130.

Table 15. Hypothetical ADR Figures for City A and City B

Hotel	Local ADR	Local Low ADR	Statewide ADR	Local High Cost Range
City A	\$128	\$125	\$130	\$135
City B	\$151	\$100		\$160

As shown in Tables 12 and 13, eight of ten hotels in City A are below the Statewide ADR, while only two of ten hotels in City B are below the Statewide ADR. Further, City A's overall ADR (\$128) is \$2 below the Statewide ADR (\$130), while City B's overall ADR (\$151) is \$31 above. Indecently, the Local Low ADR for City A (\$125) is higher than for City B (\$100). However, these figures that demonstrate relative affordability are not factored into the Local Low ADR. Considering the Statewide ADR, the Local High Cost Range for City A is \$135 and for City B is \$160. This means that a hotel built in City A will pay the \$30,000/25% fee for rooms over \$135, which is a harsher penalty than would be exacted on City B.

Because the formula may produce a harsher penalty for a City with greater hotel affordability than another, the LCOVA in-lieu fee is likely not applied in a manner roughly proportional.

7.1.2.2.2.2. "Inherently Lower Cost" Inventory

When compiling the local hotel inventory, the CCC draws from AAA-rated properties, which excludes facilities the CCC considers as "inherently lower cost," such as hostiles, campsites, and potentially RV parks.²¹³ Therefore, these facilities may not contribute to a Local Low ADR. Because the formula fails to account for the local stock of inherently LCOVA facilities, the formula is again producing an in-lieu fee absent consideration the full picture of local affordability.

213. South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 33.

7.1.2.2.2.3. AAA-rated Properties

Further, the CCC compiles local hotel inventories from a different subset of hotels in California than is used for the statewide average. As discussed in Chapter 3, the CCC only considers AAA-rated properties when surveying hotels within the defined relevant local area to identify the Local Low ADR to ensure only quality hotels are counted. However, the Smith Travel Research (“STR”) trend reports, from which the CCC obtains the Statewide ADR figure, likely include rates of many hotels that are not AAA-rated. Hotels that are not AAA-rated may be lower cost than those that are. Accordingly, a local area’s lower cost non-AAA-rated hotels counted in the Statewide ADR may not be counted towards the local area’s affordability.

The CCC’s different application of AAA ratings in inventories presents two problems with assessments of hotel affordability in the state and local areas. The first problem is the possible deflation of the Statewide ADR and inflation of the local area ADR, which in turn impacts the CCC’s imposition of the in-lieu fee. The second problem is a negation of a quality control measure enacted by the CCC in local hotel inventories, since the CCC applies this measure to the local inventory, but not the statewide. These two problems further hinder the formula’s capacity to produce a fee that is roughly proportional.

7.1.2.2.3. Source of the \$30,000 Base Fee

Third, the \$30,000/25% fee was likely derived from a source with conflicting interests and therefore likely not based on substantial evidence. As discussed in Chapter 3, the CCC, in 2006, determined the \$30,000 base fee for the LCOVA in-lieu fee based on information provided by Hostelling International (“HI”) – a nonprofit global membership organization of youth hostels.²¹⁴ However, the CCC has in some cases named HI as an option a jurisdiction may select to manage the LCOVA in-lieu fee account.²¹⁵ However, Hostelling International and its affiliate organization, American Youth Hostels (“AYH”) (also known as Hostelling International USA),²¹⁶ have also been primary beneficiaries of this in-lieu fee.

In 2010, the CCC produced an inventory of “CCC Special Deposit Account Funds held by the State Controller.”²¹⁷ The inventory covered 19 cases where accounts were created. HI or AYH was the recipient of the funds in seven cases and the intended recipient in two.²¹⁸ Given HI’s status as a CCC-designated recipient of the LCOVA in-lieu fees, it is most likely a biased source on which to rely for the amount of the fee.

214. Hostelling International, “About Hostelling International,” last modified 2014, <https://www.hihostels.com/about-hi/about-hostelling-international>

215. South Coast Area Office, 5-13-0717, 1429 Hermosa, LLC, 18.

216. Hostelling International USA, “About HI-USA,” last modified 2013, <http://www.hiusa.org/about-us>

217. California Coastal Commission, *Status Report on In-Lieu Fees*, 6-12.

218. *Ibid.*

7.2. As a Legislatively Imposed Fee

When the CCC requires that a city adopt the \$30,000/25% fee as a condition of approval of the city's LCP or related policy, city will generally adopt the fee as a legislatively imposed ordinance. Along with the differences between ad hoc fees and legislatively imposed fees, there is another key distinction: As a legislatively imposed fee, the \$30,000/25% is part of the city's municipal code, meaning that the city, not the CCC, is entity ultimately responsible for the enforcement and operation of the fee. Accordingly, in this case, the city is party burdened with defense the \$30,000/25% fee's legality.

California Courts apply a different standard for legislatively imposed fees than ad hoc fees. The standard for legislatively imposed fees—the reasonable relationship test—is derived from the state's Mitigation Fee Act. The California Supreme Court articulated the elements of this test as follows:

As a matter of both statutory and constitutional law, such fees must bear a reasonable relationship, in both [1] intended use and [2] amount, to the deleterious public impact of the development.²¹⁹

The Court has explained that the reasonable relationship test, although less stringent than the essential nexus and rough proportionality tests, is still a “meaningful means-ends review.”²²⁰

While the relationship between means and ends need not be so close or so thoroughly established for legislatively imposed fees as for ad hoc fees subject to *Ehrlich*, the arbitrary and extortionate use of purported mitigation fees, even where legislatively mandated, will not pass constitutional muster.²²¹

Explained above, the reasonable relationship test is composed of two elements:

1. The fee's intended use must be reasonably related to the development's impact, and
2. The fee's amount must be reasonably related to the development's impact.

When the \$30,000/25% fee is adopted by a jurisdiction as required by the CCC as a condition to approval of an LCP or related policy, it is likely that the \$30,000/25% fee fails the reasonable relationship test. The fee may bare a reasonable relationship between its intended use and the development's impact, but the relationship between the fee's amount and the development's impact is likely insufficiently distant.

219. *San Remo Hotel*, 12 Cal. 4th at 671.

220. *Ibid.*

221. *Ibid.*

7.2.1. Use of Fees-to-Impact of Development Connection

Under the Mitigation Fee Act, there must exist a reasonable relationship between the intended use of the fees and the impact of the proposed development. This element of the reasonable relationship test is virtually the same principle as *Nollan's* essential nexus test. Here again, the development's impact is LCOVA preclusion and the intended use of the fees is LCOVA provision. Imposed legislatively, the \$30,000/25% fee likely bears a reasonable relationship between its intended use and the development's impact.²²²

7.2.2. Amount of Fee-to-Impact of Development Connection

Under the Mitigation Fee Act, there must also exist a reasonable relationship between the amount of the fees and the impact of the development. This element of the reasonable relation test is similar to, but less strict than, to the rough proportionality test. Imposed legislatively, the fee amount-impact connection for the \$30,000/25% fee is likely far too attenuated to pass muster under the reasonable relationship test.

Shown in breakdown performed in Chapter 3, there are three numbers that determine the amount of the LCOVA in-lieu fee:

- The definition higher cost rooms (determined by formula),
- The base fee (\$30,000), and
- The rate at which the base fee is charged (25 percent of higher cost rooms).

Three of the four case studies in Chapter 4 concern the adoption of the LCOVA in-lieu fee byway of LCP:

- City of Ventura, LCP Amendment (2008),
- City of Long Beach, LCP Amendment (2010), and
- City of Solana Beach, LCP Land Use Plan (2012).

222. Other legislatively-imposed fees required by the CCC as a condition for approval of an LCP may not bear a reasonable relationship between its intended use and the development's impact. As explained in Chapters 1 and 4, the 2010 amendment to Long Beach's LCP included, as a CCC condition, two legislatively imposed fees: A version of the \$30,000/25% fee and a one-time \$1.5 million fee (South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 29-30, 36; Long Beach, California, Ordinance No. ORD-11-0017, 16-18). The \$1.5 million fee is charged to the applicant if a hotel of at least 100 rooms is not developed within the first or second phase of the Golden Shore Master Plan (Long Beach, California, Ordinance No. ORD-11-0017, 16-17). The intended use of the fee is to fund LCOVA facilities (such as hostiles, RV parks, and campgrounds) "within or in close proximity to the coastal zone" (*ibid.*, 16). It is unclear, however, what development impact is necessitating that a fee be paid to fund LCOVA facilities. If no hotel or other project is built, then there is still an opportunity for LCOVA facilities to be built. In this situation, there is likely no impact of LCOVA preclusion reasonably related to a fee to fund LCOVA.

Table 14 shows that each of the three case studies, the CCC, with minor exception, locked in the number for each of the three figures as a condition of approval:

Table 16. Local Discretion in Adoption of the LCOVA In-Lieu Fee

City of Ventura, LCP Amendment (2008)	City of Long Beach, LCP Amendment (2010)	City of Solana Beach, LCP Land Use Plan (2012)
Definition of Higher Cost Rooms		
Set at 25% greater than Statewide ADR.	Set at 25% greater than Statewide ADR.	Set at 20% greater than Statewide ADR, with some flexibility for reevaluation over time.
Base Fee		
Set at \$30,000.	Set at \$30,000.	Set at \$30,000 (in 2007) and adjusted for inflation.
Rate at Which Base Fee is Charged		
Set at 25%.	Set at 25%.	Set at 25%.

This element of the reasonable relationship test is discussed below in two contexts:

- For legislatively-imposed LCOVA in-lieu fees enacted in coastal jurisdictions, generally,
- As a legislatively-imposed LCOVA in-lieu fee enacted in Long Beach, specifically.

7.2.2.1. Enacted in Coastal Jurisdictions, Generally

As explained in Chapter 6, legislatively imposed fees are distinguished from ad hoc fees, in part, because legislatively imposed fees are imposed without discretion and are crafted through the political process for approval by an elected body. As required by the CCC in the cases above, the \$30,000/25% fee leaves the local jurisdiction little to no room for discretion in the fee's application. The concern here, however, is that the fees were determined without sufficient consideration of local affordability conditions. As discussed earlier in this chapter all three figures (the definition of higher cost rooms, the base fee, and rate at which the base fee is charged) present issues of bias and lack of specificity. Accordingly, there is likely an insufficient connection between the fee's amount and the development's impact.

7.2.2.2. Enacted in Long Beach, Specifically

Explained in Chapter 1 and as a case study in Chapter 4, Long Beach adopted the \$30,000/25% fee by ordinance in an amendment to its LCP.²²³ Based on reasoning in the CCC's

223. Long Beach, California, Ordinance No. ORD-11-0017, 17-18.

staff report concerning the amendment, when enacted in Long Beach, the amount of \$30,000/25% fee likely does not bear a reasonable relationship to the impacts of the proposed developments, for three reasons:

- The fee does not account for the local affordability conditions;
- The definition of lower cost hotel rates (determining to which rooms the fee applies) was based primarily on an inventory from the City of Ventura, not Long Beach; and
- The fee is applied to 25% of all rooms, not just higher-priced rooms.

7.2.2.2.1. Long Beach Conditions

First, the \$30,000/25% fee fails to account for the City of Long Beach's relatively affordable existing hotel inventory. Shown in Chapter 5, Long Beach's hotel stock along the coast is considerably more affordable than areas in the region and relatively affordable compared to all coastal counties.

The local coastal affordability conditions in Long Beach do not appear to have been sufficiently considered by the CCC when suggesting the City adopt the \$30,000/25% fee. As CCC staff explained:

Although Long Beach (downtown and inland) has a substantial supply of lower-cost motels, there are no overnight accommodations in the Downtown Shoreline area that would be considered affordable or lower-cost. In addition, these lower cost motels are located outside of the coastal zone and could be replaced by higher cost hotels or motels or other uses in the future.²²⁴

However, this statement fails to account for the affordable stock of hotels along the coast in Long Beach, as illustrated in Chapter 5.²²⁵ Also, the CCC offers no evidence to demonstrate the likelihood that lower cost accommodations in Long Beach "could be replaced by higher cost hotels or motels or other uses in the future."²²⁶ Without such evidence, this contention is likely far too attenuated to justify imposition of a fee.

Further, the \$30,000/25% fee considers the particular LCOVA needs created by a hotel development in Long Beach. The \$30,000/25% fee is based on generalized hostel financing figures provided to the CCC by HI and does not speak to needs in Long Beach. Further, applying the principle from *Shappel*, the \$30,000/25% fee is likely suited to address an overall statewide trend rather than an impact of a specific hotel development in Long Beach. This scope

224. South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 33.

225. According to the STR trend reports, the July and August 2010 figures for the City of Long Beach were \$132.73 for the Coastal Zone and \$111.57 for the Five-Mile Zone. The July and August 2010 Statewide ADR was \$116.71.

226. South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 33.

is likely too broad in reach and too distant from Long Beach to meet the reasonable relationship test.

7.2.2.2.2. Ventura Source for Definition of Lower Cost

Second, the CCC's definition of lower cost hotel rates is also likely not reasonably related to the proposed impact of a hotel development in Long Beach. As explained in the staff report, the CCC drew from a hotel inventory in Ventura to arrive at a definition of lower cost in Long Beach.

The hotel room rates in Long Beach are similar to Ventura's rates. Therefore, the definition of low cost accommodations in Long Beach will be defined (for the suggested modification pertaining to Subarea 1a) as those charging less than seventy-five percent (75%), or twenty-five percent (25%) below, the statewide average daily room rate during peak season.²²⁷

The CCC staff report explained the purpose for use of the Ventura rate in the Long Beach LCP Amendment,

A similar comprehensive study [referencing the Ventura case] of all the hotels in Long Beach has not been conducted, although a sampling (2009) of the hotels in or near the Downtown Shoreline area has been done.²²⁸

However, the CCC's sampling of hotels revealed that the hotels around the Downtown Shoreline area in Long Beach are not necessarily comparable to the hotel stock studied in Ventura. For Ventura, the CCC's study of the hotel stock yielded the following results: "Rates then between \$104.50 and \$166.00 would be considered moderately priced for the City of Ventura."²²⁹ For Long Beach, the CCC identified the rates for six "[h]igher-cost hotels in the downtown [Long Beach] area:" "Avia (\$155), Hilton (\$141), Hyatt (\$144), newly renovated Maya (\$155), Renaissance (\$155), and Westin (\$147)."²³⁰ Each of these six CCC-identified "higher-cost" hotels in Long Beach fall within the "moderately priced" range established for Ventura.²³¹

Because the CCC's evidence seems more applicable to Ventura than to Long Beach, the resulting definition of lower cost likely cannot generate a fee amount reasonably related to the impacts of development in Long Beach.

227. Ibid., 34.

228. Ibid.

229. Ibid.

230. Ibid.

231. Ibid.

7.2.2.2.3. 25 Percent of all Rooms

Third, because the version of the \$30,000/25% fee adopted by Long Beach may apply to 25 percent of all rooms for any hotel without LCOVA facilities, the charge levied on a Long Beach hotel development in this case is more punitive than as generally applied on an ad hoc basis by the CCC.

As explained earlier, the CCC generally applied the \$30,000/25% fee to 25 percent of all rooms deemed to be in the Local High Cost Range. As shown above, the CCC-identified “higher-cost” hotels in Long Beach’s downtown would be classified as “moderately priced” based on Ventura hotel rates.²³² Accordingly, based on the CCC’s assumption that Long Beach rates are similar Ventura rates, the \$30,000/25% fee would not be applicable to any hotel in Long Beach’s downtown.

However, the Long Beach LCP Amendment seems to apply the \$30,000/25% fee per all rooms, not just higher cost rooms.²³³ Under this application of the fee, hotels developments under the Long Beach LCP Amendment would likely pay a greater total in-lieu fee than under the typical application of the fee.

Given that the CCC’s assumptions suggest that Long Beach’s hotel stock around the Downtown Shoreline area are relatively affordable, the application of the fee to 25% of all rooms is not reasonably related to the impact of a hotel development in Long Beach.

232. Ibid.

233. Long Beach, California, Ordinance No. ORD-11-0017.

Chapter 8. Recommendations

The preceding chapters present a number of policy and legal problems posed by the LCOVA mitigation fee, particularly as applied in Long Beach. This chapter presents recommendations for the City as it contends with existing and future CCC-required LCOVA mitigation in three situations:

- When facing a CCC-required fee,
- After adoption of a CCC-required fee,
- As a prominent coastal jurisdiction offering input to the CCC.

8.1. When Facing a CCC-Required Fee

Given Chapter 7's findings that the \$30,000/25% fee, when imposed legislatively, likely fails the reasonable relationship test under the Mitigation Fee Act, Long Beach should thoroughly vet the CCC's required LCOVA in-lieu before adopting the fee into its municipal code. Further, given the findings in Chapter 5, Long Beach should insist on an individualized survey of coastal hotel affordability. If no affordability issue exists, Long Beach should challenge the necessity of LCOVA mitigation in its local context. If an affordability issue should arise in Long Beach, the City should:

- Propose to the CCC an alternative mitigation measure, or
- Propose a reduced fee that best reflect the local conditions.

8.1.1. Propose and Alternative Mitigation Measure

The Ventura LCP Amendment case discussed in Chapter 4 suggests that that CCC may be open to entertaining alternative approaches to LCOVA mitigation other than the \$30,000/25% fee. Developing an alternative may require expenditures toward data collection to determine the local affordability conditions, but would likely lead to fewer challenges from developers and cause less complications during implementation.

8.1.2. Propose a Reduced Fee

The 2200 Lee Court case discussed in Chapter 4 may be instructive for the City. In this case, the CCC agreed to reduce the rate at which the base fee (\$30,000) is applied (from 25 percent to 12.5 percent), effectively reducing the total fee by half, after the developer agreed to provide lower cost visitor serving amenities and outfit a number of standard-priced rooms to be

comfortably occupied by a family of six.²³⁴ Two qualifications should be considered when pursuing this approach:

- First, the 2200 Lee Court case made clear that CCC would require both the amenities and an effort reduce rates (such as outfitting the rooms for more people) to consider a reduced LCOVA in-lieu fee.²³⁵
- Second, the degree to which prior CCC staff reports and decisions serve as authoritative precedents is unclear. Although CCC staff reports often cite prior reports and decision in a manner that suggests the weight of precedents, they may not be necessarily binding of in future cases.²³⁶

8.2. After Adoption of a CCC-Required Fee

Once the City adopts a CCC-required fee by ordinance, it has relatively fewer options to oppose the fee. In this situation, the CCC is less relevant as the entity that requires the City adopt the fee as a condition to approval. Instead, the City is the entity responsible for implementing the fee as part of its own body of laws. Although a developer may challenge a city's LCOVA mitigation fee, the developer's and city's interests may be aligned. Two avenues may be available for the City to reduce the potential fallout over its adopted LCOVA mitigation fee:

- Adapt the mitigation measures in a mitigation plan, or
- Challenge the fee as outside the realm of its authority.

8.2.1. Adaptation in the Mitigation Plan

The formulaic nature of legislatively-imposed fees leaves little room for negotiation for the City or developer. However, the City may find room to adapt the mitigation measure, in a

234. San Diego Area Office, 6-13-0407 (*McMillin-NTC, LLC*), 33.

235. *Ibid.*, 34.

236. See South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 34-35. "[T]he expectation of the Commission is that developers of sites suitable for overnight accommodations will provide facilities which serve people with a range of incomes. If the development cannot provide for a range of affordability on-site, then off-site mitigation has been required in past commission actions [HNB-MAJ-2-06 (Huntington Beach-Timeshares), San Diego Unified Port District Port District A-6-PSD-8-04/101(Lane Field), A-5-RPV-2-324 (Long Point), RDB-MAJ-2-08 (Redondo Beach), SBV-MAJ-2-08 (Ventura) & 5-98-156-A17 (Long Beach Pike)]...Recent Commission decisions for individual development projects (6-92- 203-A4/KSL, A-6-ENC-07-51, Oceanside LCPA 1-07 & Redondo Beach LCPA 2-08) have required the payment of an in-lieu charge of \$30,000 paid for each required replacement room as a part of the mitigation package. For high cost overnight visitor accommodations where low cost alternatives are not included onsite, a mitigation charge of \$30,000 per room is being required for twenty-five percent (25%) of the high cost rooms constructed (Permit Amendment 5-98-156-A17)" (*ibid.*).

manner consistent with CCC policy and the Long Beach LCP, to better suit the local conditions and meet the applicable California and federal legal standards. For example, the City could consider how the mitigation plan precisely defines LCOVA facilities or how the mitigation plan specifically guides or directs expenditures of the collected funds. The mitigation plan should carefully reference the governing local ordinance, Coastal Act provisions, Mitigation Fee Act provisions, and CCC policy governing the implementation of the mitigation measures.

8.2.2. Challenge the Fee as Beyond the City's Authority

Long Beach may have recourse under the Coastal Act for the City's previously adopted LCOVA mitigation fee measures. California Coastal Section 30005.5 limits the CCC's authority to require cities to enact laws outside of the city's authority:

Nothing in this division [the Coastal Act] shall be construed to authorize any local government, or to authorize the commission to require any local government, to exercise any power it does not already have under the Constitution and laws of this state or that is not specifically delegated pursuant to Section 30519 [which sets forth the procedure for preparation, approval, and certification of LCPs].²³⁷

Accordingly, the CCC cannot condition approval of a city's application for an LCP amendment or other policy upon the city adopting an ordinance beyond its authority, such as violating the Constitution or the Mitigation Fee Act. However, since the CCC approved the LCP amendment, it is unclear if the CCC may or may not revisit the LCOVA issue in the LCP amendment should the fees be stricken as unenforceable.

8.3. Offering Input to the CCC

As mentioned in Chapter 1, the CCC recently revisited its policy and practice regarding LCOVA mitigation. As a prominent coastal city, Long Beach may be in a position to offer the CCC input on the deliberation of this issue. Long Beach could encourage the CCC to consider:

- Develop a LCOVA mitigation practice that better reflects the local hotel affordability conditions. If local conditions are more accurately accounted for in the fee generation formula, it may be a step to remedying the *Dolan* problems.
- Reevaluate the \$30,000 base fee amount reasoning with greater transparency and with additional sources beyond the HI letter.
- Explain the reasoning behind the 25 percent figure. CCC staff reports yield little to no relevant information as to how this figure was developed.
- Clarify the role of CCC staff reports and decisions as precedents for future actions.

²³⁷. Cal. Pub. Res. Code § 30005.5.

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Appendix A. California Coastal Premium Analysis: Hotel Inventories and Maps

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A1. Introduction

Appendix A presents the hotel inventories and maps for the California coastal premium analysis performed in Chapter 5. The two inventories studied for this analysis are shown in Table A1.

Table A1. Inventories for California Coastal Premium Analysis

Political	Distance From Coast	Hotel Count
California Coastal Counties	Coastal Zone	228
California Coastal Counties	Five-Mile Zone	471

As explained in Chapter 5, the hotels in these inventories participate STR surveys, are located in the Coastal Zone or Five-Mile Zone, and are AAA-rated.

The 471 hotels in the California Coastal Counties – Five-Mile Zone inventory also serve as the master list for unique hotels used for data analysis. Some of these hotels will also appear in the CCC inventories presented in Appendix B for the CCC local costs analysis. For cross-references purposes, each hotel is assigned a unique identification number (ID) from 000 to 471.

A2. Hotel Inventories

Tables A2 through A16 list the hotels for the California coastal premium inventories. The tables are organized by county from north (Del Norte County) to south (San Diego County). To avoid redundancy in presentation, each hotel is listed only once. Each table includes the AAA-rated hotels in the respective county's Five-Mile Zone. The hotels in each table are divided into two groups:

- Hotels in the Coastal Zone, and
- Hotels outside the Coastal Zone, but inside the Five-Mile Zone.

The Coastal Zone inventory consists only of the hotels listed in the first group. The Five-Mile Zone inventory consists of hotels listed in both groups.

Each county's table is ordered by zone (the two groups described above, city, then zip code). The ID is the hotel's unique number from unique 000 to 471. The list number (No.) is the hotel's position on the list under the group heading – to the table, but not across all inventories.

Table A2. Del Norte County Hotel Inventory (3 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (2 hotels)										
1	001	Del Norte	CZ	Best Western Northwoods Inn	655 Us Highway 101 S	Crescent City	95531	41.7514440	-124.1810860	3
2	002	Del Norte	CZ	Holiday Inn Express Klamath Redwood National Park Area	171 Klamath Blvd.	Klamath	95548	41.5295460	-124.0391740	3
Outside Coastal Zone, Inside Five-Mile Zone (1 hotel)										
1	003	Del Norte	FZ	Econo Lodge Crescent City	725 U.S. 101	Crescent City	95531	41.7645970	-124.1939860	2

Table A3. Humboldt County Hotel Inventory (13 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (4 hotels)										
1	004	Humboldt	CZ	Quality Inn Arcata	3535 Janes Rd	Arcata	95521	40.8996989	-124.0917945	2
2	005	Humboldt	CZ	Red Lion Hotel Eureka	1929 4th St	Eureka	95501	40.8050930	-124.1504390	3
3	006	Humboldt	CZ	Clarion Hotel Eureka	2223 4th St	Eureka	95501	40.8050910	-124.1476780	3
4	007	Humboldt	CZ	Rodeway Inn Eureka	2014 4th St	Eureka	95501	40.8045392	-124.1495697	2
Outside Coastal Zone, Inside Five-Mile Zone (9 hotels)										
1	008	Humboldt	FZ	Best Western Arcata Inn	4827 Valley West Boulevard	Arcata	95521	40.9021330	-124.0837640	2
2	009	Humboldt	FZ	Days Inn & Suites Arcata	4701 Valley W Blvd	Arcata	95521	40.9014160	-124.0837460	2
3	010	Humboldt	FZ	Howard Johnson Express Arcata	4700 Valley W Blvd	Arcata	95521	40.9012285	-124.0830202	2
4	011	Humboldt	FZ	Hampton Inn & Suites	4750 Valley West Blvd	Arcata	95524	40.9020725	-124.0834611	3
5	012	Humboldt	FZ	Best Western Humboldt Bay Inn	232 W 5th St	Eureka	95501	40.8008480	-124.1745190	3
6	013	Humboldt	FZ	Quality Inn Eureka	1209 4th St	Eureka	95501	40.8039627	-124.1581471	2
7	014	Humboldt	FZ	Days Inn Eureka	270 5th St	Eureka	95501	40.8013550	-124.1673240	2
8	015	Humboldt	FZ	Comfort Inn Humboldt Bay Eureka	4260 Broadway St	Eureka	95503	40.7709312	-124.1911795	3
9	016	Humboldt	FZ	Holiday Inn Express & Suites Arcata Eureka Airport	3107 Concorde Dr	McKinley ville	95519	40.9680660	-124.1107190	3

Table A4. Mendocino County Hotel Inventory (3 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (2 hotels)										
1	017	Mendocino	CZ	Super 8 Fort Bragg	888 S Main St	Fort Bragg	95437	39.4302090	-123.8058070	2
2	018	Mendocino	CZ	Holiday Inn Express Fort Bragg	250 Highway 20	Fort Bragg	95437	39.4192230	-123.8041220	3
Outside Coastal Zone, Inside Five-Mile Zone (1 hotel)										
1	019	Mendocino	FZ	Best Western Vista Manor Lodge	1100 N Main St	Fort Bragg	95437	39.4578960	-123.8051280	2

Table A5. Sonoma County Hotel Inventory (1 hotel)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (1 hotel)										
1	020	Sonoma	CZ	Bodega Bay Lodge & Spa	103 California 1	Bodega Bay	94293	38.3179580	-123.0327720	4

Table A6. Marin County Hotel Inventory (5 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Outside Coastal Zone, Inside Five-Mile Zone (5 hotels)										
1	021	Marin	FZ	Holiday Inn Express Mill Valley San Francisco Area	160 Shoreline Hwy	Mill Valley	94941	37.8818990	-122.5188900	3
2	022	Marin	FZ	Mill Valley Inn	165 Throckmorton Ave	Mill Valley	94941	37.9053488	-122.5493906	3
3	023	Marin	FZ	Acqua Hotel	555 Redwood Hwy	Mill Valley	94941	37.8879120	-122.5174529	3
4	024	Marin	FZ	Inn Above Tide	30 El Portal	Sausalito	94965	37.8556180	-122.4785780	3
5	025	Marin	FZ	Lodge @ Tiburon	1651 Tiburon Blvd	Southeast Marin	94920	37.8748700	-122.4575720	3

Table A7. San Francisco County Hotel Inventory (10 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Outside Coastal Zone, Inside Five-Mile Zone (10 hotels)										
1	026	San Francisco	FZ	Joie De Vivre Hotel Tomo	1800 Sutter St	San Francisco	94115	37.7868070	-122.4302290	2
2	027	San Francisco	FZ	Joie De Vivre Hotel Kabuki	1625 Post St	San Francisco	94115	37.7855970	-122.4285180	3
3	028	San Francisco	FZ	Hotel Drisco	2901 Pacific Avenue	San Francisco	94115	37.7920711	-122.4430521	3
4	029	San Francisco	FZ	Joie De Vivre Laurel Inn	444 Presidio Ave	San Francisco	94115	37.7873790	-122.4467220	3
5	030	San Francisco	FZ	La Luna Inn	2599 Lombard St	San Francisco	94123	37.7986020	-122.4434630	2
6	031	San Francisco	FZ	Travelodge San Francisco @ Presidio	2755 Lombard St	San Francisco	94123	37.7983200	-122.4466890	2
7	032	San Francisco	FZ	Howard Johnson San Francisco Marina District	1940 Lombard St	San Francisco	94123	37.8005220	-122.4335110	2
8	033	San Francisco	FZ	Country Hearth Inn San Francisco	2707 Lombard St	San Francisco	94123	37.7984970	-122.4461870	2
9	034	San Francisco	FZ	Comfort Inn by the Bay San Francisco	2775 Van Ness Ave	San Francisco	94920	37.8010390	-122.4252260	2
10	035	San Francisco	FZ	Hotel Del Sol	3100 Webster St	San Francisco	94920	37.8000892	-122.4335458	3

Table A8. San Mateo County Hotel Inventory (8 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (7 hotels)										
1	036	San Mateo	CZ	Half Moon Bay Lodge	2400 Cabrillo Hwy S	Half Moon Bay	94019	37.4332270	-122.4275422	3
2	037	San Mateo	CZ	Beach House Inn & Conference Center	4100 Cabrillo Hwy N	Half Moon Bay	94019	37.5019149	-122.4741380	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
3	038	San Mateo	CZ	Ritz Carlton Half Moon Bay	1 Miramontes Point Rd	Half Moon Bay	94019	37.4338745	-122.4412107	4
4	039	San Mateo	CZ	Comfort Inn Half Moon Bay	2930 Cabrillo Hwy N	Half Moon Bay	94019	37.4919150	-122.4528230	3
5	040	San Mateo	CZ	Mill Rose Inn	615 Mill St	Half Moon Bay	94019	37.4651060	-122.4306240	4
6	041	San Mateo	CZ	Best Western Lighthouse Hotel	105 Rockaway Beach Ave	Pacifica	94044	37.6097270	-122.4963730	3
7	042	San Mateo	CZ	Holiday Inn Express Hotel & Suites Pacifica	519 Nick Gust Way	Pacifica	94044	37.6086839	-122.4964540	3
Outside Coastal Zone, Inside Five-Mile Zone (1 hotel)										
1	043	San Mateo	FZ	Hampton Inn	2700 Junipero Serra Blvd	Daly City	94920	37.6907710	-122.4714007	3

Table A9. Santa Cruz County Hotel Inventory (20 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (7 hotels)										
1	044	Santa Cruz	CZ	Seascape Beach Resort & Conference Center	1 Seascape Resort Dr	Aptos	95003	36.9507063	-121.8769390	4
2	045	Santa Cruz	CZ	Best Western Capitola By Sea	1435 41st Ave	Capitola	95010	36.9711439	-121.9654405	3
3	046	Santa Cruz	CZ	Fairfield Inn & Suites Santa Cruz Capitola	1255 41st Ave	Capitola	95010	36.9697890	-121.9655280	3
4	047	Santa Cruz	CZ	Super 8 Santa Cruz Beach Boardwalk W	321 Riverside Ave	Santa Cruz	95060	36.9666260	-122.0184830	2
5	048	Santa Cruz	CZ	Howard Johnson Inn Santa Cruz	130 West Cliff Drive	Santa Cruz	95060	36.9635655	-122.0251252	2
6	049	Santa Cruz	CZ	Super 8 Santa Cruz Beach Boardwalk E	338 Riverside Ave	Santa Cruz	95060	36.9673810	-122.0183730	2
7	050	Santa Cruz	CZ	Comfort Inn Beach Boardwalk	314 Riverside Ave	Santa Cruz	95060	36.9670190	-122.0182190	2
Outside Coastal Zone, Inside Five-Mile Zone (13 hotels)										
1	051	Santa Cruz	FZ	Best Western Seacliff Inn	7500 Old Dominion Ct	Aptos	95003	36.9791273	-121.9101238	3
2	052	Santa Cruz	FZ	Quality Inn & Suites Capitola By The Sea	720 Hill St	Capitola	95010	36.9826730	-121.9541880	2
3	053	Santa Cruz	FZ	The Hotel Paradox	611 Ocean St	Santa Cruz	95060	36.9768350	-122.0207540	3
4	054	Santa Cruz	FZ	Best Western Inn	126 Plymouth St	Santa Cruz	95060	36.9852822	-122.0229238	2
5	055	Santa Cruz	FZ	Ramada Limited	516 Water Street	Santa Cruz	95060	36.9799269	-122.0198164	2
6	056	Santa Cruz	FZ	Quality Inn Santa Cruz	1101 Ocean Street	Santa Cruz	95060	36.9817650	-122.0230130	2
7	057	Santa Cruz	FZ	Inn at Pasatiempo	555 California 17	Santa Cruz	95060	37.0003460	-122.0225110	3
8	058	Santa Cruz	FZ	Comfort Inn Santa Cruz	110 Plymouth Street	Santa Cruz	95060	36.9849663	-122.0229617	2
9	059	Santa Cruz	FZ	Best Western All Suite Inn	500 Ocean St	Santa Cruz	95060	36.9750720	-122.0185810	3
10	060	Santa Cruz	FZ	Hampton Inn	1505 Ocean Street	Santa Cruz	95060	36.9847574	-122.0239284	3
11	061	Santa Cruz	FZ	Holiday Inn Express Hotel & Suites Santa Cruz East	1410 Ocean Street	Santa Cruz	95060	36.9842954	-122.0228059	3
12	062	Santa Cruz	FZ	Chaminade	1 Chaminade Lane	Santa Cruz	95065	36.9981850	-121.9849720	4
13	063	Santa Cruz	FZ	Holiday Inn Express & Suites Watsonville	1855 Main St	Watsonville	95076	36.9167970	-121.7807160	3

Table A10. Monterey County Hotel Inventory (52 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (26 hotels)										
1	064	Monterey	CZ	Joie De Vivre Ventana Inn	48123 California 1	Big Sur	93920	36.2281900	-121.7604380	4
2	065	Monterey	CZ	Dolphin Inn	San Carlos St	Carmel	93921	36.5583320	-121.9217230	2
3	066	Monterey	CZ	Svendsgaard's Inn	San Carlos St & 4th Ave	Carmel	93921	36.5582880	-121.9221460	3
4	067	Monterey	CZ	Wayside Inn	Mission St	Carmel	93921	36.5535440	-121.9207090	3
5	068	Monterey	CZ	Pine Inn	Monte Verde St Ocean Ave between Lincoln St	Carmel	93921	36.5553890	-121.9240370	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
6	069	Monterey	CZ	Candle Light Inn	San Carlos between 4th & 5th Avenue	Carmel	93921	36.5574850	-121.9222540	2
7	070	Monterey	CZ	Best Western Carmel's Town House Lodge	Corner of San Carlos St and Fifth Ave	Carmel	93923	36.5572230	-121.9219580	3
8	071	Monterey	CZ	Carriage House Inn	Junipero between 7th & 8th Avenue	Carmel	93923	36.5528970	-121.9202930	4
9	072	Monterey	CZ	Colonial Terrace Inn	San Antonio Ave & 13th Ave	Carmel	93923	36.5463837	-121.9278189	3
10	073	Monterey	CZ	Tickle Pink Inn	155 Highland Dr	Carmel	93923	36.5003840	-121.9367160	4
11	074	Monterey	CZ	Hyatt Carmel Highlands	120 Highlands Dr	Carmel	93923	36.5019220	-121.9374880	4
12	075	Monterey	CZ	Best Western Beach Dunes Inn	3290 Dunes Dr	Marina	93933	36.7003150	-121.8045397	2
13	076	Monterey	CZ	Quality Inn Monterey Beach Dunes Marina	3280 Dunes Dr	Marina	93933	36.6993700	-121.8050120	1
14	077	Monterey	CZ	Sanctuary Beach Resort	3295 Dunes Rd	Marina	93933	36.6996160	-121.8054840	3
15	078	Monterey	CZ	Holiday Inn Express & Suites Marina	189 Seaside Ave	Marina	93933	36.6922950	-121.8021240	3
16	079	Monterey	CZ	Monterey Plaza Hotel & Spa	400 Cannery Row	Monterey	93922	36.6125760	-121.8979420	4
17	080	Monterey	CZ	Best Western Beach Resort Mont	2600 Sand Dunes Dr	Monterey	93940	36.6108690	-121.8583920	3
18	081	Monterey	CZ	Spindrift Inn	652 Cannery Row	Monterey	93940	36.6154690	-121.8996480	3
19	082	Monterey	CZ	Portola Hotel & Spa @ Monterey	2 Portola Plaza	Monterey	93940	36.6016370	-121.8944290	4
20	083	Monterey	CZ	Monterey Bay Inn	242 Cannery Row	Monterey	93940	36.6110370	-121.8970360	3
21	084	Monterey	CZ	La Quinta Inns & Suites Monterey	2401 Del Monte Ave	Monterey	93940	36.6057810	-121.8602210	2
22	085	Monterey	CZ	Hotel Pacific	300 Pacific St	Monterey	93940	36.6021600	-121.8956940	3
23	086	Monterey	CZ	InterContinental The Clement Monterey	750 Cannery Row	Monterey	93940	36.6168180	-121.9007230	4
24	087	Monterey	CZ	Asilomar Conference Grounds	800 Asilomar Ave	Pacific Grove	93950	36.6192274	-121.9357301	2
25	088	Monterey	CZ	Martine Inn	255 Ocean View Blvd	Pacific Grove	93950	36.6205930	-121.9085970	3
26	089	Monterey	CZ	Green Gables Inn	301 Ocean View Blvd	Pacific Grove	93950	36.6206650	-121.9094480	3
Outside Coastal Zone, Inside Five-Mile Zone (26 hotels)										
1	090	Monterey	FZ	Carmel Mission Inn	3665 Rio Rd	Carmel	93923	36.5398040	-121.9084170	3
2	091	Monterey	FZ	Ramada Marina	323 Reservation Rd	Marina	93933	36.6835390	-121.7903750	3
3	092	Monterey	FZ	Marriott Monterey	350 Calle Principal	Monterey	93940	36.6005840	-121.8953040	4
4	093	Monterey	FZ	Best Western De Anza Inn	2141 Fremont St	Monterey	93940	36.5967810	-121.8609540	3
5	094	Monterey	FZ	Best Western Monterey Inn	825 Abrego St	Monterey	93940	36.5940224	-121.8921753	3
6	095	Monterey	FZ	Best Western Park Crest Motel	1100 Munras Ave	Monterey	93940	36.5905910	-121.8966660	3
7	096	Monterey	FZ	Super 8 Monterey Munras Area	1300 Munras Ave	Monterey	93940	36.5857380	-121.9008150	2
8	097	Monterey	FZ	Best Western Plus Victorian Inn	487 Foam St	Monterey	93940	36.6127450	-121.9003110	3
9	098	Monterey	FZ	Comfort Inn Monterey By The Sea	1252 Munras Ave	Monterey	93940	36.5877400	-121.8996120	2
10	099	Monterey	FZ	Comfort Inn Monterey Bay	2050 N Fremont St	Monterey	93940	36.5955480	-121.8643580	2
11	100	Monterey	FZ	Hyatt Regency Monterey	1 Old Golf Course Rd	Monterey	93940	36.5927200	-121.8769352	3
12	101	Monterey	FZ	Hilton Garden Inn Monterey	1000 Aguajito Rd	Monterey	93940	36.5911130	-121.8822530	3
13	102	Monterey	FZ	The Casa Munras	700 Munras Ave	Monterey	93940	36.5954510	-121.8932570	3
14	103	Monterey	FZ	Ramada Limited Monterey North	2058 N Fremont St	Monterey	93940	36.5956740	-121.8640260	2
15	104	Monterey	FZ	Clarion Monterey	1046 Munras Ave	Monterey	93940	36.5911700	-121.8958910	3
16	105	Monterey	FZ	Hotel Abrego	755 Abrego St	Monterey	93940	36.5943860	-121.8918190	3
17	106	Monterey	FZ	Mariposa Inn	1386 Munras Ave	Monterey	93940	36.5840660	-121.9022210	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
18	107	Monterey	FZ	Days Inn Monterey Carmel	1288 Munras Ave	Monterey	93940	36.5866000	-121.9001540	2
19	108	Monterey	FZ	Vagabond Inn Monterey	1010 Munras Ave	Monterey	93940	36.5915390	-121.8953240	2
20	109	Monterey	FZ	Days Inn Monterey	850 Abrego St	Monterey	93940	36.5936630	-121.8927720	2
21	110	Monterey	FZ	Quality Inn Monterey	2075 Fremont St	Monterey	93940	36.5964850	-121.8639590	3
22	111	Monterey	FZ	Comfort Inn Monterey Peninsula Airport	1200 Olmsted Rd	Monterey	93940	36.5846010	-121.8503720	3
23	112	Monterey	FZ	Holiday Inn Express Monterey Cannery Row	443 Wave St	Monterey	93940	36.6124490	-121.8992120	3
24	113	Monterey	FZ	Ramada Limited Monterey Carmel	1182 Cass St	Monterey	93940	36.5892570	-121.8979970	2
25	114	Monterey	FZ	Gosby House Inn	643 Lighthouse Ave	Pacific Grove	93950	36.6216660	-121.9194670	3
26	115	Monterey	FZ	Howard Johnson Express Monterey Pacific Grove / BEST WESTERN The Inn & Suites Pacific Grove	660 Dennett St	Pacific Grove	93950	36.6199860	-121.9331910	2

Table A11. San Luis Obispo County Hotel Inventory (37 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (34 hotels)										
1	116	San Luis Obispo	CZ	Avila Lighthouse Suites	550 Front St	Avila Beach	93424	35.1794080	-120.7354469	3
2	117	San Luis Obispo	CZ	Castle Inn by the Sea	6620 Moonstone Beach Dr	Cambria	93428	35.5784520	-121.1152320	2
3	118	San Luis Obispo	CZ	San Simeon Pines Seaside Resort	7200 Moonstone Beach Dr	Cambria	93428	35.5831810	-121.1198010	2
4	119	San Luis Obispo	CZ	Fogcatcher Inn	6400 Moonstone Beach Dr	Cambria	93428	35.5759730	-121.1129980	3
5	120	San Luis Obispo	CZ	Sand Pebbles Inn	6252 Moonstone Beach Dr	Cambria	93428	35.5736830	-121.1123150	3
6	121	San Luis Obispo	CZ	Blue Dolphin Inn	6470 Moonstone Beach Dr	Cambria	93428	35.5767140	-121.1135340	3
7	122	San Luis Obispo	CZ	Pelican Cove Inn	6316 Moonstone Beach Dr	Cambria	93428	35.5745590	-121.1123610	3
8	123	San Luis Obispo	CZ	White Water Inn	6790 Moonstone Beach Dr	Cambria	93428	35.5804240	-121.1171290	2
9	124	San Luis Obispo	CZ	Econo Lodge Morro Bay	1100 Main St	Morro Bay	93422	35.3691040	-120.8496860	2
10	125	San Luis Obispo	CZ	Comfort Inn Downtown Morro Bay	590 Morro Ave	Morro Bay	93422	35.3638350	-120.8508380	3
11	126	San Luis Obispo	CZ	Ascend Collection Hotel Ascot Suites	260 Morro Bay Blvd	Morro Bay	93422	35.3656260	-120.8506470	3
12	127	San Luis Obispo	CZ	Best Western El Rancho	2460 Main St	Morro Bay	93442	35.3872480	-120.8573190	3
13	128	San Luis Obispo	CZ	Best Western San Marcos Inn	250 Pacific St	Morro Bay	93442	35.3646660	-120.8507530	3
14	129	San Luis Obispo	CZ	Best Western Tradewinds	225 Beach St	Morro Bay	93442	35.3690280	-120.8526310	2
15	130	San Luis Obispo	CZ	Days Inn Morro Bay	1095 Main St	Morro Bay	93442	35.3681486	-120.8501788	2
16	131	San Luis Obispo	CZ	Inn at Morro Bay	60 State Park Rd	Morro Bay	93442	35.3531640	-120.8437620	3
17	132	San Luis Obispo	CZ	Sundown Motel	640 Main St	Morro Bay	93442	35.3643748	-120.8498364	2
18	133	San Luis Obispo	CZ	Blue Sail Inn	851 Market Ave	Morro Bay	93442	35.3664700	-120.8526500	2
19	134	San Luis Obispo	CZ	Embarcadero Inn	456 Embarcadero	Morro Bay	93442	35.3619406	-120.8520309	3
20	135	San Luis Obispo	CZ	Best Western Shore Cliff Lodge	2555 Price St	Pismo Beach	93449	35.1512260	-120.6579720	3
21	136	San Luis Obispo	CZ	Seacrest Resort	2241 Price St	Pismo Beach	93449	35.1479010	-120.6495680	3
22	137	San Luis Obispo	CZ	Edgewater Motel Incorporated	280 Wadsworth Ave	Pismo Beach	93449	35.1429586	-120.6436127	2
23	138	San Luis Obispo	CZ	Cottage Inn by the Sea	2351 Price St	Pismo Beach	93449	35.1487400	-120.6504820	3
24	139	San Luis Obispo	CZ	Seaventure Resort	100 Ocean View Ave	Pismo Beach	93449	35.1367130	-120.6410440	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
25	140	San Luis Obispo	CZ	Spyglass Inn	2705 Spyglass Dr	Pismo Beach	93449	35.1631600	-120.6882770	3
26	141	San Luis Obispo	CZ	Best Western Shelter Cove Lodg	2651 Price St	Pismo Beach	93449	35.1500953	-120.6541509	3
27	142	San Luis Obispo	CZ	The Cliffs Resort	2757 Shell Beach Rd	Pismo Beach	93449	35.1653380	-120.6907690	3
28	143	San Luis Obispo	CZ	Oxford Suites Pismo Beach	651 5 Cities Dr	Pismo Beach	93449	35.1354074	-120.6212551	3
29	144	San Luis Obispo	CZ	Sandcastle Inn	100 Stimson Ave	Pismo Beach	93449	35.1378153	-120.6415751	3
30	145	San Luis Obispo	CZ	Pismo Lighthouse Suites	2411 Price St	Pismo Beach	93449	35.1493503	-120.6513377	3
31	146	San Luis Obispo	CZ	Hilton Garden Inn San Luis Obispo Pismo Beach	601 James Way	Pismo Beach	93449	35.1369090	-120.6206820	3
32	147	San Luis Obispo	CZ	Best Western Cavalier Oceanfro	9415 Hearst Drive	San Simeon	93452	35.6142060	-121.1464680	3
33	148	San Luis Obispo	CZ	Quality Inn San Simeon	9260 Castillo Dr	San Simeon	93452	35.6129480	-121.1433300	2
34	149	San Luis Obispo	CZ	The Morgan San Simeon	9135 Hearst Dr	San Simeon	93452	35.6110350	-121.1431010	3
Outside Coastal Zone, Inside Five-Mile Zone (3 hotels)										
1	150	San Luis Obispo	FZ	BEST WESTERN Casa Grande Inn	850 Oak Park Blvd	Arroyo Grande	93420	35.1318895	-120.6057191	3
2	151	San Luis Obispo	FZ	Hampton Inn	1400 W Branch St	Arroyo Grande	93420	35.1293219	-120.6016334	3
3	152	San Luis Obispo	FZ	Holiday Inn Express Hotel Grover Beach-Pismo Beach Area	775 N Oak Park Blvd	Grover Beach	93433	35.1296640	-120.6082260	3

Table A12. Santa Barbara County Hotel Inventory (22 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (8 hotels)										
1	153	Santa Barbara	CZ	Best Western Carpinteria Inn	4558 Carpinteria Ave	Carpinteria	93013	34.4023260	-119.5258980	3
2	154	Santa Barbara	CZ	Holiday Inn Express & Suites Carpinteria	5606 Carpinteria Ave	Carpinteria	93013	34.3925390	-119.5094940	3
3	155	Santa Barbara	CZ	Inn By The Harbor	433 W Montecito St	Santa Barbara	93101	34.4096390	-119.6981720	3
4	156	Santa Barbara	CZ	Brisas del Mar	223 Castillo St	Santa Barbara	93101	34.4098850	-119.6972910	3
5	157	Santa Barbara	CZ	Coast Hotel West Beach Inn	306 W Cabrillo Blvd	Santa Barbara	93101	34.4089540	-119.6933520	3
6	158	Santa Barbara	CZ	Lavender Inn By The Sea	206 Castillo St	Santa Barbara	93101	34.4103670	-119.6965110	3
7	159	Santa Barbara	CZ	Hyatt Regency Santa Barbara	1111 E Cabrillo Blvd	Santa Barbara	93103	34.4174520	-119.6706680	3
8	160	Santa Barbara	CZ	Doubletree Fess Parkers Resort	633 E Cabrillo Blvd	Santa Barbara	93103	34.4165080	-119.6769200	4
Outside Coastal Zone, Inside Five-Mile Zone (14 hotels)										
1	161	Santa Barbara	FZ	Hotel Goleta	5650 Calle Real Goleta	Goleta	93117	34.4417180	-119.8209820	3
2	162	Santa Barbara	FZ	Best Western South Coast Inn	5620 Calle Real	Goleta	93117	34.4411841	-119.8199626	3
3	163	Santa Barbara	FZ	Hampton Inn Santa Barbara Goleta	5665 Hollister Ave	Goleta	93117	34.4352780	-119.8223280	3
4	164	Santa Barbara	FZ	The Upham Hotel Country Hous	1404 De La Vina St	Santa Barbara	93013	34.4232491	-119.7093854	3
5	165	Santa Barbara	FZ	Best Western Beachside Inn	336 W Cabrillo Blvd	Santa Barbara	93101	34.4085565	-119.6935275	2
6	166	Santa Barbara	FZ	La Quinta Inns & Suites Santa Barbara	1601 State St	Santa Barbara	93101	34.4270100	-119.7101030	2
7	167	Santa Barbara	FZ	Holiday Inn Express Virginia Santa Barbara	17 W Haley St	Santa Barbara	93101	34.4162150	-119.6959710	3
8	168	Santa Barbara	FZ	Simpson House Inn	121 E Arrellaga St	Santa Barbara	93101	34.4290610	-119.7080340	4
9	169	Santa Barbara	FZ	Best Western Encina Lodge And Suites	2220 Bath St	Santa Barbara	93105	34.4302880	-119.7209350	3
10	170	Santa Barbara	FZ	Best Western Plus Pepper Tree Inn	3850 State St	Santa Barbara	93105	34.4407480	-119.7487010	3
11	171	Santa Barbara	FZ	Quality Inn Santa Barbara	3055 De La Vina St	Santa Barbara	93105	34.4399950	-119.7299970	2
12	172	Santa Barbara	FZ	Ramada Limited Santa Barbara	4770 Calle Real	Santa Barbara	93110	34.4440200	-119.7875910	3
13	173	Santa Barbara	FZ	Pacifica Suites	5490 Hollister Ave	Santa Barbara	93111	34.4358180	-119.8159270	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
14	174	Santa Barbara	FZ	Extended Stay America Santa Barbara Calle Real	4870 Calle Real	Santa Barbara	93111	34.4434260	-119.7915120	2

Table A13. Ventura County Hotel Inventory (14 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (11 hotels)										
1	175	Ventura	CZ	Embassy Suites Mandalay Beach Hotel & Resort	2101 Mandalay Beach Rd	Oxnard	93035	34.1788930	-119.2360140	3
2	176	Ventura	CZ	Hampton Inn Channel Islands Harbor	3231 Peninsula Rd	Oxnard	93035	34.1705930	-119.2257460	3
3	177	Ventura	CZ	Holiday Inn Express Port Hueneme	350 E Port Hueneme Rd	Port Hueneme	93041	34.1469870	-119.1964920	3
4	178	Ventura	CZ	Crowne Plaza Ventura Beach	450 E Harbor Blvd	Ventura	93001	34.2764930	-119.2934460	3
5	179	Ventura	CZ	Best Western Inn of Ventura	708 East Thompson	Ventura	93001	34.2776260	-119.2896640	3
6	180	Ventura	CZ	Marriott Ventura Beach	2055 E Harbor Blvd	Ventura	93001	34.2682320	-119.2745280	3
7	181	Ventura	CZ	Vagabond Inn Ventura	756 E Thompson Blvd	Ventura	93001	34.2776460	-119.2893680	2
8	182	Ventura	CZ	Country Inn & Suites Ventura	298 S Chestnut St	Ventura	93001	34.2774980	-119.2906610	3
9	183	Ventura	CZ	Four Points Ventura Harbor Resort	1050 Schooner Dr	Ventura	93001	34.2479430	-119.2592630	3
10	184	Ventura	CZ	Comfort Inn Ventura Beach	2094 E Harbor Blvd	Ventura	93001	34.2680110	-119.2727820	3
11	185	Ventura	CZ	Holiday Inn Express & Suites Ventura Harbor	1080 Navigator Dr	Ventura	93001	34.2463930	-119.2582590	3
Outside Coastal Zone, Inside Five-Mile Zone (3 hotels)										
1	186	Ventura	FZ	Best Western Oxnard Inn	1156 S Oxnard Blvd	Oxnard	93030	34.1884617	-119.1758428	3
2	187	Ventura	FZ	Residence Inn Oxnard River Ridge	2101 W Vineyard Ave	Oxnard	93030	34.2302260	-119.1989960	3
3	188	Ventura	FZ	Ramada Oxnard	1001 E Channel Islands Blvd	Oxnard	93033	34.1739830	-119.1665850	2

Table A14. Los Angeles County Hotel Inventory (101 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (27 hotels)										
1	189	Los Angeles	CZ	Beach House Hotel Hermosa Beach	1300 The Strand	Hermosa Beach	90254	33.8626163	-118.4019475	3
2	190	Los Angeles	CZ	Hyatt Regency Long Beach	200 S Pine Ave	Long Beach	90802	33.7635248	-118.1914638	4
3	191	Los Angeles	CZ	RI Long Beach Downtown	600 Queensway Dr	Long Beach	90802	33.7587510	-118.2013113	3
4	192	Los Angeles	CZ	Best Western Golden Sails Htl	6285 E Pacific Coast Hwy	Long Beach	90803	33.7656980	-118.1156440	2
5	193	Los Angeles	CZ	Doubletree Hotel Maya	700 Queensway Dr	Long Beach	90802	33.7571330	-118.1985300	3
6	194	Los Angeles	CZ	Hyatt The Pike Long Beach	285 Bay St	Long Beach	90802	33.7649970	-118.1946570	3
7	195	Los Angeles	CZ	The Inn at Venice Beach	327 Washington Blvd	Marina Del Rey	90292	33.9808303	-118.4641381	3
8	196	Los Angeles	CZ	Marina Del Rey Marriott	4100 Admiralty Way	Marina Del Rey	90292	33.9820510	-118.4595250	3
9	197	Los Angeles	CZ	The Ritz Carlton, Marina Del Rey	4375 Admiralty Way	Marina Del Rey	90292	33.9847217	-118.4505725	5
10	198	Los Angeles	CZ	DoubleTree Hotel MDR Marina Del Rey	13480 Maxella Ave	Marina Del Rey	90292	33.9851010	-118.4410280	3
11	199	Los Angeles	CZ	Hilton Garden Inn Marina Del Rey	4200 Admiralty Way	Marina Del Rey	90292	33.9836080	-118.4572140	3
12	200	Los Angeles	CZ	Terranea Resort	100 Terranea Way	Rancho Palos Verdes	90275	33.7384620	-118.3978690	4
13	201	Los Angeles	CZ	The Portofino Hotel and Yacht Club - A Noble House Hotel	260 Portofino Way	Redondo Beach	90277	33.8443997	-118.3966112	3
14	202	Los Angeles	CZ	Crowne Plaza Hotel Redondo Beach and Marina	300 N Harbor Dr	Redondo Beach	90277	33.8454585	-118.3928619	3
15	203	Los Angeles	CZ	Ramada Limited Redondo Beach	435 S Pacific Coast Hwy	Redondo Beach	90277	33.8353422	-118.3853403	2
16	204	Los Angeles	CZ	The Huntley Hotel	1111 2nd St	Santa Monica	90401	34.0187223	-118.5010592	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
17	205	Los Angeles	CZ	Viceroy Santa Monica	1819 Ocean Ave	Santa Monica	90401	34.0079333	-118.4907767	3
18	206	Los Angeles	CZ	Shangri-La Hotel	1301 Ocean Ave	Santa Monica	90401	34.0154272	-118.4993043	3
19	207	Los Angeles	CZ	Loews Santa Monica Beach Hotel	1700 Ocean Ave	Santa Monica	90401	34.0091184	-118.4930376	4
20	208	Los Angeles	CZ	JW Marriott Santa Monica Le Merigot	1740 Ocean Ave	Santa Monica	90401	34.0084910	-118.4924020	4
21	209	Los Angeles	CZ	Oceana Santa Monica	849 Ocean Ave	Santa Monica	90403	34.0213830	-118.5059580	3
22	210	Los Angeles	CZ	Wyndham Santa Monica Beach @ The Pier	120 Colorado Ave	Santa Monica	90401	34.0118320	-118.4941630	3
23	211	Los Angeles	CZ	Fairmont Miramar	101 Wilshire Blvd	Santa Monica	90401	34.0179160	-118.5016220	4
24	212	Los Angeles	CZ	Georgian Hotel	1415 Ocean Ave	Santa Monica	90401	34.0136710	-118.4973510	3
25	213	Los Angeles	CZ	Ocean View Hotel	1447 Ocean Ave	Santa Monica	90401	34.0131740	-118.4965600	2
26	214	Los Angeles	CZ	Shore Hotel	1515 Ocean Ave	Santa Monica	90401	34.0127100	-118.4956390	4
27	215	Los Angeles	CZ	Le Meridien Delfina Santa Monica	530 Pico Blvd	Santa Monica	90405	34.0107850	-118.4853660	4
Outside Coastal Zone, Inside Five-Mile Zone (74 hotels)										
1	216	Los Angeles	FZ	Four Points by Sheraton Los Angeles Westside	5990 Green Valley Cir	Culver City	90230	33.9838010	-118.3938540	3
2	217	Los Angeles	FZ	Travelodge Los Angeles Culver City	11180 Washington Pl	Culver City	90232	34.0089013	-118.4134370	2
3	218	Los Angeles	FZ	Doubletree by Hilton Hotel Los Angeles International Airport	1985 E Grand Ave	El Segundo	90245	33.9198460	-118.3920390	3
4	219	Los Angeles	FZ	Embassy Suites LAX South	1440 E Imperial Ave	El Segundo	90245	33.9305740	-118.4007440	3
5	220	Los Angeles	FZ	Courtyard by Marriott Los Angeles LAX El Segundo	2000 E Mariposa Ave	El Segundo	90245	33.9230480	-118.3914590	3
6	221	Los Angeles	FZ	Hilton Garden Inn LAX El Segundo	2100 E Mariposa Ave	El Segundo	90245	33.9230230	-118.3883270	3
7	222	Los Angeles	FZ	Residence Inn by Marriott El Segundo	2135 E El Segundo Blvd	El Segundo	90245	33.9166190	-118.3887580	3
8	223	Los Angeles	FZ	Extended Stay America Los Angeles LAX Airport El Segundo	1910 E Mariposa Ave	El Segundo	90245	33.9235690	-118.3946800	2
9	224	Los Angeles	FZ	Hyatt Place Los Angeles LAX El Segundo	750 N Nash St	El Segundo	90245	33.9262100	-118.3871810	3
10	225	Los Angeles	FZ	Springhill Suites by Marriott Manhattan Beach	14620 Aviation Blvd	Hawthorne	90250	33.8986850	-118.3780930	3
11	226	Los Angeles	FZ	Towneplace Suites by Marriott Los Angeles LAX/Manhattan Beach	14400 Aviation Blvd	Hawthorne	90260	33.9009600	-118.3780790	2
12	227	Los Angeles	FZ	Hampton Inn Los Angeles International Airport Hawthorne	11430 Acacia Ave	Hawthorne, CA	90250	33.9306680	-118.3506600	3
13	228	Los Angeles	FZ	Quality Inn & Suites Hermosa Beach	901 Aviation Blvd	Hermosa Beach	90254	33.8633567	-118.3911203	3
14	229	Los Angeles	FZ	Holiday Inn Express Hotel & Suites Hermosa Beach	125 Pacific Coast Hwy	Hermosa Beach	90254	33.8553203	-118.3906196	3
15	230	Los Angeles	FZ	Hampton Inn and Suites	1530 Pacific Coast Hwy	Hermosa Beach	90254	33.8658448	-118.3933275	3
16	231	Los Angeles	FZ	Wingate by Wyndham Los Angeles International Airport LAX	10300 S La Cienega Blvd	Inglewood	90304	33.9423811	-118.3699051	3
17	232	Los Angeles	FZ	Best Western South Bay Hotel	15000 Hawthorne Blvd	Lawndale	90260	33.8952471	-118.3522186	3
18	233	Los Angeles	FZ	Days Inn LAX Airport South Bay - Lawndale	15636 Hawthorne Blvd	Lawndale	90260	33.8886130	-118.3517860	2
19	234	Los Angeles	FZ	Renaissance Long Beach Hotel	111 E Ocean Blvd	Long Beach	90704	33.7593626	-118.2416893	3
20	235	Los Angeles	FZ	Holiday Inn Hotel Long Beach (Dwtn Area)	1133 Atlantic Ave	Long Beach	90704	33.7816303	-118.1851716	3
21	236	Los Angeles	FZ	Holiday Inn Hotel Long Beach-Airport (Conf Ctr)	2640 N Lakewood Blvd	Long Beach	90706	33.8034610	-118.1425580	3
22	237	Los Angeles	FZ	Comfort Inn & Suites Near Long Beach Conv Center	200 E Willow St	Long Beach	90706	33.8042468	-118.1908723	3
23	238	Los Angeles	FZ	Travelodge Long Beach Convention Center	80 Atlantic Ave	Long Beach	90802	33.7677371	-118.1850264	2
24	239	Los Angeles	FZ	Best Western of Long Beach	1725 Long Beach Blvd	Long Beach	90813	33.7887500	-118.1899050	2
25	240	Los Angeles	FZ	RI LONG BEACH	4111 E Willow St	Long Beach	90815	33.8035829	-118.1443800	3
26	241	Los Angeles	FZ	Marriott Long Beach Airport	4700 Airport Plaza Dr	Long Beach	90815	33.8115480	-118.1383780	3
27	242	Los Angeles	FZ	Extended Stay America Los Angeles - Long Beach Airport	4105 E Willow St	Long Beach	90815	33.8043260	-118.1463940	2
28	243	Los Angeles	FZ	Quality Inn Long Beach Airport	3201 E Pacific Coast Hwy	Long Beach	90755	33.7903280	-118.1543320	2
29	244	Los Angeles	FZ	Courtyard Long Beach Downtown	500 E 1st St	Long Beach	90802	33.7676010	-118.1856180	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
30	245	Los Angeles	FZ	Hotel Current	5325 Pacific Coast Hwy	Long Beach	90804	33.7814680	-118.1303120	3
31	246	Los Angeles	FZ	Holiday Inn Lax	9901 S La Cienega Blvd	Los Angeles	90045	33.9462250	-118.3711880	3
32	247	Los Angeles	FZ	Sheraton	6101 W Century Blvd	Los Angeles	90045	33.9465310	-118.3907800	3
33	248	Los Angeles	FZ	Crowne Plaza Hotel Los Angeles-Intl Airport	5985 W Century Blvd	Los Angeles	90045	33.9461664	-118.3888496	3
34	249	Los Angeles	FZ	La Quinta Inn & Suites Lax	5249 W Century Blvd	Los Angeles	90045	33.9455416	-118.3719777	3
35	250	Los Angeles	FZ	Radisson Hotel at Los Angeles Airport	6225 W Century Blvd	Los Angeles	90045	33.9458500	-118.3950740	3
36	251	Los Angeles	FZ	Four Points by Sheraton Los Angeles International Airport	9750 Airport Blvd	Los Angeles	90045	33.9476210	-118.3850643	3
37	252	Los Angeles	FZ	Embassy Suites LAX North	9801 Airport Blvd	Los Angeles	90045	33.9469520	-118.3865090	3
38	253	Los Angeles	FZ	Super8 - Los Angeles International Airport Hotel	9250 Airport Blvd	Los Angeles	90045	33.9517758	-118.3857294	2
39	254	Los Angeles	FZ	Renaissance Los Angeles Airport Hotel	9620 Airport Blvd	Los Angeles	90045	33.9491980	-118.3852390	3
40	255	Los Angeles	FZ	Courtyard by Marriott Los Angeles Century Boulevard	6161 W Century Blvd	Los Angeles	90045	33.9467100	-118.3934150	3
41	256	Los Angeles	FZ	Extended Stay America Los Angeles - LAX Airport	6531 S Sepulveda Blvd	Los Angeles	90045	33.9798020	-118.3952220	2
42	257	Los Angeles	FZ	Hotel Angeleno - A Joie De Vivre Hotel	170 N Church Ln	Los Angeles	90049	34.0736528	-118.4681940	3
43	258	Los Angeles	FZ	Best Western Royal Palace Inn	2528 S Sepulveda Blvd	Los Angeles	90064	34.0342872	-118.4333214	3
44	259	Los Angeles	FZ	Super 8 Los Angeles Culver City	12664 Washington Blvd	Los Angeles	90066	33.9968273	-118.4338681	2
45	260	Los Angeles	FZ	Rodeway Inn Culver City	11933 Washington Blvd	Los Angeles	90066	33.9979704	-118.4207488	2
46	261	Los Angeles	FZ	Luxe City Center Hotel	1020 S Figueroa St	Los Angeles	90704	33.7831215	-118.2803158	4
47	262	Los Angeles	FZ	Marriott Los Angeles Airport	5855 W Century Blvd	Los Angeles	90045	33.9466180	-118.3846890	3
48	263	Los Angeles	FZ	Hilton Los Angeles Airport	5711 W Century Blvd	Los Angeles	90045	33.9460270	-118.3816610	3
49	264	Los Angeles	FZ	Westin Los Angeles Airport	5400 W Century Blvd	Los Angeles	90045	33.9446220	-118.3741430	3
50	265	Los Angeles	FZ	Luxe Hotel Sunset Boulevard	11461 Sunset Blvd	Los Angeles	90049	34.0724580	-118.4683240	3
51	266	Los Angeles	FZ	Marriott Manhattan Beach	1400 Parkview Ave	Manhattan Beach	90266	33.9001180	-118.3882440	3
52	267	Los Angeles	FZ	Residence Inn-Lax	1700 N Sepulveda Blvd	Manhattan Beach	90266	33.8903210	-118.3958520	3
53	268	Los Angeles	FZ	Hawthorn Suites	1817 N Sepulveda Blvd	Manhattan Beach	90266	33.8920444	-118.3961056	3
54	269	Los Angeles	FZ	The Belamar Hotel	3501 N Sepulveda Blvd	Manhattan Beach	90266	33.9005810	-118.3967820	3
55	270	Los Angeles	FZ	Best Western Redondo Beach Inn	1850 S Pacific Coast Hwy	Redondo Beach	90277	33.8164670	-118.3790855	3
56	271	Los Angeles	FZ	Best Western Redondo Beach Gal	2740 Artesia Blvd	Redondo Beach	90278	33.8724200	-118.3597140	2
57	272	Los Angeles	FZ	Residence Inn Los Angeles Redondo Beach	2420 Marine Ave.	Redondo Beach, CA	90278	33.8929910	-118.3655320	3
58	273	Los Angeles	FZ	Hilton Garden Inn Los Angeles Redondo Beach	2410 Marine Ave.	Redondo Beach, CA	90278	33.8938200	-118.3665990	3
59	274	Los Angeles	FZ	Crowne Plaza Hotel Los Angeles Harbor Hotel	601 S Palos Verdes St	San Pedro	90704	33.7383010	-118.2820330	3
60	275	Los Angeles	FZ	Comfort Inn Near Santa Monica Pier	2815 Santa Monica Blvd	Santa Monica	90404	34.0351666	-118.4719971	2
61	276	Los Angeles	FZ	Best Western Gateway Hotel	1920 Santa Monica Blvd	Santa Monica	90404	34.0285234	-118.4800942	3
62	277	Los Angeles	FZ	Travelodge Santa Monica Pico Blvd	3102 Pico Blvd	Santa Monica	90405	34.0259460	-118.4571110	2
63	278	Los Angeles	FZ	Ambrose Hotel	1255 20th St	Santa Monica	91307	34.0303334	-118.4818477	3
64	279	Los Angeles	FZ	Doubletree Guest Suites Santa Monica	1707 4th St	Santa Monica	90401	34.0114610	-118.4889900	3
65	280	Los Angeles	FZ	Travelodge Torrance/Redondo Beach	2448 W Sepulveda Blvd	Torrance	90501	33.8210880	-118.3269700	2
66	281	Los Angeles	FZ	Courtyard by Marriott Torrance Palos Verdes	2633 W Sepulveda Blvd	Torrance	90501	33.8227010	-118.3314556	3
67	282	Los Angeles	FZ	Residence Inn	3701 Torrance Blvd	Torrance	90503	33.8387260	-118.3518580	3
68	283	Los Angeles	FZ	Marriott Torrance South Bay	3635 Fashion Way	Torrance	90503	33.8354160	-118.3501623	3
69	284	Los Angeles	FZ	Staybridge Suites	19901 Prairie Ave	Torrance	90503	33.8504000	-118.3460650	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
70	285	Los Angeles	FZ	Ramada Inn Torrance - South Bay	2880 Pacific Coast Hwy	Torrance	90505	33.7945960	-118.3378410	2
71	286	Los Angeles	FZ	Doubletree Torrance South Bay	21333 Hawthorne Blvd	Torrance	90503	33.8348300	-118.3542790	3
72	287	Los Angeles	FZ	Best Western Plus Avita Suites	3531 Torrance Blvd	Torrance	90503	33.8381180	-118.3480560	3
73	288	Los Angeles	FZ	Holiday Inn Express West Los Angeles	11250 Santa Monica Blvd	West Los Angeles	90025	34.0465740	-118.4473380	3
74	289	Los Angeles	FZ	BEST WESTERN Los Angeles Worldport Hotel	1402 W Pacific Coast Hwy	Wilmington	90803	33.7905820	-118.2830280	2

Table A15. Orange County Hotel Inventory (42 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (26 hotels)										
1	290	Orange	CZ	Ritz Carlton Laguna Niguel	1 Ritz Carlton Dr	Dana Point	92629	33.4765740	-117.7184310	5
2	291	Orange	CZ	Laguna Cliffs Resort	25135 Park Lantern	Dana Point	92629	33.4644157	-117.6914521	4
3	292	Orange	CZ	Best Western Plus Dana Point Inn By The Sea	34744 Coast Hwy	Dana Point	92624	33.4577300	-117.6705530	3
4	293	Orange	CZ	Doubletree Doheny Beach	34402 Pacific Coast Hwy	Dana Point	92629	33.4638270	-117.6816590	3
5	294	Orange	CZ	Best Western Plus Marina Shores Hotel	34280 Pacific Coast Hwy	Dana Point	92629	33.4658350	-117.6894270	3
6	295	Orange	CZ	St Regis Monarch Beach	1 Monarch Beach Resort N	Dana Point	92629	33.4822260	-117.7151730	5
7	296	Orange	CZ	BEST WESTERN Huntington Beach Inn	800 Pacific Coast Hwy	Huntington Beach	92648	33.6597944	-118.0052465	2
8	297	Orange	CZ	Hilton Waterfront Beach Resort	21100 Pacific Coast Hwy	Huntington Beach	92648	33.6532930	-117.9944030	4
9	298	Orange	CZ	Hyatt Regency Huntington Beach & Spa	21500 Pacific Coast Hwy	Huntington Beach	92648	33.6508470	-117.9903820	4
10	299	Orange	CZ	Best Western Laguna Brisas Spa	1600 S Coast Hwy	Laguna Beach	92651	33.5299868	-117.7724622	3
11	300	Orange	CZ	Surf and Sand Resort	1555 S Coast Hwy	Laguna Beach	92651	33.5303591	-117.7731664	4
12	301	Orange	CZ	Laguna Cliffs Inn	475 N Coast Hwy	Laguna Beach	92651	33.5448478	-117.7914419	3
13	302	Orange	CZ	Holiday Inn Laguna Beach	696 S Coast Hwy	Laguna Beach	92651	33.5380330	-117.7794000	3
14	303	Orange	CZ	Montage Laguna Beach	30801 S Coast Hwy	Laguna Beach	92651	33.5151530	-117.7570210	5
15	304	Orange	CZ	Hyatt Regency Newport Beach	1107 Jamboree Rd	Newport Beach	92660	33.6167331	-117.8879333	3
16	305	Orange	CZ	Newport Beach Marriott Bayview	500 Bayview Cir	Newport Beach	92660	33.6536018	-117.8681731	3
17	306	Orange	CZ	Newport Channel Inn	6030 West Coast Hwy	Newport Beach	92663	33.6258907	-117.9480626	2
18	307	Orange	CZ	Best Western Newport Beach Inn	6208 West Coast Hwy	Newport Beach	92663	33.6266580	-117.9493150	3
19	308	Orange	CZ	The Balboa Bay Club and Resort	1221 West Coast Hwy	Newport Beach	92663	33.6154726	-117.9143447	4
20	309	Orange	CZ	Bay Shores Peninsula Hotel	1800 W Balboa Blvd	Newport Beach	92663	33.6078950	-117.9251630	3
21	310	Orange	CZ	Pelican Hill Resort	22701 Pelican Hill Rd S	Newport Coast	92648	33.5868370	-117.8430420	5
22	311	Orange	CZ	Best Western Casablanca Inn	1601 N El Camino Real	San Clemente	92672	33.4328790	-117.6281340	2
23	312	Orange	CZ	Rodeway Inn San Clemente Beach	1301 N El Camino Real	San Clemente	92672	33.4322310	-117.6228010	2
24	313	Orange	CZ	Pacific Inn	600 Marina Dr	Seal Beach	90740	33.7449834	-118.1058175	3
25	314	Orange	CZ	Hampton Inn and Suites	2401 Seal Beach Blvd	Seal Beach	90740	33.7589180	-118.0814560	3
26	315	Orange	CZ	Best Western Harbour Inn & Suites	16912 Pacific Coast Hwy	Sunset Beach	90742	33.7164460	-118.0681290	3
Outside Coastal Zone, Inside Five-Mile Zone (16 hotels)										
1	316	Orange	FZ	Super 8 Costa Mesa Newport Beach	2645 Harbor Blvd	Costa Mesa	92626	33.6692910	-117.9201000	2
2	317	Orange	FZ	Best Western Newport Mesa Inn	2642 Newport Blvd	Costa Mesa	92627	33.6636840	-117.8954220	3
3	318	Orange	FZ	Travelodge Costa Mesa Newport Beach	1951 Costa Mesa Fwy	Costa Mesa	92627	33.6557417	-117.9050645	2
4	319	Orange	FZ	Ramada Inn and Suites Costa Mesa/Newport Beach	1680 Superior Ave	Costa Mesa	92627	33.6356133	-117.9240199	3
5	320	Orange	FZ	Holiday Inn Express Hotel & Suites Costa Mesa	2070 Costa Mesa Fwy	Costa Mesa	92627	33.6477301	-117.9124861	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
6	321	Orange	FZ	BLVD Hotel	2430 Newport Blvd	Costa Mesa	92627	33.6577080	-117.9015190	3
7	322	Orange	FZ	Best Western Regency Inn	19360 Beach Blvd	Huntington Beach	92646	33.6812045	-117.9885597	3
8	323	Orange	FZ	Howard Johnson Huntington Beach	17251 Beach Blvd	Huntington Beach	92647	33.7118820	-117.9894330	2
9	324	Orange	FZ	Comfort Suites Huntington Beach	16301 Beach Blvd	Huntington Beach	92647	33.7258490	-117.9894660	2
10	325	Orange	FZ	The Island Hotel	690 Newport Center Dr	Newport Beach	92660	33.6193350	-117.8756692	5
11	326	Orange	FZ	Holiday Inn Express San Clemente	35 Via Pico Plaza	San Clemente	92672	33.4353990	-117.6189420	3
12	327	Orange	FZ	Hampton Inn and Suites	2481 S El Camino Real	San Clemente	92672	33.4102600	-117.5998930	3
13	328	Orange	FZ	San Clemente Beach Travelodge	2441 S El Camino Real	San Clemente	92672	33.4108708	-117.6002653	2
14	329	Orange	FZ	Best Western Capistrano Inn	27174 Ortega Hwy	San Juan Capistrano	92675	33.5019800	-117.6564860	3
15	330	Orange	FZ	Residence Inn Dana Point San Juan Capistrano	33711 Camino Capistrano	San Juan Capistrano	92675	33.4732370	-117.6765260	3
16	331	Orange	FZ	Best Western Westminster Inn	5755 Westminster Blvd	Westminster	92683	33.7591023	-118.0286926	2

Table A16. San Diego County Hotel Inventory (140 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (73 hotels)										
1	332	San Diego	CZ	Holiday Inn Express Encinitas Cardiff Beach Area	1661 Villa Cardiff Dr	Cardiff By The Sea	92007	33.0275990	-117.2739410	3
2	333	San Diego	CZ	Best Western Beach View Lodge	3180 Carlsbad Blvd	Carlsbad	92008	33.1557680	-117.3503540	3
3	334	San Diego	CZ	Carlsbad by the Sea Resort	850 Palomar Airport Rd	Carlsbad	92008	33.1222492	-117.3197066	3
4	335	San Diego	CZ	Grand Pacific Palsades Resort	5805 Armada Dr	Carlsbad	92008	33.1252099	-117.3147141	3
5	336	San Diego	CZ	West Inn and Suites	4970 Avenida Encinas	Carlsbad	92008	33.1353100	-117.3312700	3
6	337	San Diego	CZ	La Quinta Inn Carlsbad	760 Macadamia Dr	Carlsbad	92011	33.1061752	-117.3142168	2
7	338	San Diego	CZ	Hilton Garden Inn Carlsbad Beach	6450 Carlsbad Blvd	Carlsbad	92011	33.1214474	-117.3260457	4
8	339	San Diego	CZ	Beach Terrace Inn	2775 Ocean St	Carlsbad	92008	33.1592030	-117.3542880	3
9	340	San Diego	CZ	Carlsbad Inn Beach Resort	3075 Carlsbad Blvd	Carlsbad	92008	33.1571830	-117.3514020	3
10	341	San Diego	CZ	Tamarack Beach Resort	3200 Carlsbad Blvd	Carlsbad	92008	33.1546340	-117.3502530	3
11	342	San Diego	CZ	Courtyard San Diego Carlsbad	5835 Owens Ave	Carlsbad	92008	33.1223230	-117.2812390	3
12	343	San Diego	CZ	Hyatt House San Diego Carlsbad	5010 Avenida Encinas	Carlsbad	92008	33.1332730	-117.3299910	3
13	344	San Diego	CZ	Ramada Carlsbad	751 Macadamia Dr	Carlsbad	92011	33.1057550	-117.3133970	2
14	345	San Diego	CZ	Park Hyatt Aviara Resort	7100 Aviara Resort Dr	Carlsbad	92011	33.0993130	-117.2855270	5
15	346	San Diego	CZ	Hilton Carlsbad Oceanfront Resort & Spa	1 Ponto Rd	Carlsbad	92011	33.0982510	-117.3160480	4
16	347	San Diego	CZ	Loews Coronado Bay Resort	4000 Coronado Bay Rd	Coronado	92118	32.6318260	-117.1341940	4
17	348	San Diego	CZ	Glorietta Bay Inn	1630 Glorietta Blvd	Coronado	92118	32.6817690	-117.1764380	3
18	349	San Diego	CZ	Hotel Del Coronado	1500 Orange Ave	Coronado	92118	32.6809290	-117.1784430	4
19	350	San Diego	CZ	Marriott Coronado Island Resort & Spa	2000 2nd St	Coronado	92118	32.6948240	-117.1659900	3
20	351	San Diego	CZ	Best Western Plus Suites Hotel Coronado Island	275 Orange Ave	Coronado	92118	32.6959450	-117.1734260	2
21	352	San Diego	CZ	Clarion Del Mar Inn	720 Camino Del Mar	Del Mar	92014	32.9513480	-117.2627540	3
22	353	San Diego	CZ	L' Auberge Del Mar Resort	1540 Camino Del Mar	Del Mar	92014	32.9601210	-117.2659590	4
23	354	San Diego	CZ	Hotel Indigo San Diego Del Mar	710 Camino Del Mar	Del Mar	92014	32.9502790	-117.2623950	3
24	355	San Diego	CZ	Hilton San Diego Del Mar	15575 Jimmy Durante Blvd	Del Mar	92014	32.9781400	-117.2550580	3
25	356	San Diego	CZ	Howard Johnson San Diego Encinitas	607 Leucadia Blvd	Encinitas	92024	33.0648676	-117.2911634	2
26	357	San Diego	CZ	Best Western Encinitas Inn & Suites At M	85 Encinitas Blvd	Encinitas	92024	33.0486209	-117.2904529	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
27	358	San Diego	CZ	Econo Lodge Encinitas Moonlight Beach	410 N Coast Highway 101	Encinitas	92024	33.0567290	-117.2989560	2
28	359	San Diego	CZ	Rodeway Inn North Encinitas	1444 N Coast Highway 101	Encinitas	92024	33.0728480	-117.3052080	2
29	360	San Diego	CZ	Days Inn Encinitas Lego Land Moonlight	133 Encinitas Blvd	Encinitas	92024	33.0478610	-117.2894460	2
30	361	San Diego	CZ	Best Western Inn by the Sea	7830 Fay Avenue	La Jolla	92037	32.8455490	-117.2758260	3
31	362	San Diego	CZ	Hilton La Jolla Torrey Pines	10950 N Torrey Pines Rd	La Jolla	92037	32.9015358	-117.2437714	3
32	363	San Diego	CZ	Travelodge San Diego La Jolla Beach	6750 La Jolla Blvd	La Jolla	92037	32.8302010	-117.2776200	2
33	364	San Diego	CZ	Holiday Inn Express La Jolla	6705 La Jolla Blvd	La Jolla	92037	32.8296780	-117.2767860	3
34	365	San Diego	CZ	La Jolla Shores Hotel	8110 Camino Del Oro	La Jolla	92037	32.8549130	-117.2579440	3
35	366	San Diego	CZ	Grande Colonial	910 Prospect St	La Jolla	92037	32.8472560	-117.2755360	4
36	367	San Diego	CZ	Kimpton Hotel La Jolla	7955 La Jolla Shores Dr	La Jolla	92037	32.8513470	-117.2532780	3
37	368	San Diego	CZ	The Lodge @ Torrey Pines	11480 N Torrey Pines Rd	La Jolla	92037	32.9042990	-117.2445250	5
38	369	San Diego	CZ	Preferred La Valencia Hotel	1132 Prospect St	La Jolla	92037	32.8485800	-117.2737130	4
39	370	San Diego	CZ	Estancia La Jolla Hotel & Spa	9700 N Torrey Pines Rd	La Jolla	92037	32.8837270	-117.2444420	4
40	371	San Diego	CZ	Scripps Inn	555 Coast Blvd S	La Jolla	92037	32.8439400	-117.2788940	3
41	372	San Diego	CZ	Best Western Plus Marina Gateway Hotel	800 Bay Marina Dr	National City	91950	32.6588600	-117.1097480	3
42	373	San Diego	CZ	Days Inn Oceanside	1501 Carmelo Dr	Oceanside	92054	33.2078110	-117.3886390	2
43	374	San Diego	CZ	La Quinta Inns & Suites Oceanside	937 N Coast Hwy	Oceanside	92054	33.2026600	-117.3845710	2
44	375	San Diego	CZ	Holiday Inn & Suites Oceanside Camp Pendleton Area	1401 Carmelo Dr	Oceanside	92054	33.2074980	-117.3879000	3
45	376	San Diego	CZ	Springhill Suites San Diego Oceanside Downtown	110 North Myers St.	Oceanside , CA	92054	33.1939530	-117.3816740	3
46	377	San Diego	CZ	Best Western Posada at the Yac	5005 N Harbor Dr	San Diego	92106	32.7259147	-117.2260532	2
47	378	San Diego	CZ	Best Western Island Palms Htl	2051 Shelter Island Dr	San Diego	92106	32.7135551	-117.2269768	3
48	379	San Diego	CZ	Humphrey's Half Moon Inn	2303 Shelter Island Dr	San Diego	92106	32.7186180	-117.2245720	3
49	380	San Diego	CZ	Hilton San Diego Resort	1775 E Mission Bay Dr	San Diego	92109	32.7789080	-117.2097770	3
50	381	San Diego	CZ	Wyndham San Diego Bayside	1355 N Harbor Dr	San Diego	92101	32.7192730	-117.1724580	3
51	382	San Diego	CZ	Sheraton Hotel & Marina San Diego	1380 Harbor Island Dr	San Diego	92101	32.7272520	-117.1978950	3
52	383	San Diego	CZ	Marriott San Diego Marquis & Marina	333 W Harbor Dr	San Diego	92101	32.7084220	-117.1651950	4
53	384	San Diego	CZ	Grand Hyatt Manchester San Diego	1 Market Pl	San Diego	92101	32.7102430	-117.1681700	4
54	385	San Diego	CZ	Embassy Suites San Diego Bay Downtown	601 Pacific Hwy	San Diego	92101	32.7120020	-117.1705590	3
55	386	San Diego	CZ	Residence Inn San Diego Downtown	1747 Pacific Hwy	San Diego	92101	32.7233240	-117.1708590	3
56	387	San Diego	CZ	Hampton Inn San Diego Downtown	1531 Pacific Hwy	San Diego	92101	32.7213340	-117.1707270	3
57	388	San Diego	CZ	Hilton San Diego Bayfront	1 Park Blvd	San Diego	92101	32.7032540	-117.1586210	4
58	389	San Diego	CZ	Comfort Inn San Diego @ The Harbor	5102 N Harbor Dr	San Diego	92106	32.7256190	-117.2275640	2
59	390	San Diego	CZ	Holiday Inn San Diego Bayside	4875 N Harbor Dr	San Diego	92106	32.7260750	-117.2225450	3
60	391	San Diego	CZ	Ramada San Diego Airport	1403 Rosecrans St	San Diego	92106	32.7249760	-117.2284650	2
61	392	San Diego	CZ	Kona Kai Resort & Spa	1551 Shelter Island Dr	San Diego	92106	32.7095620	-117.2317810	3
62	393	San Diego	CZ	Homewood Suites San Diego Airport Liberty Station	2576 Laning Rd	San Diego	92106	32.7292200	-117.2160880	3
63	394	San Diego	CZ	Courtyard San Diego Airport Liberty Station	2592 Laning Rd	San Diego	92106	32.7307470	-117.2157310	3
64	395	San Diego	CZ	Hyatt Regency Mission Bay	1441 Quivira Rd	San Diego	92109	32.7654640	-117.2396420	4
65	396	San Diego	CZ	Catamaran Resort Hotel	3999 Mission Blvd	San Diego	92109	32.7895320	-117.2527360	3
66	397	San Diego	CZ	The Dana On Mission Bay	1710 W Mission Bay Dr	San Diego	92109	32.7657690	-117.2371450	3
67	398	San Diego	CZ	Holiday Inn Express San Diego Sea World Beach Area	4540 Mission Bay Dr	San Diego	92109	32.8029530	-117.2172190	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
68	399	San Diego	CZ	Red Roof Inn San Diego Pacific Beach Sea World Area	4545 Mission Bay Dr	San Diego	92109	32.8037610	-117.2168780	2
69	400	San Diego	CZ	Doubletree San Diego Del Mar	11915 El Camino Real	San Diego	92130	32.9358650	-117.2362660	3
70	401	San Diego	CZ	Hampton Inn San Diego Del Mar	11920 El Camino Real	San Diego	92130	32.9349860	-117.2382900	3
71	402	San Diego	CZ	Marriott San Diego Del Mar	11966 El Camino Real	San Diego	92130	32.9358190	-117.2388810	3
72	403	San Diego	CZ	Courtyard San Diego Solana Beach Del Mar	717 S Hwy 101	Solana Beach	92075	32.9829430	-117.2700310	3
73	404	San Diego	CZ	Holiday Inn Express & Suites Solana Beach Del Mar	621 S Hwy 101	Solana Beach	92075	32.9839690	-117.2706490	3
Outside Coastal Zone, Inside Five-Mile Zone (67 hotels)										
1	405	San Diego	FZ	Econo Lodge Inn & Suites Near Legoland Carlsbad	3666 Pio Pico Dr	Carlsbad	92008	33.1557950	-117.3375510	2
2	406	San Diego	FZ	Rodeway Inn Near Legoland Carlsbad	3570 Pio Pico Dr	Carlsbad	92008	33.1573860	-117.3384950	2
3	407	San Diego	FZ	Hampton Inn	2229 Palomar Airport Rd	Carlsbad	92011	33.1259157	-117.2735142	3
4	408	San Diego	FZ	Homewood Suites-Carlsbad	2223 Palomar Airport Rd	Carlsbad	92011	33.1258634	-117.2745261	3
5	409	San Diego	FZ	Best Western Chula Vista Inn	946 Broadway	Chula Vista	91911	32.6158865	-117.0838403	2
6	410	San Diego	FZ	Best Western South Bay Inn	710 E St	Chula Vista	91910	32.6398520	-117.0981430	2
7	411	San Diego	FZ	Holiday Inn Express San Diego South Chula Vista	632 E St	Chula Vista	91910	32.6405250	-117.0949460	3
8	412	San Diego	FZ	Marriott San Diego La Jolla	4240 La Jolla Village Dr	La Jolla	92037	32.8730640	-117.2157230	3
9	413	San Diego	FZ	Sheraton Hotel La Jolla	3299 Holiday Ct	La Jolla	92037	32.8704260	-117.2314790	3
10	414	San Diego	FZ	Residence Inn San Diego La Jolla	8901 Gilman Dr	La Jolla	92037	32.8705010	-117.2371290	3
11	415	San Diego	FZ	Clarion Hotel National City San Diego South	700 National City Blvd	National City	91950	32.6761190	-117.1078410	3
12	416	San Diego	FZ	Best Western Oceanside Inn	1680 Oceanside Blvd	Oceanside	92054	33.1898700	-117.3643730	2
13	417	San Diego	FZ	Quality Inn & Suites I-5 Near Camp Pendleton Oceanside	1403 Mission Ave	Oceanside	92058	33.2008416	-117.3703539	2
14	418	San Diego	FZ	Residence Inn San Diego Oceanside	3603 Ocean Ranch Blvd	Oceanside	92056	33.2088590	-117.3109850	3
15	419	San Diego	FZ	Courtyard San Diego Oceanside	3501 Seagate Way	Oceanside	92056	33.2066160	-117.3108730	3
16	420	San Diego	FZ	Super 8 Oceanside	3240 Mission Ave	Oceanside	92058	33.2150000	-117.3466630	2
17	421	San Diego	FZ	Morgan Run Resort	5690 Cancha De Golf	Rancho Santa Fe	92091	32.9909480	-117.2103560	3
18	422	San Diego	FZ	Best Western Bayside Inn	555 W Ash St	San Diego	92101	32.7196100	-117.1678350	3
19	423	San Diego	FZ	Best Western Cabrillo Garden Inn	840 W A St	San Diego	92101	32.7189212	-117.1567702	2
20	424	San Diego	FZ	Westgate Hotel	1055 2nd Ave	San Diego	92101	32.7162920	-117.1627350	4
21	425	San Diego	FZ	Porto Vista Hotel & Suites	1835 Columbia St	San Diego	92101	32.7243910	-117.1672580	3
22	426	San Diego	FZ	W San Diego	421 W B St	San Diego	92103	32.7176260	-117.1667460	3
23	427	San Diego	FZ	Best Western Mission Bay	2575 Clairemont Dr	San Diego	92110	32.7904272	-117.2038016	2
24	428	San Diego	FZ	Best Western Hacienda Suites O	4041 Harney St	San Diego	92110	32.7528500	-117.1931890	3
25	429	San Diego	FZ	Four Points San Diego Downtown	1617 1st Ave	San Diego	92101	32.7224000	-117.1634170	3
26	430	San Diego	FZ	Hilton San Diego Airport Harbor Island	1960 Harbor Island Dr	San Diego	92101	32.7251990	-117.2090960	3
27	431	San Diego	FZ	Bristol Hotel	1055 First Ave	San Diego	92101	32.7164190	-117.1635170	3
28	432	San Diego	FZ	Westin San Diego	400 W Broadway	San Diego	92101	32.7161730	-117.1669940	4
29	433	San Diego	FZ	Holiday Inn Express San Diego Downtown	1430 7th Ave	San Diego	92101	32.7204350	-117.1586050	3
30	434	San Diego	FZ	Luxury Collection The US Grant San Diego	326 Broadway	San Diego	92101	32.7159930	-117.1615290	4
31	435	San Diego	FZ	Marriott San Diego Gaslamp Quarter	530 Broadway	San Diego	92101	32.7159950	-117.1595540	4
32	436	San Diego	FZ	Westin San Diego Gaslamp Quarter	910 Broadway Cir	San Diego	92101	32.7144150	-117.1631190	4
33	437	San Diego	FZ	Comfort Inn Gaslamp San Diego	660 G St	San Diego	92101	32.7126820	-117.1584850	2
34	438	San Diego	FZ	Doubletree San Diego Downtown	1646 Front St	San Diego	92101	32.7223930	-117.1652230	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
35	439	San Diego	FZ	The Declan Suites San Diego	701 A St	San Diego	92101	32.7186460	-117.1579210	3
36	440	San Diego	FZ	Courtyard San Diego Downtown	530 Broadway	San Diego	92101	32.7159060	-117.1593330	3
37	441	San Diego	FZ	Hilton San Diego Gaslamp Quarter	401 K St	San Diego	92101	32.7079950	-117.1607830	3
38	442	San Diego	FZ	Omni San Diego Hotel	675 L St	San Diego	92101	32.7071370	-117.1588540	4
39	443	San Diego	FZ	Americas Best Value Inn San Diego Downtown	1840 4th Ave	San Diego	92101	32.7247990	-117.1614490	2
40	444	San Diego	FZ	Andaz San Diego	600 F St	San Diego	92101	32.7137200	-117.1587190	4
41	445	San Diego	FZ	Hard Rock Hotel San Diego	207 5th Ave	San Diego	92101	32.7074750	-117.1597510	4
42	446	San Diego	FZ	Residence Inn San Diego Downtown Gaslamp Quarter	356 6th Ave	San Diego	92101	32.7090150	-117.1594440	3
43	447	San Diego	FZ	Hotel Indigo San Diego Gaslamp Quarter	509 9th Ave	San Diego	92101	32.7107210	-117.1561910	3
44	448	San Diego	FZ	Howard Johnson Hotel San Diego Zoo Sea World	3330 Rosecrans St	San Diego	92108	32.7482890	-117.2080630	3
45	449	San Diego	FZ	Paradise Point Resort	1404 Vacation Rd	San Diego	92109	32.7751340	-117.2387880	4
46	450	San Diego	FZ	La Quinta Inns & Suites San Diego Mission Bay	4610 De Soto St	San Diego	92109	32.8072480	-117.2181180	3
47	451	San Diego	FZ	Wyndham Garden Hotel San Diego Near Sea World	3737 Sports Arena Blvd	San Diego	92110	32.7539840	-117.2154110	3
48	452	San Diego	FZ	La Quinta Inns & Suites San Diego Old Town Airport	2380 Moore St	San Diego	92110	32.7493720	-117.1947250	3
49	453	San Diego	FZ	Old Town Inn	4444 Pacific Hwy	San Diego	92110	32.7518880	-117.2007140	2
50	454	San Diego	FZ	Holiday Inn Express San Diego Sea World Area	3950 Jupiter St	San Diego	92110	32.7560710	-117.2200840	3
51	455	San Diego	FZ	Courtyard San Diego Old Town	2435 Jefferson St	San Diego	92110	32.7500040	-117.1952370	3
52	456	San Diego	FZ	Holiday Inn Express San Diego Airport Old Town	1955 San Diego Ave	San Diego	92110	32.7452510	-117.1869000	3
53	457	San Diego	FZ	Fairfield Inn & Suites San Diego Old Town	3900 Old Town Ave	San Diego	92110	32.7491900	-117.1926280	3
54	458	San Diego	FZ	Quality Inn I 5 Naval Base San Diego	3878 Daibergeria Ct	San Diego	92113	32.6833140	-117.1108640	2
55	459	San Diego	FZ	Courtyard San Diego Sorrento Mesa	9650 Scranton Rd	San Diego	92121	32.8954780	-117.2035430	3
56	460	San Diego	FZ	Country Inn & Suites San Diego North	5975 Lusk Blvd	San Diego	92121	32.8980540	-117.1926550	3
57	461	San Diego	FZ	Residence Inn San Diego Sorrento Mesa Sorrento Valley	5995 Pacific Mesa Ct	San Diego	92121	32.9016360	-117.1882670	3
58	462	San Diego	FZ	Hyatt House San Diego Sorrento Mesa	10044 Pacific Mesa Blvd	San Diego	92121	32.8994670	-117.1919540	3
59	463	San Diego	FZ	Holiday Inn Express & Suites San Diego Sorrento	5925 Lusk Blvd	San Diego	92121	32.8970720	-117.1935110	3
60	464	San Diego	FZ	Embassy Suites San Diego La Jolla	4550 La Jolla Village Dr	San Diego	92122	32.8744580	-117.2083930	3
61	465	San Diego	FZ	Hyatt Regency La Jolla @ Aventine	3777 La Jolla Village Dr	San Diego	92122	32.8707760	-117.2254250	4
62	466	San Diego	FZ	Homewood Suites San Diego Del Mar	11025 Vista Sorrento Pkwy	San Diego	92130	32.9164860	-117.2290860	3
63	467	San Diego	FZ	Preferred The Grand Del Mar	5300 Grand Del Mar Ct	San Diego	92130	32.9383840	-117.1976900	5
64	468	San Diego	FZ	Hilton Garden Inn San Diego Del Mar	3939 Ocean Bluff Ave	San Diego	92130	32.9171410	-117.2286310	3
65	469	San Diego	FZ	Hampton Inn San Diego Mission Valley	2151 Hotel Cir S	San Diego	92108	32.7582590	-117.1821060	3
66	470	San Diego	FZ	Holiday Inn Express & Suites San Diego Hotel Circle	635 Hotel Cir S	San Diego	92108	32.7598890	-117.1694660	3
67	471	San Diego	FZ	Quality Inn & Suites Near The Border San Ysidro	930 W San Ysidro Blvd	San Ysidro	92173	32.5594000	-117.0632300	2

A3. Hotel Maps

Figures A1 through A4 show maps of Coastal Zone and Five-Mile Zone hotels in the California coastal counties. The maps are organized by region:

- **Northern California:** Del Norte County, Humboldt County, and Mendocino County.
- **Bay Area California:** Sonoma County, Marin County, San Francisco County, San Mateo County, and Santa Cruz County.
- **Central Coast California:** Monterey County, San Luis Obispo County, Santa Barbara County, and Ventura County.
- **Southern California:** Los Angeles County, Orange County, and San Diego County.

The hotels presented in these maps include all AAA-rated and non-AAA-rated hotels. The maps do not include new hotels added from the September 24, 2015 STR participation list of new hotels participating in STR surveys since January 1, 2014. The mapping process for the new hotels is explained in Chapter 5 and a listing of these hotels is provided in Appendix D.

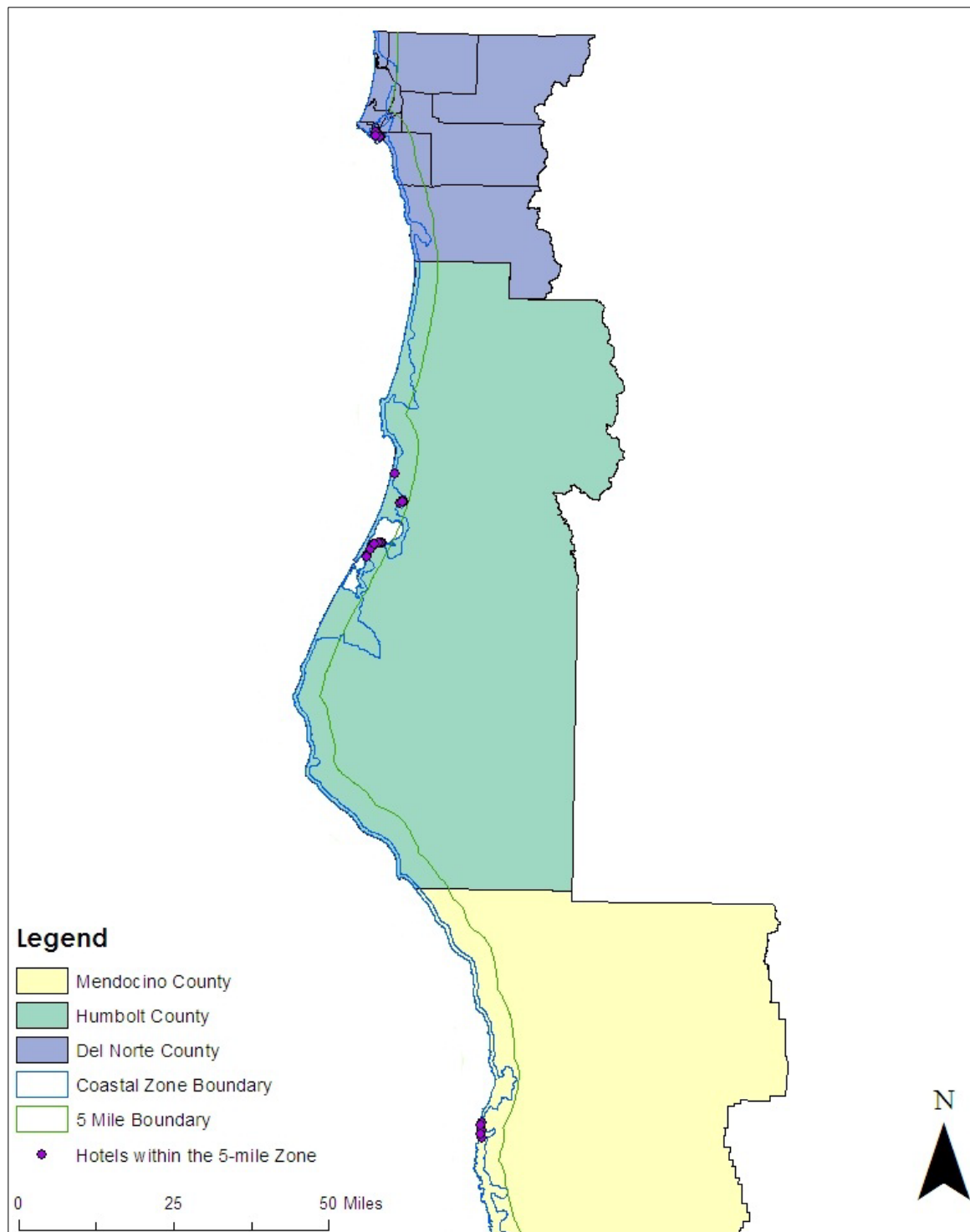


Figure A1. Northern California Counties Hotel Map

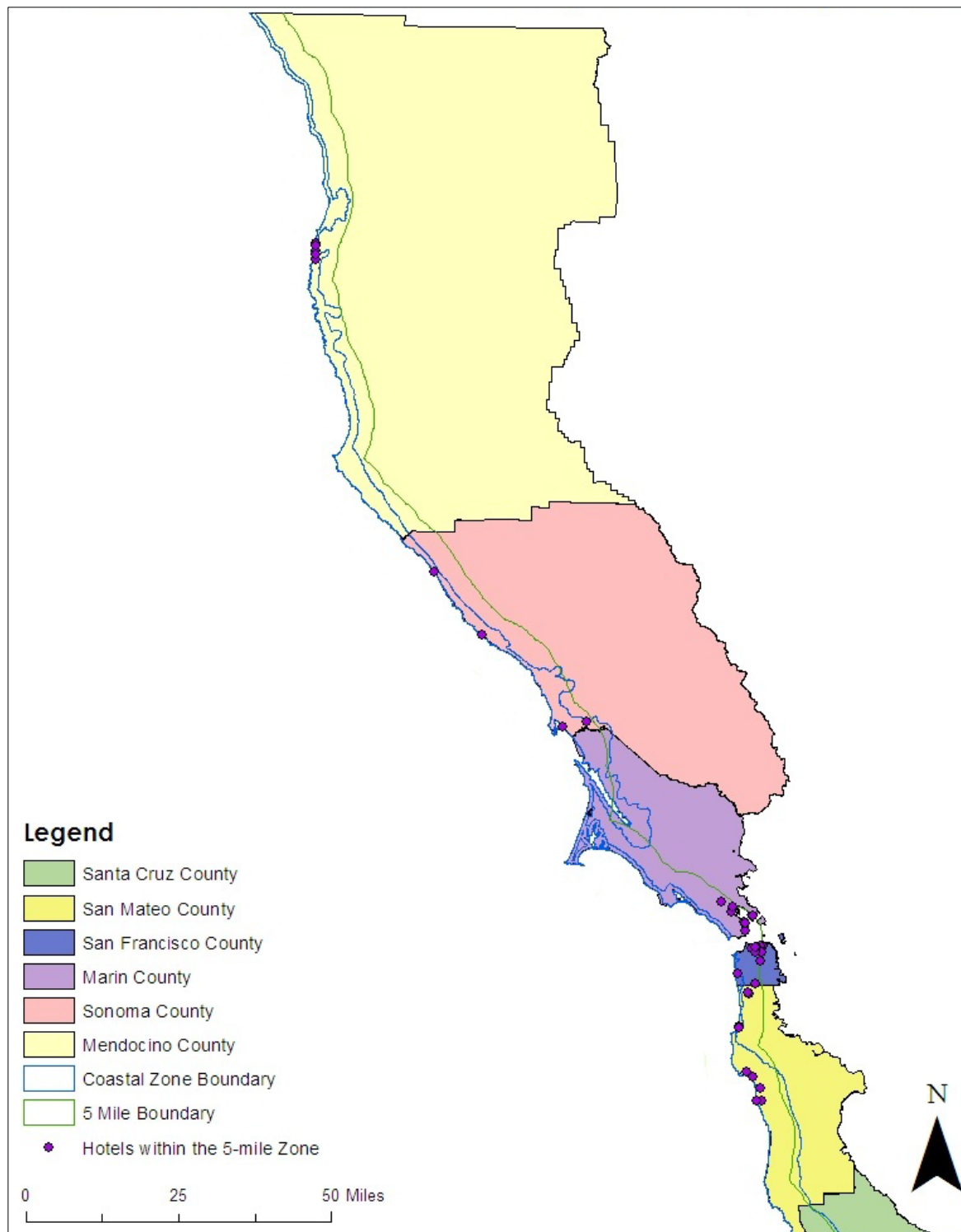


Figure A2. Bay Area California Counties Hotel Map

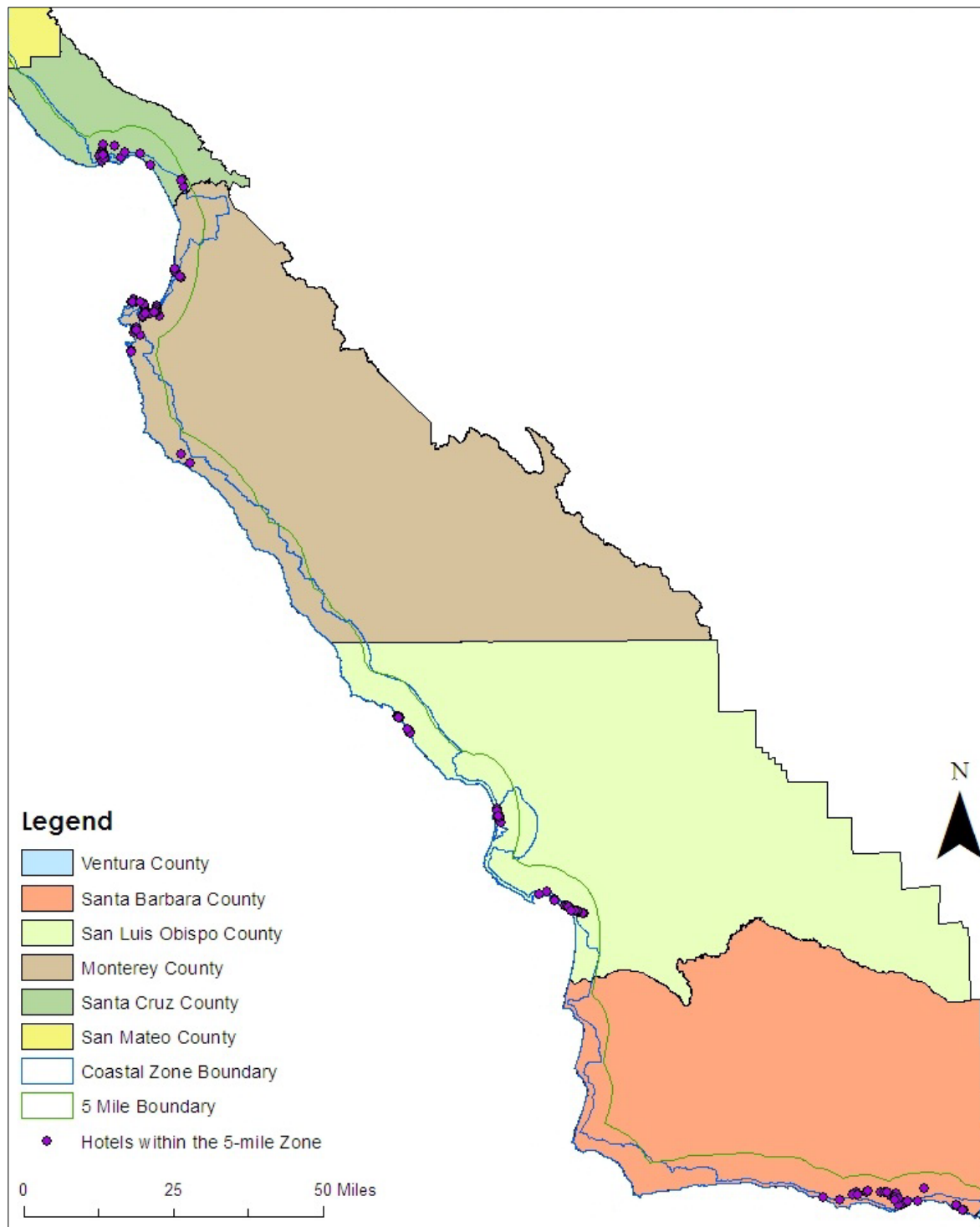


Figure A3. Central Coast Counties California Hotel Map

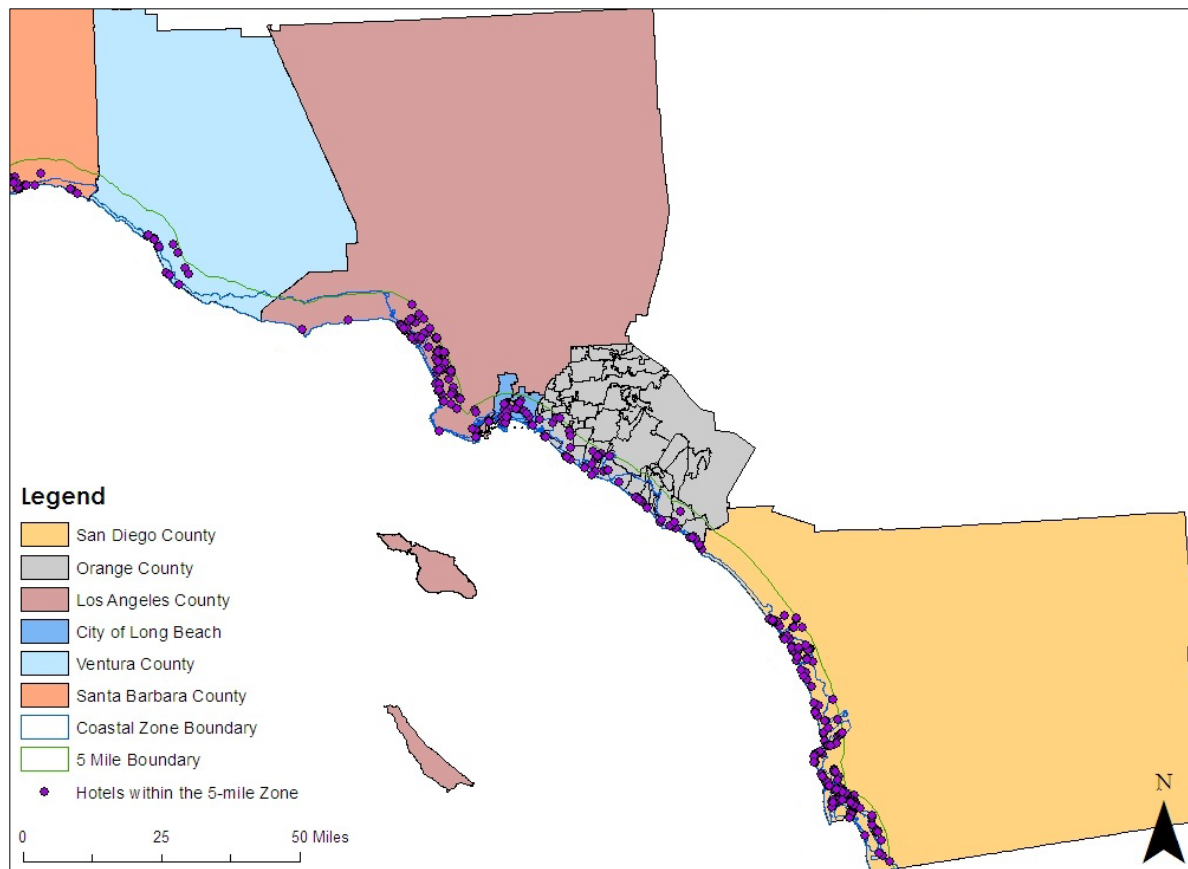


Figure A4. Southern California Counties Hotel Map

Appendix B. CCC Local Inventory Analysis: Hotel Inventories and Maps

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B1. Introduction

Appendix B presents the hotel inventories and maps for the CCC local cost analysis performed in Chapter 5. The eight inventories studied for this analysis are shown in Table B1.

Table B1. Inventories for CCC Local Cost Analysis

Political	Distance From Coast	Hotel Count
City of Long Beach	Coastal Zone	5
City of Long Beach	Five-Mile Zone	17
Los Angeles County	Coastal Zone	27
Los Angeles County	Five-Mile Zone	101
Orange County	Coastal Zone	26
Orange County	Five-Mile Zone	42
Los Angeles County and Orange County	Coastal Zone	53
Los Angeles County and Orange County	Five-Mile Zone	143

As explained in Chapter 5, the hotels in these inventories participate STR surveys, are located in the Coastal Zone or Five-Mile Zone, and are AAA-rated.

As explained in Appendix A, the 471 hotels California Coastal Counties – Five Mile Zone, part of the California coastal premium analysis, also serve as the master list for unique hotels used for data analysis. Accordingly, all of these hotels in the CCC local costs analysis inventories also appear in the California coastal premium analysis inventories presented in Appendix A. For cross-references purposes, each hotel is assigned a unique identification number (ID) from 000 to 471.

B2. Hotel Inventories

Tables B2 through B5 list the hotels for the CCC local cost analysis inventories. To avoid redundancy in presentation, each hotel is listed only once per table. Each table includes the AAA-rated hotels in the respective county's Five-Mile Zone. The hotels in each table are divided into two groups:

- Hotels in the Coastal Zone, and
- Hotels outside the Coastal Zone, but inside the Five-Mile Zone.

The Coastal Zone inventory consists only of the hotels listed in the first group. The Five-Mile Zone inventory consists of hotels listed in both groups.

Each table is ordered by zone (the two groups described above, city, then zip code). The ID is the hotel's unique number from unique 000 to 471. The list number (No.) is the hotel's position on the list under the group heading to the table, but not across all inventories.

Table B2. City of Long Beach Hotel Inventory (17 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (5 hotels)										
1	190	Los Angeles	CZ	Hyatt Regency Long Beach	200 S Pine Ave	Long Beach	90802	33.7635248	-118.1914638	4
2	191	Los Angeles	CZ	RI Long Beach Downtown	600 Queensway Dr	Long Beach	90802	33.7587510	-118.2013113	3
3	192	Los Angeles	CZ	Best Western Golden Sails Htl	6285 E Pacific Coast Hwy	Long Beach	90803	33.7656980	-118.1156440	2
4	193	Los Angeles	CZ	Doubletree Hotel Maya	700 Queensway Dr	Long Beach	90802	33.7571330	-118.1985300	3
5	194	Los Angeles	CZ	Hyatt The Pike Long Beach	285 Bay St	Long Beach	90802	33.7649970	-118.1946570	3
Outside Coastal Zone, Inside Five-Mile Zone (12 hotels)										
1	234	Los Angeles	FZ	Renaissance Long Beach Hotel	111 E Ocean Blvd	Long Beach	90704	33.7593626	-118.2416893	3
2	235	Los Angeles	FZ	Holiday Inn Hotel Long Beach (Dwtn Area)	1133 Atlantic Ave	Long Beach	90704	33.7816303	-118.1851716	3
3	236	Los Angeles	FZ	Holiday Inn Hotel Long Beach-Airport (Conf Ctr)	2640 N Lakewood Blvd	Long Beach	90706	33.8034610	-118.1425580	3
4	237	Los Angeles	FZ	Comfort Inn & Suites Near Long Beach Conv Center	200 E Willow St	Long Beach	90706	33.8042468	-118.1908723	3
5	238	Los Angeles	FZ	Travelodge Long Beach Convention Center	80 Atlantic Ave	Long Beach	90802	33.7677371	-118.1850264	2
6	239	Los Angeles	FZ	Best Western of Long Beach	1725 Long Beach Blvd	Long Beach	90813	33.7887500	-118.1899050	2
7	240	Los Angeles	FZ	RI LONG BEACH	4111 E Willow St	Long Beach	90815	33.8035829	-118.1443800	3
8	241	Los Angeles	FZ	Marriott Long Beach Airport	4700 Airport Plaza Dr	Long Beach	90815	33.8115480	-118.1383780	3
9	242	Los Angeles	FZ	Extended Stay America Los Angeles - Long Beach Airport	4105 E Willow St	Long Beach	90815	33.8043260	-118.1463940	2
10	243	Los Angeles	FZ	Quality Inn Long Beach Airport	3201 E Pacific Coast Hwy	Long Beach	90755	33.7903280	-118.1543320	2
11	244	Los Angeles	FZ	Courtyard Long Beach Downtown	500 E 1st St	Long Beach	90802	33.7676010	-118.1856180	3
12	245	Los Angeles	FZ	Hotel Current	5325 Pacific Coast Hwy	Long Beach	90804	33.7814680	-118.1303120	3

Table B3. Los Angeles County Hotel Inventory (101 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (27 hotels)										
1	189	Los Angeles	CZ	Beach House Hotel Hermosa Beach	1300 The Strand	Hermosa Beach	90254	33.8626163	-118.4019475	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
2	190	Los Angeles	CZ	Hyatt Regency Long Beach	200 S Pine Ave	Long Beach	90802	33.7635248	-118.1914638	4
3	191	Los Angeles	CZ	RI Long Beach Downtown	600 Queensway Dr	Long Beach	90802	33.7587510	-118.2013113	3
4	192	Los Angeles	CZ	Best Western Golden Sails Htl	6285 E Pacific Coast Hwy	Long Beach	90803	33.7656980	-118.1156440	2
5	193	Los Angeles	CZ	Doubletree Hotel Maya	700 Queensway Dr	Long Beach	90802	33.7571330	-118.1985300	3
6	194	Los Angeles	CZ	Hyatt The Pike Long Beach	285 Bay St	Long Beach	90802	33.7649970	-118.1946570	3
7	195	Los Angeles	CZ	The Inn at Venice Beach	327 Washington Blvd	Marina Del Rey	90292	33.9808303	-118.4641381	3
8	196	Los Angeles	CZ	Marina Del Rey Marriott	4100 Admiralty Way	Marina Del Rey	90292	33.9820510	-118.4595250	3
9	197	Los Angeles	CZ	The Ritz Carlton, Marina Del Rey	4375 Admiralty Way	Marina Del Rey	90292	33.9847217	-118.4505725	5
10	198	Los Angeles	CZ	DoubleTree Hotel MDR Marina Del Rey	13480 Maxella Ave	Marina Del Rey	90292	33.9851010	-118.4410280	3
11	199	Los Angeles	CZ	Hilton Garden Inn Marina Del Rey	4200 Admiralty Way	Marina Del Rey	90292	33.9836080	-118.4572140	3
12	200	Los Angeles	CZ	Terranea Resort	100 Terranea Way	Rancho Palos Verdes	90275	33.7384620	-118.3978690	4
13	201	Los Angeles	CZ	The Portofino Hotel and Yacht Club - A Noble House Hotel	260 Portofino Way	Redondo Beach	90277	33.8443997	-118.3966112	3
14	202	Los Angeles	CZ	Crowne Plaza Hotel Redondo Beach and Marina	300 N Harbor Dr	Redondo Beach	90277	33.8454585	-118.3928619	3
15	203	Los Angeles	CZ	Ramada Limited Redondo Beach	435 S Pacific Coast Hwy	Redondo Beach	90277	33.8353422	-118.3853403	2
16	204	Los Angeles	CZ	The Huntley Hotel	1111 2nd St	Santa Monica	90401	34.0187223	-118.5010592	3
17	205	Los Angeles	CZ	Viceroy Santa Monica	1819 Ocean Ave	Santa Monica	90401	34.0079333	-118.4907767	3
18	206	Los Angeles	CZ	Shangri-La Hotel	1301 Ocean Ave	Santa Monica	90401	34.0154272	-118.4993043	3
19	207	Los Angeles	CZ	Loews Santa Monica Beach Hotel	1700 Ocean Ave	Santa Monica	90401	34.0091184	-118.4930376	4
20	208	Los Angeles	CZ	JW Marriott Santa Monica Le Merigot	1740 Ocean Ave	Santa Monica	90401	34.0084910	-118.4924020	4
21	209	Los Angeles	CZ	Oceana Santa Monica	849 Ocean Ave	Santa Monica	90403	34.0213830	-118.5059580	3
22	210	Los Angeles	CZ	Wyndham Santa Monica Beach @ The Pier	120 Colorado Ave	Santa Monica	90401	34.0118320	-118.4941630	3
23	211	Los Angeles	CZ	Fairmont Miramar	101 Wilshire Blvd	Santa Monica	90401	34.0179160	-118.5016220	4
24	212	Los Angeles	CZ	Georgian Hotel	1415 Ocean Ave	Santa Monica	90401	34.0136710	-118.4973510	3
25	213	Los Angeles	CZ	Ocean View Hotel	1447 Ocean Ave	Santa Monica	90401	34.0131740	-118.4965600	2
26	214	Los Angeles	CZ	Shore Hotel	1515 Ocean Ave	Santa Monica	90401	34.0127100	-118.4956390	4
27	215	Los Angeles	CZ	Le Meridien Delfina Santa Monica	530 Pico Blvd	Santa Monica	90405	34.0107850	-118.4853660	4
Outside Coastal Zone, Inside Five-Mile Zone (74 hotels)										
1	216	Los Angeles	FZ	Four Points by Sheraton Los Angeles Westside	5990 Green Valley Cir	Culver City	90230	33.9838010	-118.3938540	3
2	217	Los Angeles	FZ	Travelodge Los Angeles Culver City	11180 Washington Pl	Culver City	90232	34.0089013	-118.4134370	2
3	218	Los Angeles	FZ	Doubletree by Hilton Hotel Los Angeles International Airport	1985 E Grand Ave	El Segundo	90245	33.9198460	-118.3920390	3
4	219	Los Angeles	FZ	Embassy Stes Lax South	1440 E Imperial Ave	El Segundo	90245	33.9305740	-118.4007440	3
5	220	Los Angeles	FZ	Courtyard by Marriott Los Angeles LAX El Segundo	2000 E Mariposa Ave	El Segundo	90245	33.9230480	-118.3914590	3
6	221	Los Angeles	FZ	Hilton Garden Inn LAX El Segundo	2100 E Mariposa Ave	El Segundo	90245	33.9230230	-118.3883270	3
7	222	Los Angeles	FZ	Residence Inn by Marriott El Segundo	2135 E El Segundo Blvd	El Segundo	90245	33.9166190	-118.3887580	3
8	223	Los Angeles	FZ	Extended Stay America Los Angeles LAX Airport El Segundo	1910 E Mariposa Ave	El Segundo	90245	33.9235690	-118.3946800	2
9	224	Los Angeles	FZ	Hyatt Place Los Angeles LAX El Segundo	750 N Nash St	El Segundo	90245	33.9262100	-118.3871810	3
10	225	Los Angeles	FZ	Springhill Suites by Marriott Manhattan Beach	14620 Aviation Blvd	Hawthorne	90250	33.8986850	-118.3780930	3
11	226	Los Angeles	FZ	Towneplace Suites by Marriott Los Angeles LAX/Manhattan Beach	14400 Aviation Blvd	Hawthorne	90260	33.9009600	-118.3780790	2
12	227	Los Angeles	FZ	Hampton Inn Los Angeles International Airport Hawthorne	11430 Acacia Ave	Hawthorne	90250	33.9306680	-118.3506600	3
13	228	Los Angeles	FZ	Quality Inn & Suites Hermosa Beach	901 Aviation Blvd	Hermosa Beach	90254	33.8633567	-118.3911203	3
14	229	Los Angeles	FZ	Holiday Inn Express Hotel & Suites Hermosa Beach	125 Pacific Coast Hwy	Hermosa Beach	90254	33.8553203	-118.3906196	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
15	230	Los Angeles	FZ	Hampton Inn and Suites	1530 Pacific Coast Hwy	Hermosa Beach	90254	33.8658448	-118.3933275	3
16	231	Los Angeles	FZ	Wingate by Wyndham Los Angeles International Airport LAX	10300 S La Cienega Blvd	Inglewood	90304	33.9423811	-118.3699051	3
17	232	Los Angeles	FZ	Best Western South Bay Hotel	15000 Hawthorne Blvd	Lawndale	90260	33.8952471	-118.3522186	3
18	233	Los Angeles	FZ	Days Inn LAX Airport South Bay - Lawndale	15636 Hawthorne Blvd	Lawndale	90260	33.8886130	-118.3517860	2
19	234	Los Angeles	FZ	Renaissance Long Beach Hotel	111 E Ocean Blvd	Long Beach	90704	33.7593626	-118.2416893	3
20	235	Los Angeles	FZ	Holiday Inn Hotel Long Beach (Dwtn Area)	1133 Atlantic Ave	Long Beach	90704	33.7816303	-118.1851716	3
21	236	Los Angeles	FZ	Holiday Inn Hotel Long Beach-Airport (Conf Ctr)	2640 N Lakewood Blvd	Long Beach	90706	33.8034610	-118.1425580	3
22	237	Los Angeles	FZ	Comfort Inn & Suites Near Long Beach Conv Center	200 E Willow St	Long Beach	90706	33.8042468	-118.1908723	3
23	238	Los Angeles	FZ	Travelodge Long Beach Convention Center	80 Atlantic Ave	Long Beach	90802	33.7677371	-118.1850264	2
24	239	Los Angeles	FZ	Best Western of Long Beach	1725 Long Beach Blvd	Long Beach	90813	33.7887500	-118.1899050	2
25	240	Los Angeles	FZ	Ri LONG BEACH	4111 E Willow St	Long Beach	90815	33.8035829	-118.1443800	3
26	241	Los Angeles	FZ	Marriott Long Beach Airport	4700 Airport Plaza Dr	Long Beach	90815	33.8115480	-118.1383780	3
27	242	Los Angeles	FZ	Extended Stay America Los Angeles - Long Beach Airport	4105 E Willow St	Long Beach	90815	33.8043260	-118.1463940	2
28	243	Los Angeles	FZ	Quality Inn Long Beach Airport	3201 E Pacific Coast Hwy	Long Beach	90755	33.7903280	-118.1543320	2
29	244	Los Angeles	FZ	Courtyard Long Beach Downtown	500 E 1st St	Long Beach	90802	33.7676010	-118.1856180	3
30	245	Los Angeles	FZ	Hotel Current	5325 Pacific Coast Hwy	Long Beach	90804	33.7814680	-118.1303120	3
31	246	Los Angeles	FZ	Holiday Inn Lax	9901 S La Cienega Blvd	Los Angeles	90045	33.9462250	-118.3711880	3
32	247	Los Angeles	FZ	Sheraton	6101 W Century Blvd	Los Angeles	90045	33.9465310	-118.3907800	3
33	248	Los Angeles	FZ	Crowne Plaza Hotel Los Angeles-Intl Airport	5985 W Century Blvd	Los Angeles	90045	33.9461664	-118.3888496	3
34	249	Los Angeles	FZ	La Quinta Inn & Suites Lax	5249 W Century Blvd	Los Angeles	90045	33.9455416	-118.3719777	3
35	250	Los Angeles	FZ	Radisson Hotel at Los Angeles Airport	6225 W Century Blvd	Los Angeles	90045	33.9458500	-118.3950740	3
36	251	Los Angeles	FZ	Four Points by Sheraton Los Angeles International Airport	9750 Airport Blvd	Los Angeles	90045	33.9476210	-118.3850643	3
37	252	Los Angeles	FZ	Embassy Suites LAX North	9801 Airport Blvd	Los Angeles	90045	33.9469520	-118.3865090	3
38	253	Los Angeles	FZ	Super8 - Los Angeles International Airport Hotel	9250 Airport Blvd	Los Angeles	90045	33.9517758	-118.3857294	2
39	254	Los Angeles	FZ	Renaissance Los Angeles Airport Hotel	9620 Airport Blvd	Los Angeles	90045	33.9491980	-118.3852390	3
40	255	Los Angeles	FZ	Courtyard by Marriott Los Angeles Century Boulevard	6161 W Century Blvd	Los Angeles	90045	33.9467100	-118.3934150	3
41	256	Los Angeles	FZ	Extended Stay America Los Angeles - LAX Airport	6531 S Sepulveda Blvd	Los Angeles	90045	33.9798020	-118.3952220	2
42	257	Los Angeles	FZ	Hotel Angeleno - A Joie De Vivre Hotel	170 N Church Ln	Los Angeles	90049	34.0736528	-118.4681940	3
43	258	Los Angeles	FZ	Best Western Royal Palace Inn	2528 S Sepulveda Blvd	Los Angeles	90064	34.0342872	-118.4333214	3
44	259	Los Angeles	FZ	Super 8 Los Angeles Culver City	12664 Washington Blvd	Los Angeles	90066	33.9968273	-118.4338681	2
45	260	Los Angeles	FZ	Rodeway Inn Culver City	11933 Washington Blvd	Los Angeles	90066	33.9979704	-118.4207488	2
46	261	Los Angeles	FZ	Luxe City Center Hotel	1020 S Figueroa St	Los Angeles	90704	33.7831215	-118.2803158	4
47	262	Los Angeles	FZ	Marriott Los Angeles Airport	5855 W Century Blvd	Los Angeles	90045	33.9466180	-118.3846890	3
48	263	Los Angeles	FZ	Hilton Los Angeles Airport	5711 W Century Blvd	Los Angeles	90045	33.9460270	-118.3816610	3
49	264	Los Angeles	FZ	Westin Los Angeles Airport	5400 W Century Blvd	Los Angeles	90045	33.9446220	-118.3741430	3
50	265	Los Angeles	FZ	Luxe Hotel Sunset Boulevard	11461 Sunset Blvd	Los Angeles	90049	34.0724580	-118.4683240	3
51	266	Los Angeles	FZ	Marriott Manhattan Beach	1400 Parkview Ave	Manhattan Beach	90266	33.9001180	-118.3882440	3
52	267	Los Angeles	FZ	Residence Inn-Lax	1700 N Sepulveda Blvd	Manhattan Beach	90266	33.8903210	-118.3958520	3
53	268	Los Angeles	FZ	Hawthorn Suites	1817 N Sepulveda Blvd	Manhattan Beach	90266	33.8920444	-118.3961056	3
54	269	Los Angeles	FZ	The Belamar Hotel	3501 N Sepulveda Blvd	Manhattan Beach	90266	33.9005810	-118.3967820	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
55	270	Los Angeles	FZ	Best Western Redondo Beach Inn	1850 S Pacific Coast Hwy	Redondo Beach	90277	33.8164670	-118.3790855	3
56	271	Los Angeles	FZ	Best Western Redondo Beach Gal	2740 Artesia Blvd	Redondo Beach	90278	33.8724200	-118.3597140	2
57	272	Los Angeles	FZ	Residence Inn Los Angeles Redondo Beach	2420 Marine Ave.	Redondo Beach, CA	90278	33.8929910	-118.3655320	3
58	273	Los Angeles	FZ	Hilton Garden Inn Los Angeles Redondo Beach	2410 Marine Ave.	Redondo Beach, CA	90278	33.8938200	-118.3665990	3
59	274	Los Angeles	FZ	Crowne Plaza Hotel Los Angeles Harbor Hotel	601 S Palos Verdes St	San Pedro	90704	33.7383010	-118.2820330	3
60	275	Los Angeles	FZ	Comfort Inn Near Santa Monica Pier	2815 Santa Monica Blvd	Santa Monica	90404	34.0351666	-118.4719971	2
61	276	Los Angeles	FZ	Best Western Gateway Hotel	1920 Santa Monica Blvd	Santa Monica	90404	34.0285234	-118.4800942	3
62	277	Los Angeles	FZ	Travelodge Santa Monica Pico Blvd	3102 Pico Blvd	Santa Monica	90405	34.0259460	-118.4571110	2
63	278	Los Angeles	FZ	Ambrose Hotel	1255 20th St	Santa Monica	91307	34.0303334	-118.4818477	3
64	279	Los Angeles	FZ	Doubletree Guest Suites Santa Monica	1707 4th St	Santa Monica	90401	34.0114610	-118.4889900	3
65	280	Los Angeles	FZ	Travelodge Torrance/Redondo Beach	2448 W Sepulveda Blvd	Torrance	90501	33.8210880	-118.3269700	2
66	281	Los Angeles	FZ	Courtyard by Marriott Torrance Palos Verdes	2633 W Sepulveda Blvd	Torrance	90501	33.8227010	-118.3314556	3
67	282	Los Angeles	FZ	Residence Inn	3701 Torrance Blvd	Torrance	90503	33.8387260	-118.3518580	3
68	283	Los Angeles	FZ	Marriott Torrance South Bay	3635 Fashion Way	Torrance	90503	33.8354160	-118.3501623	3
69	284	Los Angeles	FZ	Staybridge Suites	19901 Prairie Ave	Torrance	90503	33.8504000	-118.3460650	3
70	285	Los Angeles	FZ	Ramada Inn Torrance - South Bay	2880 Pacific Coast Hwy	Torrance	90505	33.7945960	-118.3378410	2
71	286	Los Angeles	FZ	Doubletree Torrance South Bay	21333 Hawthorne Blvd	Torrance	90503	33.8348300	-118.3542790	3
72	287	Los Angeles	FZ	Best Western Plus Avita Suites	3531 Torrance Blvd	Torrance	90503	33.8381180	-118.3480560	3
73	288	Los Angeles	FZ	Holiday Inn Express West Los Angeles	11250 Santa Monica Blvd	West Los Angeles	90025	34.0465740	-118.4473380	3
74	289	Los Angeles	FZ	BEST WESTERN Los Angeles Worldport Hotel	1402 W Pacific Coast Hwy	Wilmington	90803	33.7905820	-118.2830280	2

Table B4. Orange County Hotel Inventory (42 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (26 hotels)										
1	290	Orange	CZ	Ritz Carlton Laguna Niguel	1 Ritz Carlton Dr	Dana Point	92629	33.4765740	-117.7184310	5
2	291	Orange	CZ	Laguna Cliffs Resort	25135 Park Lantern	Dana Point	92629	33.4644157	-117.6914521	4
3	292	Orange	CZ	Best Western Plus Dana Point Inn By The Sea	34744 Coast Hwy	Dana Point	92624	33.4577300	-117.6705530	3
4	293	Orange	CZ	Doubletree Doheny Beach	34402 Pacific Coast Hwy	Dana Point	92629	33.4638270	-117.6816590	3
5	294	Orange	CZ	Best Western Plus Marina Shores Hotel	34280 Pacific Coast Hwy	Dana Point	92629	33.4658350	-117.6894270	3
6	295	Orange	CZ	St Regis Monarch Beach	1 Monarch Beach Resort N	Dana Point	92629	33.4822260	-117.7151730	5
7	296	Orange	CZ	BEST WESTERN Huntington Beach Inn	800 Pacific Coast Hwy	Huntington Beach	92648	33.6597944	-118.0052465	2
8	297	Orange	CZ	Hilton Waterfront Beach Resort	21100 Pacific Coast Hwy	Huntington Beach	92648	33.6532930	-117.9944030	4
9	298	Orange	CZ	Hyatt Regency Huntington Beach & Spa	21500 Pacific Coast Hwy	Huntington Beach	92648	33.6508470	-117.9903820	4
10	299	Orange	CZ	Best Western Laguna Brisas Spa	1600 S Coast Hwy	Laguna Beach	92651	33.5299868	-117.7724622	3
11	300	Orange	CZ	Surf and Sand Resort	1555 S Coast Hwy	Laguna Beach	92651	33.5303591	-117.7731664	4
12	301	Orange	CZ	Laguna Cliffs Inn	475 N Coast Hwy	Laguna Beach	92651	33.5448478	-117.7914419	3
13	302	Orange	CZ	Holiday Inn Laguna Beach	696 S Coast Hwy	Laguna Beach	92651	33.5380330	-117.7794000	3
14	303	Orange	CZ	Montage Laguna Beach	30801 S Coast Hwy	Laguna Beach	92651	33.5151530	-117.7570210	5
15	304	Orange	CZ	Hyatt Regency Newport Beach	1107 Jamboree Rd	Newport Beach	92660	33.6167331	-117.8879333	3
16	305	Orange	CZ	Newport Beach Marriott Bayview	500 Bayview Cir	Newport Beach	92660	33.6536018	-117.8681731	3
17	306	Orange	CZ	Newport Channel Inn	6030 West Coast Hwy	Newport Beach	92663	33.6258907	-117.9480626	2

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
18	307	Orange	CZ	Best Western Newport Beach Inn	6208 West Coast Hwy	Newport Beach	92663	33.6266580	-117.9493150	3
19	308	Orange	CZ	The Balboa Bay Club and Resort	1221 West Coast Hwy	Newport Beach	92663	33.6154726	-117.9143447	4
20	309	Orange	CZ	Bay Shores Peninsula Hotel	1800 W Balboa Blvd	Newport Beach	92663	33.6078950	-117.9251630	3
21	310	Orange	CZ	Pelican Hill Resort	22701 Pelican Hill Rd S	Newport Coast	92648	33.5868370	-117.8430420	5
22	311	Orange	CZ	Best Western Casablanca Inn	1601 N El Camino Real	San Clemente	92672	33.4328790	-117.6281340	2
23	312	Orange	CZ	Rodeway Inn San Clemente Beach	1301 N El Camino Real	San Clemente	92672	33.4322310	-117.6228010	2
24	313	Orange	CZ	Pacific Inn	600 Marina Dr	Seal Beach	90740	33.7449834	-118.1058175	3
25	314	Orange	CZ	Hampton Inn and Suites	2401 Seal Beach Blvd	Seal Beach	90740	33.7589180	-118.0814560	3
26	315	Orange	CZ	Best Western Harbour Inn & Suites	16912 Pacific Coast Hwy	Sunset Beach	90742	33.7164460	-118.0681290	3
Outside Coastal Zone, Inside Five-Mile Zone (16 hotels)										
1	316	Orange	FZ	Super 8 Costa Mesa Newport Beach	2645 Harbor Blvd	Costa Mesa	92626	33.6692910	-117.9201000	2
2	317	Orange	FZ	Best Western Newport Mesa Inn	2642 Newport Blvd	Costa Mesa	92627	33.6636840	-117.8954220	3
3	318	Orange	FZ	Travelodge Costa Mesa Newport Beach	1951 Costa Mesa Fwy	Costa Mesa	92627	33.6557417	-117.9050645	2
4	319	Orange	FZ	Ramada Inn and Suites Costa Mesa/Newport Beach	1680 Superior Ave	Costa Mesa	92627	33.6356133	-117.9240199	3
5	320	Orange	FZ	Holiday Inn Express Hotel & Suites Costa Mesa	2070 Costa Mesa Fwy	Costa Mesa	92627	33.6477301	-117.9124861	3
6	321	Orange	FZ	BLVD Hotel	2430 Newport Blvd	Costa Mesa	92627	33.6577080	-117.9015190	3
7	322	Orange	FZ	Best Western Regency Inn	19360 Beach Blvd	Huntington Beach	92646	33.6812045	-117.9885597	3
8	323	Orange	FZ	Howard Johnson Huntington Beach	17251 Beach Blvd	Huntington Beach	92647	33.7118820	-117.9894330	2
9	324	Orange	FZ	Comfort Suites Huntington Beach	16301 Beach Blvd	Huntington Beach	92647	33.7258490	-117.9894660	2
10	325	Orange	FZ	The Island Hotel	690 Newport Center Dr	Newport Beach	92660	33.6193350	-117.8756692	5
11	326	Orange	FZ	Holiday Inn Express San Clemente	35 Via Pico Plaza	San Clemente	92672	33.4353990	-117.6189420	3
12	327	Orange	FZ	Hampton Inn and Suites	2481 S El Camino Real	San Clemente	92672	33.4102600	-117.5998930	3
13	328	Orange	FZ	San Clemente Beach Travelodge	2441 S El Camino Real	San Clemente	92672	33.4108708	-117.6002653	2
14	329	Orange	FZ	Best Western Capistrano Inn	27174 Ortega Hwy	San Juan Capistrano	92675	33.5019800	-117.6564860	3
15	330	Orange	FZ	Residence Inn Dana Point San Juan Capistrano	33711 Camino Capistrano	San Juan Capistrano	92675	33.4732370	-117.6765260	3
16	331	Orange	FZ	Best Western Westminster Inn	5755 Westminster Blvd	Westminster	92683	33.7591023	-118.0286926	2

Table B5. Los Angeles County and Orange County Hotel Inventory (143 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (53 hotels)										
1	189	Los Angeles	CZ	Beach House Hotel Hermosa Beach	1300 The Strand	Hermosa Beach	90254	33.8626163	-118.4019475	3
2	190	Los Angeles	CZ	Hyatt Regency Long Beach	200 S Pine Ave	Long Beach	90802	33.7635248	-118.1914638	4
3	191	Los Angeles	CZ	RI Long Beach Downtown	600 Queensway Dr	Long Beach	90802	33.7587510	-118.2013113	3
4	192	Los Angeles	CZ	Best Western Golden Sails Htl	6285 E Pacific Coast Hwy	Long Beach	90803	33.7656980	-118.1156440	2
5	193	Los Angeles	CZ	Doubletree Hotel Maya	700 Queensway Dr	Long Beach	90802	33.7571330	-118.1985300	3
6	194	Los Angeles	CZ	Hyatt The Pike Long Beach	285 Bay St	Long Beach	90802	33.7649970	-118.1946570	3
7	195	Los Angeles	CZ	The Inn at Venice Beach	327 Washington Blvd	Marina Del Rey	90292	33.9808303	-118.4641381	3
8	196	Los Angeles	CZ	Marina Del Rey Marriott	4100 Admiralty Way	Marina Del Rey	90292	33.9820510	-118.4595250	3
9	197	Los Angeles	CZ	The Ritz Carlton, Marina Del Rey	4375 Admiralty Way	Marina Del Rey	90292	33.9847217	-118.4505725	5
10	198	Los Angeles	CZ	DoubleTree Hotel MDR Marina Del Rey	13480 Maxella Ave	Marina Del Rey	90292	33.9851010	-118.4410280	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
11	199	Los Angeles	CZ	Hilton Garden Inn Marina Del Rey	4200 Admiralty Way	Marina Del Rey	90292	33.9836080	-118.4572140	3
12	200	Los Angeles	CZ	Terranea Resort	100 Terranea Way	Rancho Palos Verdes	90275	33.7384620	-118.3978690	4
13	201	Los Angeles	CZ	The Portofino Hotel and Yacht Club - A Noble House Hotel	260 Portofino Way	Redondo Beach	90277	33.8443997	-118.3966112	3
14	202	Los Angeles	CZ	Crowne Plaza Hotel Redondo Beach and Marina	300 N Harbor Dr	Redondo Beach	90277	33.8454585	-118.3928619	3
15	203	Los Angeles	CZ	Ramada Limited Redondo Beach	435 S Pacific Coast Hwy	Redondo Beach	90277	33.8353422	-118.3853403	2
16	204	Los Angeles	CZ	The Huntley Hotel	1111 2nd St	Santa Monica	90401	34.0187223	-118.5010592	3
17	205	Los Angeles	CZ	Viceroy Santa Monica	1819 Ocean Ave	Santa Monica	90401	34.0079333	-118.4907767	3
18	206	Los Angeles	CZ	Shangri-La Hotel	1301 Ocean Ave	Santa Monica	90401	34.0154272	-118.4993043	3
19	207	Los Angeles	CZ	Loews Santa Monica Beach Hotel	1700 Ocean Ave	Santa Monica	90401	34.0091184	-118.4930376	4
20	208	Los Angeles	CZ	JW Marriott Santa Monica Le Merigot	1740 Ocean Ave	Santa Monica	90401	34.0084910	-118.4924020	4
21	209	Los Angeles	CZ	Oceana Santa Monica	849 Ocean Ave	Santa Monica	90403	34.0213830	-118.5059580	3
22	210	Los Angeles	CZ	Wyndham Santa Monica Beach @ The Pier	120 Colorado Ave	Santa Monica	90401	34.0118320	-118.4941630	3
23	211	Los Angeles	CZ	Fairmont Miramar	101 Wilshire Blvd	Santa Monica	90401	34.0179160	-118.5016220	4
24	212	Los Angeles	CZ	Georgian Hotel	1415 Ocean Ave	Santa Monica	90401	34.0136710	-118.4973510	3
25	213	Los Angeles	CZ	Ocean View Hotel	1447 Ocean Ave	Santa Monica	90401	34.0131740	-118.4965600	2
26	214	Los Angeles	CZ	Shore Hotel	1515 Ocean Ave	Santa Monica	90401	34.0127100	-118.4956390	4
27	215	Los Angeles	CZ	Le Meridien Delfina Santa Monica	530 Pico Blvd	Santa Monica	90405	34.0107850	-118.4853660	4
28	290	Orange	CZ	Ritz Carlton Laguna Niguel	1 Ritz Carlton Dr	Dana Point	92629	33.4765740	-117.7184310	5
29	291	Orange	CZ	Laguna Cliffs Resort	25135 Park Lantern	Dana Point	92629	33.4644157	-117.6914521	4
30	292	Orange	CZ	Best Western Plus Dana Point Inn By The Sea	34744 Coast Hwy	Dana Point	92624	33.4577300	-117.6705530	3
31	293	Orange	CZ	Doubletree Doheny Beach	34402 Pacific Coast Hwy	Dana Point	92629	33.4638270	-117.6816590	3
32	294	Orange	CZ	Best Western Plus Marina Shores Hotel	34280 Pacific Coast Hwy	Dana Point	92629	33.4658350	-117.6894270	3
33	295	Orange	CZ	St Regis Monarch Beach	1 Monarch Beach Resort N	Dana Point	92629	33.4822260	-117.7151730	5
34	296	Orange	CZ	BEST WESTERN Huntington Beach Inn	800 Pacific Coast Hwy	Huntington Beach	92648	33.6597944	-118.0052465	2
35	297	Orange	CZ	Hilton Waterfront Beach Resort	21100 Pacific Coast Hwy	Huntington Beach	92648	33.6532930	-117.9944030	4
36	298	Orange	CZ	Hyatt Regency Huntington Beach & Spa	21500 Pacific Coast Hwy	Huntington Beach	92648	33.6508470	-117.9903820	4
37	299	Orange	CZ	Best Western Laguna Brisas Spa	1600 S Coast Hwy	Laguna Beach	92651	33.5299868	-117.7724622	3
38	300	Orange	CZ	Surf and Sand Resort	1555 S Coast Hwy	Laguna Beach	92651	33.5303591	-117.7731664	4
39	301	Orange	CZ	Laguna Cliffs Inn	475 N Coast Hwy	Laguna Beach	92651	33.5448478	-117.7914419	3
40	302	Orange	CZ	Holiday Inn Laguna Beach	696 S Coast Hwy	Laguna Beach	92651	33.5380330	-117.7794000	3
41	303	Orange	CZ	Montage Laguna Beach	30801 S Coast Hwy	Laguna Beach	92651	33.5151530	-117.7570210	5
42	304	Orange	CZ	Hyatt Regency Newport Beach	1107 Jamboree Rd	Newport Beach	92660	33.6167331	-117.8879333	3
43	305	Orange	CZ	Newport Beach Marriott Bayview	500 Bayview Cir	Newport Beach	92660	33.6536018	-117.8681731	3
44	306	Orange	CZ	Newport Channel Inn	6030 West Coast Hwy	Newport Beach	92663	33.6258907	-117.9480626	2
45	307	Orange	CZ	Best Western Newport Beach Inn	6208 West Coast Hwy	Newport Beach	92663	33.6266580	-117.9493150	3
46	308	Orange	CZ	The Balboa Bay Club and Resort	1221 West Coast Hwy	Newport Beach	92663	33.6154726	-117.9143447	4
47	309	Orange	CZ	Bay Shores Peninsula Hotel	1800 W Balboa Blvd	Newport Beach	92663	33.6078950	-117.9251630	3
48	310	Orange	CZ	Pelican Hill Resort	22701 Pelican Hill Rd S	Newport Coast	92648	33.5868370	-117.8430420	5

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
49	311	Orange	CZ	Best Western Casablanca Inn	1601 N El Camino Real	San Clemente	92672	33.4328790	-117.6281340	2
50	312	Orange	CZ	Rodeway Inn San Clemente Beach	1301 N El Camino Real	San Clemente	92672	33.4322310	-117.6228010	2
51	313	Orange	CZ	Pacific Inn	600 Marina Dr	Seal Beach	90740	33.7449834	-118.1058175	3
52	314	Orange	CZ	Hampton Inn and Suites	2401 Seal Beach Blvd	Seal Beach	90740	33.7589180	-118.0814560	3
53	315	Orange	CZ	Best Western Harbour Inn & Suites	16912 Pacific Coast Hwy	Sunset Beach	90742	33.7164460	-118.0681290	3
Outside Coastal Zone, Inside Five-Mile Zone (90 hotels)										
1	216	Los Angeles	FZ	Four Points by Sheraton Los Angeles Westside	5990 Green Valley Cir	Culver City	90230	33.9838010	-118.3938540	3
2	217	Los Angeles	FZ	Travelodge Los Angeles Culver City	11180 Washington Pl	Culver City	90232	34.0089013	-118.4134370	2
3	218	Los Angeles	FZ	Doubletree by Hilton Hotel Los Angeles International Airport	1985 E Grand Ave	El Segundo	90245	33.9198460	-118.3920390	3
4	219	Los Angeles	FZ	Embassy Stes Lax South	1440 E Imperial Ave	El Segundo	90245	33.9305740	-118.4007440	3
5	220	Los Angeles	FZ	Courtyard by Marriott Los Angeles LAX El Segundo	2000 E Mariposa Ave	El Segundo	90245	33.9230480	-118.3914590	3
6	221	Los Angeles	FZ	Hilton Garden Inn LAX El Segundo	2100 E Mariposa Ave	El Segundo	90245	33.9230230	-118.3883270	3
7	222	Los Angeles	FZ	Residence Inn by Marriott El Segundo	2135 E El Segundo Blvd	El Segundo	90245	33.9166190	-118.3887580	3
8	223	Los Angeles	FZ	Extended Stay America Los Angeles LAX Airport El Segundo	1910 E Mariposa Ave	El Segundo	90245	33.9235690	-118.3946800	2
9	224	Los Angeles	FZ	Hyatt Place Los Angeles LAX El Segundo	750 N Nash St	El Segundo	90245	33.9262100	-118.3871810	3
10	225	Los Angeles	FZ	Springhill Suites by Marriott Manhattan Beach	14620 Aviation Blvd	Hawthorne	90250	33.8986850	-118.3780930	3
11	226	Los Angeles	FZ	Towneplace Suites by Marriott Los Angeles LAX/Manhattan Beach	14400 Aviation Blvd	Hawthorne	90260	33.9009600	-118.3780790	2
12	227	Los Angeles	FZ	Hampton Inn Los Angeles International Airport Hawthorne	11430 Acacia Ave.	Hawthorne	90250	33.9306680	-118.3506600	3
13	228	Los Angeles	FZ	Quality Inn & Suites Hermosa Beach	901 Aviation Blvd	Hermosa Beach	90254	33.8633567	-118.3911203	3
14	229	Los Angeles	FZ	Holiday Inn Express Hotel & Suites Hermosa Beach	125 Pacific Coast Hwy	Hermosa Beach	90254	33.8553203	-118.3906196	3
15	230	Los Angeles	FZ	Hampton Inn and Suites	1530 Pacific Coast Hwy	Hermosa Beach	90254	33.8658448	-118.3933275	3
16	231	Los Angeles	FZ	Wingate by Wyndham Los Angeles International Airport LAX	10300 S La Cienega Blvd	Inglewood	90304	33.9423811	-118.3699051	3
17	232	Los Angeles	FZ	Best Western South Bay Hotel	15000 Hawthorne Blvd	Lawndale	90260	33.8952471	-118.3522186	3
18	233	Los Angeles	FZ	Days Inn LAX Airport South Bay - Lawndale	15636 Hawthorne Blvd	Lawndale	90260	33.8886130	-118.3517860	2
19	234	Los Angeles	FZ	Renaissance Long Beach Hotel	111 E Ocean Blvd	Long Beach	90704	33.7593626	-118.2416893	3
20	235	Los Angeles	FZ	Holiday Inn Hotel Long Beach (Dwtin Area)	1133 Atlantic Ave	Long Beach	90704	33.7816303	-118.1851716	3
21	236	Los Angeles	FZ	Holiday Inn Hotel Long Beach-Airport (Conf Ctr)	2640 N Lakewood Blvd	Long Beach	90706	33.8034610	-118.1425580	3
22	237	Los Angeles	FZ	Comfort Inn & Suites Near Long Beach Conv Center	200 E Willow St	Long Beach	90706	33.8042468	-118.1908723	3
23	238	Los Angeles	FZ	Travelodge Long Beach Convention Center	80 Atlantic Ave	Long Beach	90802	33.7677371	-118.1850264	2
24	239	Los Angeles	FZ	Best Western of Long Beach	1725 Long Beach Blvd	Long Beach	90813	33.7887500	-118.1899050	2
25	240	Los Angeles	FZ	RI LONG BEACH	4111 E Willow St	Long Beach	90815	33.8035829	-118.1443800	3
26	241	Los Angeles	FZ	Marriott Long Beach Airport	4700 Airport Plaza Dr	Long Beach	90815	33.8115480	-118.1383780	3
27	242	Los Angeles	FZ	Extended Stay America Los Angeles - Long Beach Airport	4105 E Willow St	Long Beach	90815	33.8043260	-118.1463940	2
28	243	Los Angeles	FZ	Quality Inn Long Beach Airport	3201 E Pacific Coast Hwy	Long Beach	90755	33.7903280	-118.1543320	2
29	244	Los Angeles	FZ	Courtyard Long Beach Downtown	500 E 1st St	Long Beach	90802	33.7676010	-118.1856180	3
30	245	Los Angeles	FZ	Hotel Current	5325 Pacific Coast Hwy	Long Beach	90804	33.7814680	-118.1303120	3
31	246	Los Angeles	FZ	Holiday Inn Lax	9901 S La Cienega Blvd	Los Angeles	90045	33.9462250	-118.3711880	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
32	247	Los Angeles	FZ	Sheraton	6101 W Century Blvd	Los Angeles	90045	33.9465310	-118.3907800	3
33	248	Los Angeles	FZ	Crowne Plaza Hotel Los Angeles-Intl Airport	5985 W Century Blvd	Los Angeles	90045	33.9461664	-118.3888496	3
34	249	Los Angeles	FZ	La Quinta Inn & Suites Lax	5249 W Century Blvd	Los Angeles	90045	33.9455416	-118.3719777	3
35	250	Los Angeles	FZ	Radisson Hotel at Los Angeles Airport	6225 W Century Blvd	Los Angeles	90045	33.9458500	-118.3950740	3
36	251	Los Angeles	FZ	Four Points by Sheraton Los Angeles International Airport	9750 Airport Blvd	Los Angeles	90045	33.9476210	-118.3850643	3
37	252	Los Angeles	FZ	Embassy Suites LAX North	9801 Airport Blvd	Los Angeles	90045	33.9469520	-118.3865090	3
38	253	Los Angeles	FZ	Super8 - Los Angeles International Airport Hotel	9250 Airport Blvd	Los Angeles	90045	33.9517758	-118.3857294	2
39	254	Los Angeles	FZ	Renaissance Los Angeles Airport Hotel	9620 Airport Blvd	Los Angeles	90045	33.9491980	-118.3852390	3
40	255	Los Angeles	FZ	Courtyard by Marriott Los Angeles Century Boulevard	6161 W Century Blvd	Los Angeles	90045	33.9467100	-118.3934150	3
41	256	Los Angeles	FZ	Extended Stay America Los Angeles - LAX Airport	6531 S Sepulveda Blvd	Los Angeles	90045	33.9798020	-118.3952220	2
42	257	Los Angeles	FZ	Hotel Angeleno - A Joie De Vivre Hotel	170 N Church Ln	Los Angeles	90049	34.0736528	-118.4681940	3
43	258	Los Angeles	FZ	Best Western Royal Palace Inn	2528 S Sepulveda Blvd	Los Angeles	90064	34.0342872	-118.4333214	3
44	259	Los Angeles	FZ	Super 8 Los Angeles Culver City	12664 Washington Blvd	Los Angeles	90066	33.9968273	-118.4338681	2
45	260	Los Angeles	FZ	Rodeway Inn Culver City	11933 Washington Blvd	Los Angeles	90066	33.9979704	-118.4207488	2
46	261	Los Angeles	FZ	Luxe City Center Hotel	1020 S Figueroa St	Los Angeles	90704	33.7831215	-118.2803158	4
47	262	Los Angeles	FZ	Marriott Los Angeles Airport	5855 W Century Blvd	Los Angeles	90045	33.9466180	-118.3846890	3
48	263	Los Angeles	FZ	Hilton Los Angeles Airport	5711 W Century Blvd	Los Angeles	90045	33.9460270	-118.3816610	3
49	264	Los Angeles	FZ	Westin Los Angeles Airport	5400 W Century Blvd	Los Angeles	90045	33.9446220	-118.3741430	3
50	265	Los Angeles	FZ	Luxe Hotel Sunset Boulevard	11461 Sunset Blvd	Los Angeles	90049	34.0724580	-118.4683240	3
51	266	Los Angeles	FZ	Marriott Manhattan Beach	1400 Parkview Ave	Manhattan Beach	90266	33.9001180	-118.3882440	3
52	267	Los Angeles	FZ	Residence Inn-Lax	1700 N Sepulveda Blvd	Manhattan Beach	90266	33.8903210	-118.3958520	3
53	268	Los Angeles	FZ	Hawthorn Suites	1817 N Sepulveda Blvd	Manhattan Beach	90266	33.8920444	-118.3961056	3
54	269	Los Angeles	FZ	The Belamar Hotel	3501 N Sepulveda Blvd	Manhattan Beach	90266	33.9005810	-118.3967820	3
55	270	Los Angeles	FZ	Best Western Redondo Beach Inn	1850 S Pacific Coast Hwy	Redondo Beach	90277	33.8164670	-118.3790855	3
56	271	Los Angeles	FZ	Best Western Redondo Beach	2740 Artesia Gal	Redondo Beach	90278	33.8724200	-118.3597140	2
57	272	Los Angeles	FZ	Residence Inn Los Angeles Redondo Beach	2420 Marine Ave.	Redondo Beach, CA	90278	33.8929910	-118.3655320	3
58	273	Los Angeles	FZ	Hilton Garden Inn Los Angeles Redondo Beach	2410 Marine Ave.	Redondo Beach, CA	90278	33.8938200	-118.3665990	3
59	274	Los Angeles	FZ	Crowne Plaza Hotel Los Angeles Harbor Hotel	601 S Palos Verdes St	San Pedro	90704	33.7383010	-118.2820330	3
60	275	Los Angeles	FZ	Comfort Inn Near Santa Monica Pier	2815 Santa Monica Blvd	Santa Monica	90404	34.0351666	-118.4719971	2
61	276	Los Angeles	FZ	Best Western Gateway Hotel	1920 Santa Monica Blvd	Santa Monica	90404	34.0285234	-118.4800942	3
62	277	Los Angeles	FZ	Travelodge Santa Monica Pico Blvd	3102 Pico Blvd	Santa Monica	90405	34.0259460	-118.4571110	2
63	278	Los Angeles	FZ	Ambrose Hotel	1255 20th St	Santa Monica	91307	34.0303334	-118.4818477	3
64	279	Los Angeles	FZ	Doubletree Guest Suites Santa Monica	1707 4th St	Santa Monica	90401	34.0114610	-118.4889900	3
65	280	Los Angeles	FZ	Travelodge Torrance/Redondo Beach	2448 W Sepulveda Blvd	Torrance	90501	33.8210880	-118.3269700	2
66	281	Los Angeles	FZ	Courtyard by Marriott Torrance Palos Verdes	2633 W Sepulveda Blvd	Torrance	90501	33.8227010	-118.3314556	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
67	282	Los Angeles	FZ	Residence Inn	3701 Torrance Blvd	Torrance	90503	33.8387260	-118.3518580	3
68	283	Los Angeles	FZ	Marriott Torrance South Bay	3635 Fashion Way	Torrance	90503	33.8354160	-118.3501623	3
69	284	Los Angeles	FZ	Staybridge Suites	19901 Prairie Ave	Torrance	90503	33.8504000	-118.3460650	3
70	285	Los Angeles	FZ	Ramada Inn Torrance - South Bay	2880 Pacific Coast Hwy	Torrance	90505	33.7945960	-118.3378410	2
71	286	Los Angeles	FZ	Doubletree Torrance South Bay	21333 Hawthorne Blvd	Torrance	90503	33.8348300	-118.3542790	3
72	287	Los Angeles	FZ	Best Western Plus Avita Suites	3531 Torrance Blvd	Torrance	90503	33.8381180	-118.3480560	3
73	288	Los Angeles	FZ	Holiday Inn Express West Los Angeles	11250 Santa Monica Blvd	West Los Angeles	90025	34.0465740	-118.4473380	3
74	289	Los Angeles	FZ	BEST WESTERN Los Angeles Worldport Hotel	1402 W Pacific Coast Hwy	Wilmington	90803	33.7905820	-118.2830280	2
75	316	Orange	FZ	Super 8 Costa Mesa Newport Beach	2645 Harbor Blvd	Costa Mesa	92626	33.6692910	-117.9201000	2
76	317	Orange	FZ	Best Western Newport Mesa Inn	2642 Newport Blvd	Costa Mesa	92627	33.6636840	-117.8954220	3
77	318	Orange	FZ	Travelodge Costa Mesa Newport Beach	1951 Costa Mesa Fwy	Costa Mesa	92627	33.6557417	-117.9050645	2
78	319	Orange	FZ	Ramada Inn and Suites Costa Mesa/Newport Beach	1680 Superior Ave	Costa Mesa	92627	33.6356133	-117.9240199	3
79	320	Orange	FZ	Holiday Inn Express Hotel & Suites Costa Mesa	2070 Costa Mesa Fwy	Costa Mesa	92627	33.6477301	-117.9124861	3
80	321	Orange	FZ	BLVD Hotel	2430 Newport Blvd	Costa Mesa	92627	33.6577080	-117.9015190	3
81	322	Orange	FZ	Best Western Regency Inn	19360 Beach Blvd	Huntington Beach	92646	33.6812045	-117.9885597	3
82	323	Orange	FZ	Howard Johnson Huntington Beach	17251 Beach Blvd	Huntington Beach	92647	33.7118820	-117.9894330	2
83	324	Orange	FZ	Comfort Suites Huntington Beach	16301 Beach Blvd	Huntington Beach	92647	33.7258490	-117.9894660	2
84	325	Orange	FZ	The Island Hotel	690 Newport Center Dr	Newport Beach	92660	33.6193350	-117.8756692	5
85	326	Orange	FZ	Holiday Inn Express San Clemente	35 Via Pico Plaza	San Clemente	92672	33.4353990	-117.6189420	3
86	327	Orange	FZ	Hampton Inn and Suites	2481 S El Camino Real	San Clemente	92672	33.4102600	-117.5998930	3
87	328	Orange	FZ	San Clemente Beach Travelodge	2441 S El Camino Real	San Clemente	92672	33.4108708	-117.6002653	2
88	329	Orange	FZ	Best Western Capistrano Inn	27174 Ortega Hwy	San Juan Capistrano	92675	33.5019800	-117.6564860	3
89	330	Orange	FZ	Residence Inn Dana Point San Juan Capistrano	33711 Camino Capistrano	San Juan Capistrano	92675	33.4732370	-117.6765260	3
90	331	Orange	FZ	Best Western Westminster Inn	5755 Westminster Blvd	Westminster	92683	33.7591023	-118.0286926	2

B3. Hotel Maps

Figures B1 through B3 show maps of Coastal Zone and Five-Mile Zone hotels for the City of Long Beach, Los Angeles County, and Orange County. The hotels presented in these maps include all AAA-rated and non-AAA-rated hotels. The maps do not include new hotels added from the September 24, 2015 STR participation list of new hotels participating in STR surveys since January 1, 2014. The mapping process for the new hotels is explained in Chapter 5 and a listing of these hotels is provided in Appendix D.

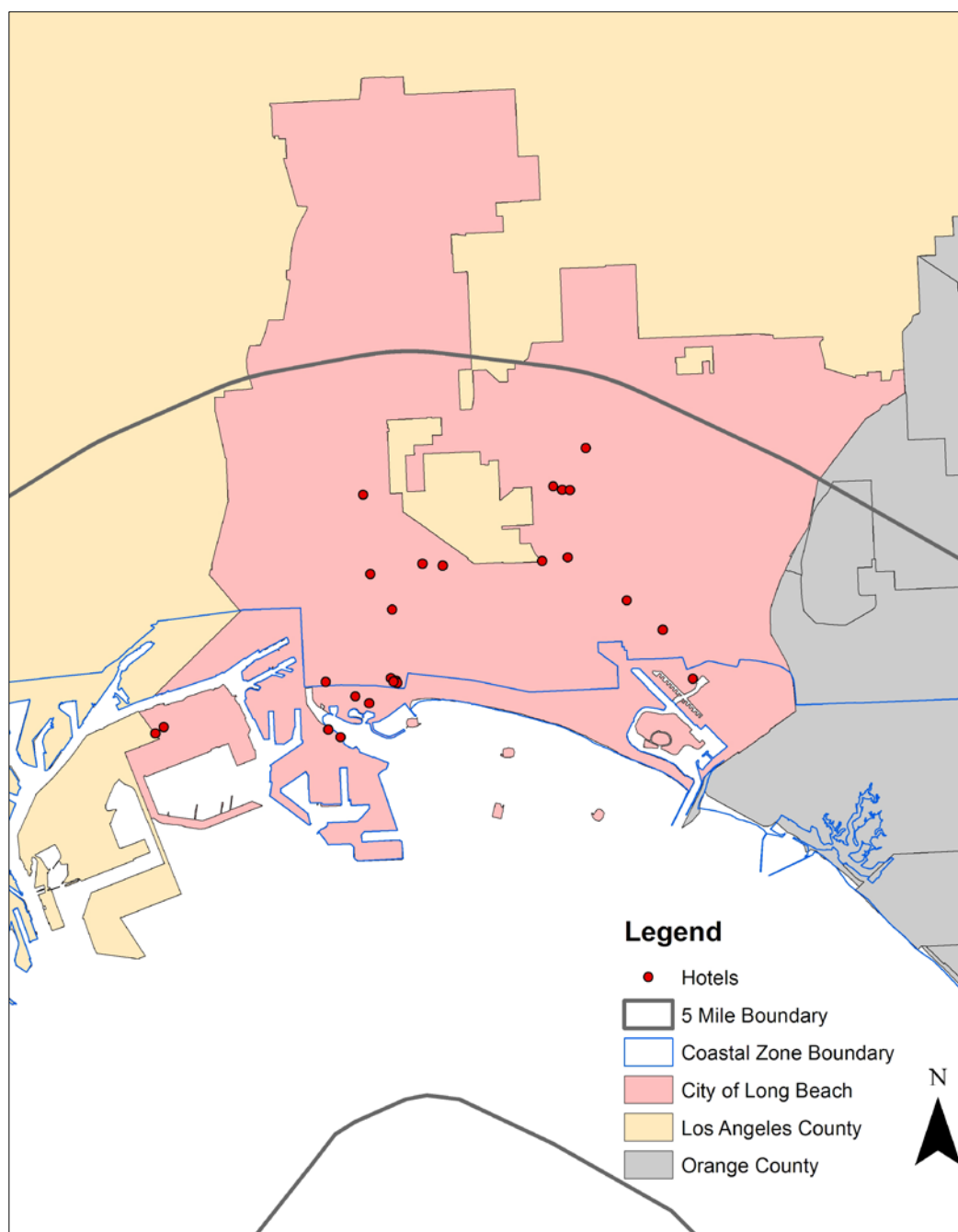


Figure B1. City of Long Beach Hotel Map

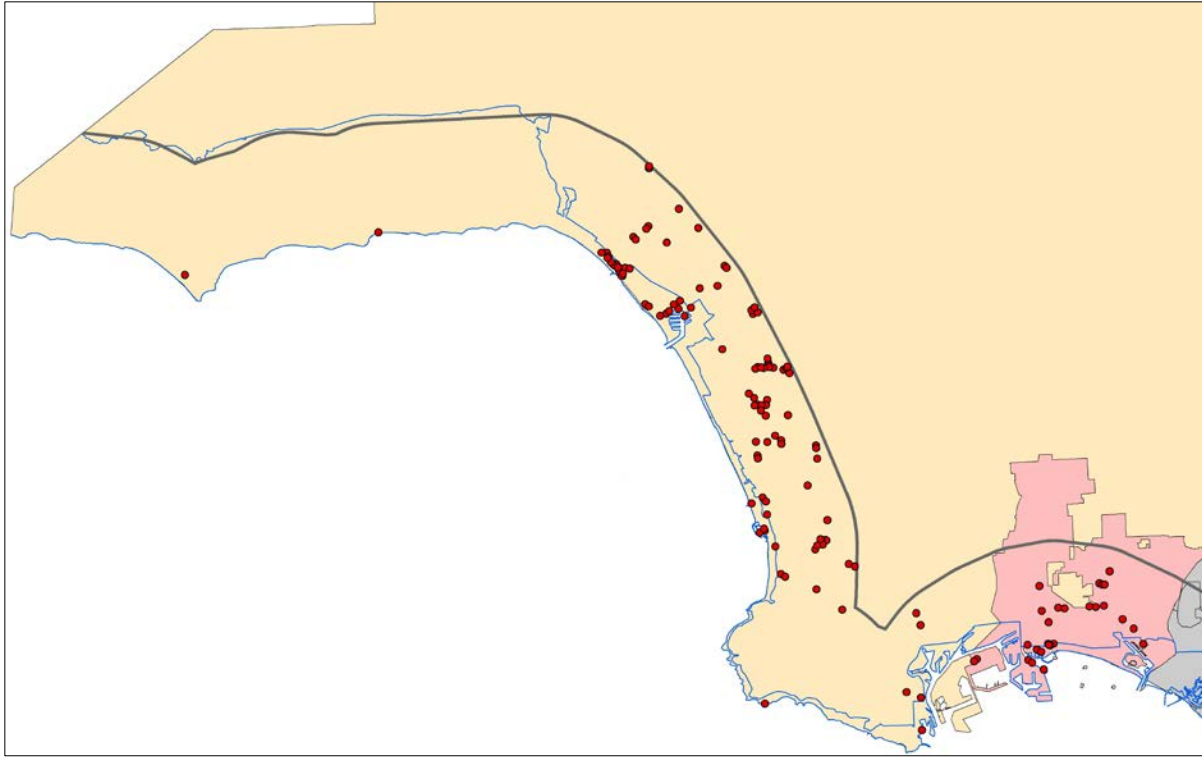


Figure B2. Los Angeles County Hotel Map

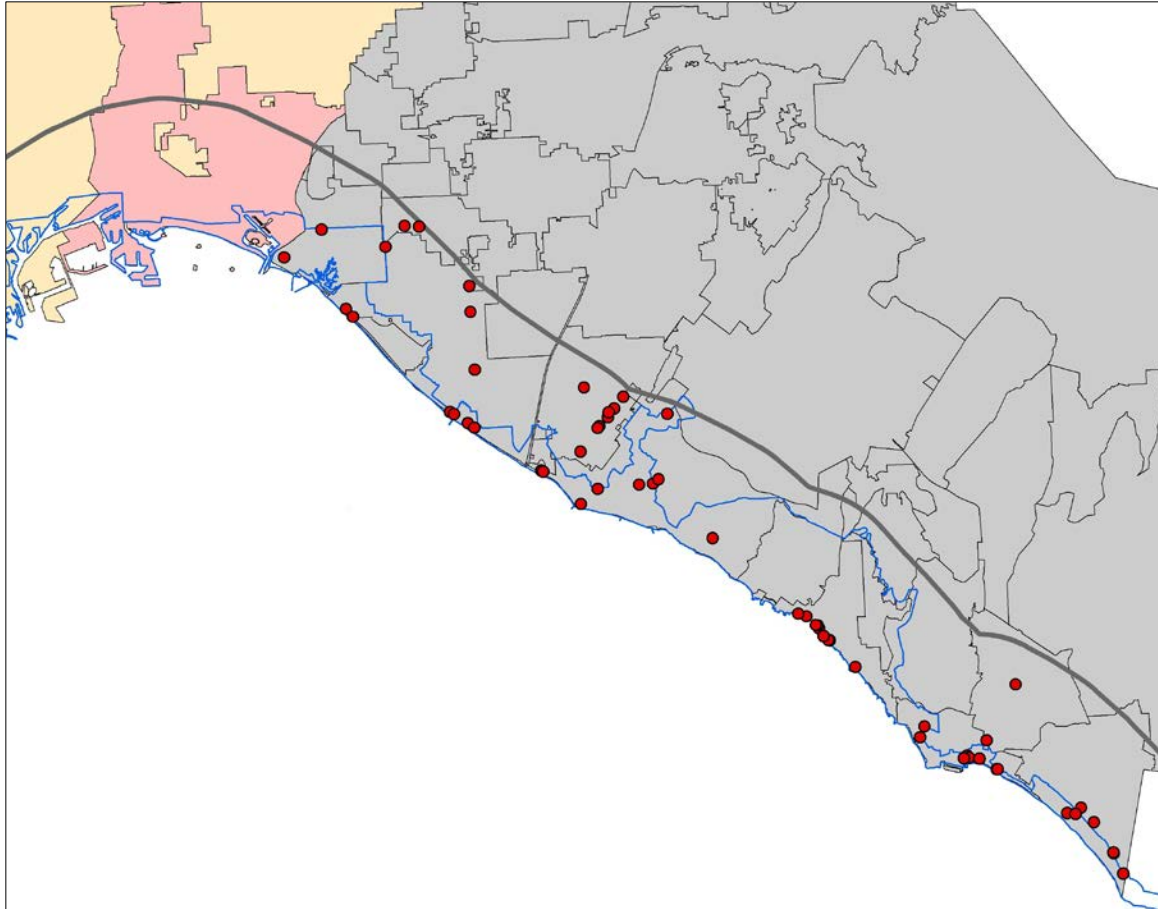


Figure B3. Orange County Hotel Map

Appendix C. AAA Hotel Ratings: Counts and Percentages

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C1. Introduction

Appendix C presents AAA rating counts and percentages for the all inventories, except California Statewide, studied in Chapter 5. For reasons explained in Chapter 5, California Statewide ADR findings were not limited to AAA-rated hotels. The tables below present counts and percentages of AAA-rated versus non-AAA-rated hotels as well as the diamond ratings (one, two, three, four, five, or not rated (NR)).

C2. AAA Rating Counts

C2.1. AAA-rated and Non-AAA-rated Hotel Counts

Table C1. Inventory AAA-rated and Non-AAA-rated Hotel Counts

Area	Coastal Zone			Out Coastal Zone, In Five-mile Zone			Five-mile Zone (Total)		
	AAA	Non- AAA	Total	AAA	Non- AAA	Total	AAA	Non- AAA	Total
California Coastal Counties	228	87	315	243	115	358	471	202	673
City of Long Beach	5	1	6	12	9	21	17	10	27
Los Angeles County	27	16	43	74	25	99	101	41	142
Orange County	26	8	34	16	6	22	42	14	56
Los Angeles County and Orange County	53	24	77	90	31	121	143	55	198

Table C2. California Coastal County AAA-rated and Non-AAA-rated Hotel Counts

Area (Counties from North to South)	Coastal Zone			Out Coastal Zone, In Five-mile Zone			Five-mile Zone (Total)		
	AAA	Non- AAA	Total	AAA	Non- AAA	Total	AAA	Non- AAA	Total
Del Norte	2	1	3	1	2	3	3	3	6
Humboldt	4	3	7	9	5	14	13	8	21
Mendocino	2	1	3	1	1	2	3	2	5
Sonoma	1	3	4	0	0	0	1	3	4
Marin	0	0	0	5	4	9	5	4	9
San Francisco	0	1	1	10	4	14	10	5	15
San Mateo	7	0	7	1	1	2	8	1	9
Santa Cruz	7	4	11	13	2	15	20	6	26
Monterey	26	5	31	26	15	41	52	20	72
San Luis Obispo	34	7	41	3	1	4	37	8	45
Santa Barbara	8	10	18	14	7	21	22	17	39
Ventura	11	1	12	3	1	4	14	2	16
Los Angeles	27	16	43	74	25	99	101	41	142
Orange	26	8	34	16	6	22	42	14	56
San Diego	73	27	100	67	41	108	140	68	208
Total	228	87	315	243	115	358	471	202	673

C2.2. AAA Diamond Rating Counts

Table C3. Inventory Coastal Zone AAA Diamond Rating Counts

Area	Coastal Zone							Out Coastal Zone, In Five-mile Zone							Five-mile Zone (Total)						
	1	2	3	4	5	NR	Total	1	2	3	4	5	NR	Total	1	2	3	4	5	NR	Total
California Coastal Counties	1	44	140	36	7	87	315	0	70	157	14	2	115	358	1	114	297	50	9	202	673
City of Long Beach	0	1	3	1	0	1	6	0	4	8	0	0	9	21	0	5	10	1	0	10	26
Los Angeles County	0	3	16	7	1	16	43	0	18	55	1	0	25	99	0	21	71	8	1	41	142
Orange County	0	4	13	5	4	8	34	0	6	9	0	1	6	22	0	10	22	5	5	14	56
Los Angeles County and Orange County	0	7	29	12	5	24	77	0	24	64	1	1	31	121	0	31	93	13	6	55	198

Table C4. California Coastal Counties Coastal Zone AAA Diamond Rating Counts

Area (Counties from North to South)	Coastal Zone							Out Coastal Zone, In Five-mile Zone							Five-mile Zone (Total)						
	1	2	3	4	5	NR	Total	1	2	3	4	5	NR	Total	1	2	3	4	5	NR	Total
Del Norte	0	0	2	0	0	1	3	0	1	0	0	0	2	3	0	1	2	0	0	3	6
Humboldt	0	2	2	0	0	3	7	0	5	4	0	0	5	14	0	7	6	0	0	8	21
Mendocino	0	1	1	0	0	1	3	0	1	0	0	0	1	2	0	2	1	0	0	2	5
Sonoma	0	0	0	1	0	3	4	0	0	0	0	0	0	0	0	0	0	1	0	3	4
Marin	0	0	0	0	0	0	0	0	0	5	0	0	4	9	0	0	5	0	0	4	9
San Francisco	0	0	0	0	0	1	1	0	6	4	0	0	4	14	0	6	4	0	0	5	15
San Mateo	0	0	5	2	0	0	7	0	0	1	0	0	1	2	0	0	6	2	0	1	9
Santa Cruz	0	4	2	1	0	4	11	0	5	7	1	0	2	15	0	9	9	2	0	6	26
Monterey	1	5	13	7	0	5	31	0	9	16	1	0	15	41	1	14	29	8	0	20	72
San Luis Obispo	0	10	24	0	0	7	41	0	0	3	0	0	1	4	0	10	27	0	0	8	45
Santa Barbara	0	0	7	1	0	10	18	0	4	9	1	0	7	21	0	4	16	2	0	17	39
Ventura	0	1	10	0	0	1	12	0	1	2	0	0	1	4	0	2	12	0	0	2	16
Los Angeles	0	3	16	7	1	16	43	0	18	55	1	0	25	99	0	21	71	8	1	41	142
Orange	0	4	13	5	4	8	34	0	6	9	0	1	6	22	0	10	22	5	5	14	56
San Diego	0	14	45	12	2	27	100	0	14	42	10	1	41	108	0	28	87	22	3	68	208
Total	1	44	140	36	7	87	315	0	70	157	14	2	115	358	1	114	297	50	9	202	673

C3. AAA Rating Percentages

C3.1. AAA-rated and Non-AAA-rated Hotel Percentages

Table C5. Inventory Coastal Zone AAA-rated and Non-AAA-rated Hotel Percentages

Area (Coastal Zone)	Total			%		
	AAA	Non-AAA	Total	AAA	Non-AAA	Total
California Coastal Counties	228	87	315	72%	28%	100%
City of Long Beach	5	1	6	83%	17%	100%
Los Angeles County	27	16	43	63%	37%	100%
Orange County	26	8	34	76%	24%	100%
Los Angeles County and Orange County	53	24	77	69%	31%	100%

Table C6. Inventory Five-Mile Zone AAA-rated and Non-AAA-rated Hotel Percentages

Area (Five-Mile Zone)	Total			%		
	AAA	Non-AAA	Total	AAA	Non-AAA	Total
California Coastal Counties	471	202	673	70%	30%	100%
City of Long Beach	17	10	27	63%	37%	100%
Los Angeles County	101	41	142	71%	29%	100%
Orange County	42	14	56	75%	25%	100%
Los Angeles County and Orange County	143	55	198	72%	28%	100%

Table C7. Coastal Counties Coastal Zone AAA-rated and non-AAA-rated Hotel Percentages

Area (Coastal Zone) (Counties from North to South)	Total			%		
	AAA	Non-AAA	Total	AAA	Non-AAA	Total
Del Norte	2	1	3	67%	33%	100%
Humboldt	4	3	7	57%	43%	100%
Mendocino	2	1	3	67%	33%	100%
Sonoma	1	3	4	25%	75%	100%
Marin	0	0	0	-	-	-
San Francisco	0	1	1	0%	100%	100%
San Mateo	7	0	7	100%	0%	100%
Santa Cruz	7	4	11	64%	36%	100%
Monterey	26	5	31	84%	16%	100%
San Luis Obispo	34	7	41	83%	17%	100%
Santa Barbara	8	10	18	44%	56%	100%
Ventura	11	1	12	92%	8%	100%
Los Angeles	27	16	43	63%	37%	100%
Orange	26	8	34	76%	24%	100%
San Diego	73	27	100	73%	27%	100%
Total	228	87	315	72%	28%	100%

Table C8. Five-Mile Zone AAA-rated and Non-AAA-rated Hotel Percentages

Area (Five-Mile Zone) (Counties from North to South)	Total			Total		
	AAA	Non-AAA	Total	AAA	Non-AAA	Total
Del Norte	3	3	6	50%	50%	100%
Humboldt	13	8	21	62%	38%	100%
Mendocino	3	2	5	60%	40%	100%
Sonoma	1	3	4	25%	75%	100%
Marin	5	4	9	56%	44%	100%
San Francisco	10	5	15	67%	33%	100%
San Mateo	8	1	9	89%	11%	100%
Santa Cruz	20	6	26	77%	23%	100%
Monterey	52	20	72	72%	28%	100%
San Luis Obispo	37	8	45	82%	18%	100%
Santa Barbara	22	17	39	56%	44%	100%
Ventura	14	2	16	88%	13%	100%
Los Angeles	101	41	142	71%	29%	100%
Orange	42	14	56	75%	25%	100%
San Diego	140	68	208	67%	33%	100%
Total	471	202	673	70%	30%	100%

C3.2. AAA Diamond Rating Percentages

Table C9. Inventory Coastal Zone AAA Diamond Rating Percentages

Area (Coastal Zone)	Total							%						
	1	2	3	4	5	NR	Total	1	2	3	4	5	NR	Total
California Coastal Counties	1	44	140	36	7	87	315	0%	14%	44%	11%	2%	28%	100%
City of Long Beach	0	1	3	1	0	1	6	0%	17%	50%	17%	0%	17%	100%
Los Angeles County	0	3	16	7	1	16	43	0%	7%	37%	16%	2%	37%	100%
Orange County	0	4	13	5	4	8	34	0%	12%	38%	15%	12%	24%	100%
Los Angeles County and Orange County	0	7	29	12	5	24	77	0%	9%	38%	16%	6%	31%	100%

Table C10. Inventory Five-Mile Zone AAA Diamond Rating Percentages

Area (Five-Mile Zone)	Total							%						
	1	2	3	4	5	NR	Total	1	2	3	4	5	NR	Total
California Coastal Counties	1	114	297	50	9	202	673	0%	17%	44%	7%	1%	30%	100%
City of Long Beach	0	5	10	1	0	10	26	0%	19%	38%	4%	0%	38%	100%
Los Angeles County	0	21	71	8	1	41	142	0%	15%	50%	6%	1%	29%	100%
Orange County	0	10	22	5	5	14	56	0%	18%	39%	9%	9%	25%	100%
Los Angeles County and Orange County	0	31	93	13	6	55	198	0%	16%	47%	7%	3%	28%	100%

Table C11. California Coastal Counties Coastal Zone AAA Diamond Rating Percentages

Area (Coastal Zone) (Counties from North to South)	Total							%						
	1	2	3	4	5	NR	Total	1	2	3	4	5	NR	Total
Del Norte	0	0	2	0	0	1	3	0%	0%	67%	0%	0%	33%	100%
Humboldt	0	2	2	0	0	3	7	0%	29%	29%	0%	0%	43%	100%
Mendocino	0	1	1	0	0	1	3	0%	33%	33%	0%	0%	33%	100%
Sonoma	0	0	0	1	0	3	4	0%	0%	0%	25%	0%	75%	100%
Marin	0	0	0	0	0	0	0	-	-	-	-	-	-	-
San Francisco	0	0	0	0	0	1	1	0%	0%	0%	0%	0%	100%	100%
San Mateo	0	0	5	2	0	0	7	0%	0%	71%	29%	0%	0%	100%
Santa Cruz	0	4	2	1	0	4	11	0%	36%	18%	9%	0%	36%	100%
Monterey	1	5	13	7	0	5	31	3%	16%	42%	23%	0%	16%	100%
San Luis Obispo	0	10	24	0	0	7	41	0%	24%	59%	0%	0%	17%	100%
Santa Barbara	0	0	7	1	0	10	18	0%	0%	39%	6%	0%	56%	100%
Ventura	0	1	10	0	0	1	12	0%	8%	83%	0%	0%	8%	100%
Los Angeles	0	3	16	7	1	16	43	0%	7%	37%	16%	2%	37%	100%
Orange	0	4	13	5	4	8	34	0%	12%	38%	15%	12%	24%	100%
San Diego	0	14	45	12	2	27	100	0%	14%	45%	12%	2%	27%	100%
Total	1	44	140	36	7	87	315	0%	14%	44%	11%	2%	28%	100%

Table C12. California Coastal Counties Five-Mile Zone AAA Diamond Rating Percentages

Area (Five-Mile Zone) (Counties from North to South)	Total							%						
	1	2	3	4	5	NR	Total	1	2	3	4	5	NR	Total
Del Norte	0	1	2	0	0	3	6	0%	17%	33%	0%	0%	50%	100%
Humboldt	0	7	6	0	0	8	21	0%	33%	29%	0%	0%	38%	100%
Mendocino	0	2	1	0	0	2	5	0%	40%	20%	0%	0%	40%	100%
Sonoma	0	0	0	1	0	3	4	0%	0%	0%	25%	0%	75%	100%
Marin	0	0	5	0	0	4	9	0%	0%	56%	0%	0%	44%	100%
San Francisco	0	6	4	0	0	5	15	0%	40%	27%	0%	0%	33%	100%
San Mateo	0	0	6	2	0	1	9	0%	0%	67%	22%	0%	11%	100%
Santa Cruz	0	9	9	2	0	6	26	0%	35%	35%	8%	0%	23%	100%
Monterey	1	14	29	8	0	20	72	1%	19%	40%	11%	0%	28%	100%
San Luis Obispo	0	10	27	0	0	8	45	0%	22%	60%	0%	0%	18%	100%
Santa Barbara	0	4	16	2	0	17	39	0%	10%	41%	5%	0%	44%	100%
Ventura	0	2	12	0	0	2	16	0%	13%	75%	0%	0%	13%	100%
Los Angeles	0	21	71	8	1	41	142	0%	15%	50%	6%	1%	29%	100%
Orange	0	10	22	5	5	14	56	0%	18%	39%	9%	9%	25%	100%
San Diego	0	28	87	22	3	68	208	0%	13%	42%	11%	1%	33%	100%
Total	1	114	297	50	9	202	673	0%	17%	44%	7%	1%	30%	100%

Appendix D. STR Trend Reports: Results and Data

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D1. Introduction

Appendix D presents the results and additional data from the STR trend reports discussed in Chapter 5. This appendix presents three sets of data:

- Hotel counts, ADR data, and multipliers from 2009 to 2015 for the inventories studied in Chapter 5,
- Changes in July and August ADR data from 2009 to 2015 and 2013 to 2015, and
- Ancillary data including the hotels added from the September 24, 2015 STR participation list and the data for the City of Long Beach – Outside Coastal Zone, Inside Five-Mile Zone inventory.

D2. 2009 to 2015 Hotel Counts, ADR Data, and Multipliers

Tables D1 through D11 show the hotel counts, ADR Data (July and August as well as annual), and multipliers from 2009 through 2015 for the inventories studied in the technical report. This data was derived from STR trend reports. As explained in Chapter 5, all inventories except for California Statewide are limited to AAA-rated hotels, which likely deflates the California Statewide ADR relative to the other inventories.

D2.1. California Statewide

Table D1. California Statewide Hotel Counts, ADR Data, and Multipliers

Year	Hotel Count (Year High)	July and August ADR				Annual ADR		Multiplier (July and August / Annual)
		July	August	Average	% Change	Annual	% Change	
2009	5,521	\$113.95	\$113.13	\$113.54		\$110.22		1.0301
2010	5,525	\$116.39	\$117.03	\$116.71	2.79%	\$110.31	0.08%	1.0580
2011	5,507	\$125.25	\$123.21	\$124.23	6.44%	\$116.61	5.71%	1.0653
2012	5,494	\$132.62	\$131.79	\$132.21	6.42%	\$123.64	6.03%	1.0693
2013	5,499	\$140.03	\$142.52	\$141.27	6.86%	\$130.67	5.69%	1.0812
2014	5,514	\$150.90	\$155.27	\$153.08	8.36%	\$140.18	7.28%	1.0920
2015	5,543	\$164.20	\$163.78	\$163.99	7.12%	\$151.21	7.86%	1.0845
Average		\$134.76	\$135.25	\$135.00	6.33%	\$121.94	4.96%	1.0660
2015 annual ADR represents January through September, and is not included in annual ADR or multiplier averages.								

D2.2. California Coastal Premium Inventories

Table D2. California Coastal Counties – Coastal Zone Hotel Counts, ADR Data, and Multiplier

Year	Hotel Count (Year High)	July and August ADR				Annual ADR		Multiplier (July and August / Annual)
		July	August	Average	% Change	Annual	% Change	
2009	223	\$193.87	\$192.01	\$192.94		\$173.75		1.1105
2010	223	\$200.66	\$198.98	\$199.82	3.57%	\$174.14	0.22%	1.1475
2011	225	\$215.74	\$205.70	\$210.72	5.45%	\$181.69	4.34%	1.1598
2012	226	\$227.77	\$221.22	\$224.50	6.54%	\$191.63	5.47%	1.1715
2013	226	\$238.00	\$233.03	\$235.51	4.91%	\$198.21	3.43%	1.1882
2014	229	\$253.22	\$254.55	\$253.88	7.80%	\$209.48	5.69%	1.2120
2015	228	\$271.22	\$258.85	\$265.04	4.39%	\$226.33	8.04%	1.1710
Average		\$228.64	\$223.48	\$226.06	5.44%	\$188.15	3.83%	1.1649
2015 annual ADR represents January through September, and is not included in annual ADR or multiplier averages.								

Table D3. California Coastal Counties – Five-Mile Zone Hotel Counts, ADR Data, and Multipliers

Year	Hotel Count (Year High)	July and August ADR				Annual ADR		Multiplier (July and August / Annual)
		July	August	Average	% Change	Annual	% Change	
2009	456	\$158.97	\$157.20	\$158.09		\$145.23		1.0885
2010	457	\$163.60	\$161.99	\$162.79	2.98%	\$144.80	-0.30%	1.1243
2011	459	\$175.49	\$167.20	\$171.35	5.26%	\$151.00	4.28%	1.1348
2012	463	\$185.22	\$179.39	\$182.31	6.40%	\$158.79	5.16%	1.1481
2013	464	\$194.28	\$189.18	\$191.73	5.17%	\$164.21	3.41%	1.1676
2014	470	\$206.72	\$206.57	\$206.64	7.78%	\$174.12	6.03%	1.1868
2015	471	\$223.76	\$213.70	\$218.73	5.85%	\$189.43	8.80%	1.1547
Average		\$186.86	\$182.18	\$184.52	5.57%	\$156.36	3.72%	1.1417
2015 annual ADR represents January through September, and is not included in annual ADR or multiplier averages.								

D2.3. Local Cost Inventories

D2.3.1. City of Long Beach

Table D4. City of Long Beach – Coastal Zone Hotel Counts, ADR Data, and Multipliers

Year	Hotel Count (Year High)	July and August ADR				Annual ADR		Multiplier (July and August / Annual)
		July	August	Average	% Change	Annual	% Change	
2009	5	\$127.52	\$125.76	\$126.64		\$132.59		0.9552
2010	5	\$131.53	\$133.93	\$132.73	4.81%	\$140.86	6.24%	0.9423
2011	5	\$147.18	\$135.08	\$141.13	6.32%	\$145.38	3.21%	0.9707
2012	5	\$152.26	\$146.53	\$149.40	5.86%	\$150.60	3.59%	0.9920
2013	5	\$152.31	\$150.41	\$151.36	1.31%	\$157.79	4.77%	0.9593
2014	5	\$170.89	\$166.38	\$168.64	11.41%	\$165.24	4.72%	1.0206
2015	5	\$202.74	\$180.34	\$191.54	13.58%	\$183.13	10.83%	1.0459
Average		\$154.92	\$148.35	\$151.63	7.22%	\$148.74	4.51%	0.9733
2015 annual ADR represents January through September, and is not included in annual ADR or multiplier averages.								

Table D5. City of Long Beach – Five-Mile Zone Hotel Counts, ADR Data, and Multipliers

Year	Hotel Count (Year High)	July and August ADR				Annual ADR		Multiplier (July and August / Annual)
		July	August	Average	% Change	Annual	% Change	
2009	17	\$110.79	\$113.48	\$112.13		\$117.39		0.9552
2010	17	\$110.18	\$112.96	\$111.57	-0.50%	\$118.22	0.71%	0.9437
2011	17	\$118.68	\$113.26	\$115.97	3.94%	\$119.95	1.46%	0.9668
2012	17	\$123.09	\$121.10	\$122.10	5.28%	\$122.88	2.45%	0.9936
2013	17	\$126.42	\$123.37	\$124.89	2.29%	\$127.68	3.90%	0.9782
2014	17	\$137.90	\$135.45	\$136.68	9.44%	\$133.31	4.41%	1.0253
2015	17	\$161.01	\$149.09	\$155.05	13.44%	\$148.30	11.25%	1.0455
Average		\$126.87	\$124.10	\$125.48	5.65%	\$123.24	2.59%	0.9771
2015 annual ADR represents January through September, and is not included in annual ADR or multiplier averages.								

D2.3.2. Los Angeles County

Table D6. Los Angeles County – Coastal Zone Hotel Counts, ADR Data, and Multipliers

Year	Hotel Count (Year High)	July and August ADR				Annual ADR		Multiplier (July and August / Annual)
		July	August	Average	% Change	Annual	% Change	
2009	26	\$190.10	\$193.76	\$191.93		\$182.21		1.0533
2010	26	\$205.92	\$209.58	\$207.75	8.24%	\$189.66	4.09%	1.0954
2011	27	\$234.87	\$231.46	\$233.17	12.23%	\$205.25	8.22%	1.1360
2012	27	\$249.23	\$246.47	\$247.85	6.30%	\$220.19	7.28%	1.1256
2013	27	\$260.57	\$269.69	\$265.13	6.97%	\$233.05	5.84%	1.1376
2014	27	\$286.17	\$298.93	\$292.55	10.34%	\$252.17	8.20%	1.1601
2015	27	\$313.47	\$315.10	\$314.29	7.43%	\$270.90	7.43%	1.1601
Average		\$248.62	\$252.14	\$250.38	8.59%	\$213.76	6.73%	1.1180
2015 annual ADR represents January through September, and is not included in annual ADR or multiplier averages.								

Table D7. Los Angeles County – Five-Mile Zone Hotel Counts, ADR Data, and Multipliers

Year	Hotel Count (Year High)	July and August ADR				Annual ADR		Multiplier (July and August / Annual)
		July	August	Average	% Change	Annual	% Change	
2009	96	\$124.30	\$126.91	\$125.61		\$122.78		1.0230
2010	96	\$128.73	\$131.97	\$130.35	3.78%	\$124.06	1.04%	1.0507
2011	97	\$143.86	\$140.88	\$142.37	9.22%	\$131.72	6.18%	1.0808
2012	97	\$152.49	\$151.23	\$151.86	6.67%	\$140.13	6.38%	1.0837
2013	98	\$158.17	\$161.38	\$159.77	5.21%	\$146.51	4.55%	1.0905
2014	101	\$174.02	\$179.03	\$176.53	10.48%	\$158.45	8.15%	1.1141
2015	101	\$198.27	\$196.56	\$197.42	11.83%	\$173.71	9.63%	1.1365
Average		\$154.26	\$155.42	\$154.84	7.87%	\$137.28	5.26%	1.0738
2015 annual ADR represents January through September, and is not included in annual ADR or multiplier averages.								

D2.3.3. Orange County

Table D8. Orange County – Coastal Zone Hotel Counts, ADR Data, and Multipliers

Year	Hotel Count (Year High)	July and August ADR				Annual ADR		Multiplier (July and August / Annual)
		July	August	Average	% Change	Annual	% Change	
2009	26	\$273.32	\$278.03	\$275.68		\$230.11		1.1980
2010	26	\$287.15	\$283.70	\$285.43	3.54%	\$228.01	-0.91%	1.2518
2011	26	\$312.59	\$303.28	\$307.93	7.89%	\$242.22	6.24%	1.2713
2012	26	\$335.61	\$327.21	\$331.41	7.62%	\$259.42	7.10%	1.2775
2013	26	\$349.11	\$356.66	\$352.89	6.48%	\$274.81	5.93%	1.2841
2014	26	\$369.62	\$401.80	\$385.71	9.30%	\$288.32	4.92%	1.3378
2015	26	\$397.51	\$400.82	\$399.16	3.49%	\$313.19	8.63%	1.2745
Average		\$332.13	\$335.93	\$334.03	6.39%	\$253.81	4.65%	1.2701
2015 annual ADR represents January through September, and is not included in annual ADR or multiplier averages.								

Table D9. Orange County – Five Mile Zone Hotel Counts, ADR Data, and Multipliers

Year	Hotel Count (Year High)	July and August ADR				Annual ADR		Multiplier (July and August / Annual)
		July	August	Average	% Change	Annual	% Change	
2009	41	\$238.90	\$244.10	\$241.50		\$203.40		1.1873
2010	41	\$249.33	\$247.69	\$248.51	2.90%	\$200.75	-1.30%	1.2379
2011	41	\$269.78	\$262.93	\$266.35	7.18%	\$212.83	6.01%	1.2515
2012	42	\$285.70	\$279.89	\$282.80	6.17%	\$224.77	5.61%	1.2582
2013	42	\$298.22	\$306.18	\$302.20	6.86%	\$238.57	6.14%	1.2667
2014	42	\$315.51	\$347.28	\$331.39	9.66%	\$250.75	5.10%	1.3216
2015	42	\$339.44	\$344.27	\$341.85	3.16%	\$271.42	8.24%	1.2595
Average		\$285.27	\$290.33	\$287.80	5.99%	\$221.84	4.31%	1.2539
2015 annual ADR represents January through September, and is not included in annual ADR or multiplier averages.								

D2.4. Los Angeles County and Orange County

Table D10. Los Angeles County and Orange County – Coastal Zone Hotel Counts, ADR Data, and Multipliers

Year	Hotel Count (Year High)	July and August ADR				Annual ADR		Multiplier (July and August / Annual)
		July	August	Average	% Change	Annual	% Change	
2009	52	\$230.93	\$235.10	\$233.01		\$205.71		1.1327
2010	52	\$245.77	\$245.94	\$245.86	5.51%	\$208.47	1.34%	1.1793
2011	53	\$272.99	\$266.69	\$269.84	9.76%	\$223.39	7.15%	1.2080
2012	53	\$291.61	\$286.08	\$288.84	7.04%	\$239.44	7.18%	1.2063
2013	53	\$304.01	\$312.35	\$308.18	6.69%	\$253.54	5.89%	1.2155
2014	53	\$327.11	\$349.39	\$338.25	9.76%	\$269.90	6.46%	1.2532
2015	53	\$354.70	\$357.15	\$355.92	5.22%	\$291.65	8.06%	1.2204
Average		\$289.59	\$293.24	\$291.42	7.33%	\$233.41	5.61%	1.1992
2015 annual ADR represents January through September, and is not included in annual ADR or multiplier averages.								

Table D11. Los Angeles County and Orange County – Five-Mile Zone Hotel Counts, ADR Data, and Multipliers

Year	Hotel Count (Year High)	July and August ADR				Annual ADR		Multiplier (July and August / Annual)
		July	August	Average	% Change	Annual	% Change	
2009	137	\$157.96	\$161.33	\$159.64		\$146.46		1.0900
2010	137	\$164.15	\$165.96	\$165.05	3.39%	\$146.58	0.08%	1.1260
2011	138	\$180.84	\$176.72	\$178.78	8.32%	\$155.54	6.11%	1.1494
2012	139	\$191.62	\$189.02	\$190.32	6.45%	\$164.99	6.07%	1.1535
2013	140	\$199.31	\$203.91	\$201.61	5.93%	\$173.55	5.19%	1.1617
2014	143	\$215.58	\$228.44	\$222.01	10.12%	\$185.56	6.92%	1.1964
2015	143	\$239.73	\$239.94	\$239.84	8.03%	\$202.41	9.08%	1.1849
Average		\$192.74	\$195.05	\$193.89	7.04%	\$162.11	4.88%	1.1462
2015 annual ADR represents January through September, and is not included in annual ADR or multiplier averages.								

D3. Change Over Time

While the tables above present percentage changes from year to year, the tables below show percentage changes from 2009 to 2015 and 2013 to 2015 for the July and August ADR.

Table D12. Coastal Zone and Statewide ADR Percentage Changes from 2009 to 2015 and 2013 to 2009

Area (Coastal Zone)	2015	2013		2009	
	July and August ADR	July and August ADR	% Change to 2015	July and August ADR	% Change to 2015
California (Statewide)	\$163.99	\$141.27	16.08%	\$113.54	44.44%
California Coastal Counties	\$265.04	\$235.51	12.54%	\$192.94	37.37%
City of Long Beach	\$191.54	\$151.36	26.55%	\$126.64	51.25%
Los Angeles County	\$314.29	\$265.13	18.54%	\$275.68	14.01%
Orange County	\$399.16	\$352.89	13.11%	\$233.01	71.30%
Los Angeles County and Orange County	\$355.92	\$308.18	15.49%	\$233.01	52.75%

Table D13. Five-Mile Zone and Statewide ADR Percentage Changes from 2009 to 2015 and 2013 to 2009

Area (Five-Mile Zone)	2015	2013		2009	
	July and August ADR	July and August ADR	% Change to 2015	July and August ADR	% Change to 2015
California (Statewide)	\$163.99	\$141.27	16.08%	\$113.54	44.44%
California Coastal Counties	\$218.73	\$191.73	14.08%	\$158.09	38.36%
City of Long Beach	\$155.05	\$124.89	24.15%	\$112.13	38.27%
Los Angeles County	\$197.42	\$159.77	23.56%	\$125.61	57.17%
Orange County	\$341.85	\$302.20	13.12%	\$241.50	41.56%
Los Angeles County and Orange County	\$239.84	\$201.61	18.96%	\$159.64	50.23%

D4. Ancillary Data

Tables D14 and D15 present ancillary data used in the collection and analysis stages discussed in Chapter 5. Table D14 shows the seven hotels added to the master list from the September 24, 2015 STR participation list of new hotels participating in STR surveys since January 1, 2014. Table D15 shows the results from the STR trend report for City of Long Beach – Outside Coastal Zone, Inside Five-Mile Zone. The data in Table D15 was disaggregated from the data for the City of Long Beach – Five-Mile Zone to produce the data for the City of Long Beach – Coastal Zone.

Table D14. STR Participating Hotels Starting January 2014 or Later (7 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (2 hotels)										
1	002	Del Norte	CZ	Holiday Inn Express Klamath Redwood National Park Area	171 Klamath Blvd.	Klamath	95548	41.529546	-124.039174	3
2	376	San Diego	CZ	Springhill Suites San Diego Oceanside Downtown	110 North Myers St.	Oceanside	92054	33.193953	-117.381674	3
Outside Coastal Zone, Inside Five-Mile Zone (5 hotels)										
1	227	Los Angeles	FZ	Hampton Inn Los Angeles International Airport Hawthorne	11430 Acacia Ave.	Hawthorne	90250	33.930668	-118.350660	3
2	272	Los Angeles	FZ	Residence Inn Los Angeles Redondo Beach	2420 Marine Ave.	Redondo Beach	90278	33.892991	-118.365532	3
3	273	Los Angeles	FZ	Hilton Garden Inn Los Angeles Redondo Beach	2410 Marine Ave.	Redondo Beach	90278	33.893820	-118.366599	3
4	469	San Diego	FZ	Hampton Inn San Diego Mission Valley	2151 Hotel Cir S	San Diego	92108	32.758259	-117.182106	3
5	470	San Diego	FZ	Holiday Inn Express & Suites San Diego Hotel Circle	635 Hotel Cir S	San Diego	92108	32.759889	-117.169466	3

Table D15. City of Long Beach - Outside Coastal Zone, Inside Five-Mile Zone Hotel Counts, ADR Data, and Multipliers

Year	Hotel Count (Year High)	July and August ADR				Annual ADR		Multiplier (July and August / Annual)
		July	August	Average	% Change	Annual	% Change	
2009	12	\$103.82	\$108.36	\$106.09		\$111.06		0.9553
2010	12	\$101.28	\$104.22	\$102.75	-3.15%	\$108.79	-2.04%	0.9445
2011	12	\$106.81	\$104.17	\$105.49	2.66%	\$109.35	0.51%	0.9647
2012	12	\$110.94	\$110.51	\$110.72	4.96%	\$111.34	1.82%	0.9945
2013	12	\$115.63	\$112.10	\$113.87	2.84%	\$115.14	3.41%	0.9889
2014	12	\$124.16	\$122.57	\$123.36	8.34%	\$120.00	4.22%	1.0280
2015	12	\$143.63	\$136.06	\$139.84	13.36%	\$133.79	11.49%	1.0453
Average		\$115.18	\$114.00	\$114.59	4.84%	\$112.61	1.59%	0.9793
2015 annual ADR represents January through September, and is not included in annual ADR or multiplier averages.								

Appendix E. CCC In-Lieu Fee Trigger Formula: Inventories and Application

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E1. Introduction

Appendix E presents the inventories and applications of the CCC in-lieu fee trigger formula as discussed in Chapter 5. Table E1 below shows summary counts of the inventories by AAA rating (limited one or two-diamond hotels, as explained in Chapter 3) and the 2014 multiplier applied to each inventories average 2015 AAA estimated annual ADR to produce the estimated July and August 2015 ADR. As explained in Chapter 5, the 2014 multipliers were used because the complete 12-month 2015 ADR figures needed to generate a 2015 multiplier are not yet available.

Table E1. CCC In-Lieu Fee Trigger Inventory Summary and Multipliers

Political	Distance from the Coast	AAA 1 or 2-Diamond Hotels				2014 Multiplier
		Total	Below CA ADR	Above CA ADR	Rates not Published	
City of Long Beach	Coastal Zone	1	0	1	0	1.0206
City of Long Beach	Five-Mile Zone	5	1	3	1	1.0253
Los Angeles County	Coastal Zone	3	1	1	1	1.1601
Los Angeles County	Five-Mile Zone	21	9	8	4	1.1141
Orange County	Coastal Zone	4	1	3	0	1.3216
Orange County	Five-Mile Zone	10	5	4	1	1.3378
Los Angeles County and Orange County	Coastal Zone	7	2	4	1	1.2532
Los Angeles County and Orange County	Five-Mile Zone	31	14	12	5	1.1964
None of the above inventories include 1-Diamond hotels.						

The tables below show the following:

- **Inventories:** The one or two-diamond AAA-rated hotels, the application of the 2014 multiplier, and the Local Low ADR produced by hotels falling below the July and August 2015 Statewide ADR of \$163.99.
- **Application:** The application of the CCC's in-lieu fee trigger formula to the each inventories Local Low ADR to produce the Local High Cost Point.

E2. CCC In-lieu Fee Trigger Inventories

E2.1. City of Long Beach

Table E2. City of Long Beach – Coastal Zone CCC In-Lieu Fee Trigger Inventory (1 hotel)

No.	ID	County	Zone	Business Name	City	Zip	AAA	AAA 2015 Cost Estimate			Est. July and August 2015 ADR	
								Low	High	Avg.	2014 Multiplier	Est. ADR
Above 2015 July and August Statewide ADR (\$163.99) (1 hotel)												
1	192	Los Angeles	CZ	Best Western Golden Sails Htl	Long Beach	90803	2	\$165.00	\$175.00	\$170.00	1.0206	\$173.50

Table E3. City of Long Beach – Five-Mile Zone CCC In-Lieu Fee Trigger Inventory (5 hotels)

No.	ID	County	Zone	Business Name	City	Zip	AAA	AAA 2015 Cost Estimate			Est. July and August 2015 ADR	
								Low	High	Avg.	2014 Multiplier	Est. ADR
Below 2015 July and August Statewide ADR (\$163.99) (1 hotel)												
1	243	Los Angeles	FZ	Quality Inn Long Beach Airport	Long Beach	90755	2	\$79.00	\$139.00	\$109.00	1.0253	\$111.76
Local Low ADR											\$111.76	
Above 2015 July and August Statewide ADR (\$163.99) (3 hotels)												
1	192	Los Angeles	CZ	Best Western Golden Sails Htl	Long Beach	90803	2	\$165.00	\$175.00	\$170.00	1.0253	\$174.30
2	239	Los Angeles	FZ	Best Western of Long Beach	Long Beach	90813	2	\$129.00	\$229.00	\$179.00	1.0253	\$183.53
3	238	Los Angeles	FZ	Travelodge Long Beach Convention Center	Long Beach	90802	2	\$119.00	\$259.00	\$189.00	1.0253	\$193.78
2015 AAA Rates Not Published (1 hotel)												
1	242	Los Angeles	FZ	Extended Stay America Los Angeles - Long Beach Airport	Long Beach	90815	2	NA	NA	NA	NA	NA

E2.2. Los Angeles County

Table E4. Los Angeles County – Coastal Zone CCC In-Lieu Fee Trigger Inventory (3 hotels)

No.	ID	County	Zone	Business Name	City	Zip	AAA	AAA 2015 Cost Estimate			Est. July and August 2015 ADR	
								Low	High	Avg.	2014 Multiplier	Est. ADR
Below 2015 July and August Statewide ADR (\$163.99) (1 hotel)												
1	203	Los Angeles	CZ	Ramada Limited Redondo Beach	Redondo Beach	90277	2	\$74.00	\$179.00	\$126.50	1.1601	\$146.75
Local Low ADR												\$146.75
Above 2015 July and August Statewide ADR (\$163.99) (1 hotel)												
1	192	Los Angeles	CZ	Best Western Golden Sails Htl	Long Beach	90803	2	\$165.00	\$175.00	\$170.00	1.1601	\$197.22
2015 AAA Rates Not Published (1 hotel)												
1	213	Los Angeles	CZ	Ocean View Hotel	Santa Monica	90401	2	NA	NA	NA	NA	NA

Table E5. Los Angeles County – Five-Mile Zone CCC In-Lieu Fee Trigger Inventory (21 hotels)

No.	ID	County	Zone	Business Name	City	Zip	AAA	AAA 2015 Cost Estimate			Est. July and August 2015 ADR	
								Low	High	Avg.	2014 Multiplier	Est. ADR
Below 2015 July and August Statewide ADR (\$163.99) (9 hotels)												
1	253	Los Angeles	FZ	Super8 - Los Angeles International Airport Hotel	Los Angeles	90045	2	\$74.00	\$100.00	\$87.00	1.1141	\$96.92
2	243	Los Angeles	FZ	Quality Inn Long Beach Airport	Long Beach	90755	2	\$79.00	\$139.00	\$109.00	1.1141	\$121.43
3	233	Los Angeles	FZ	Days Inn LAX Airport South Bay - Lawndale	Lawndale	90260	2	\$70.00	\$170.00	\$120.00	1.1141	\$133.69
4	280	Los Angeles	FZ	Travelodge Torrance/Redondo Beach	Torrance	90501	2	\$75.00	\$175.00	\$125.00	1.1141	\$139.26
5	203	Los Angeles	CZ	Ramada Limited Redondo Beach	Redondo Beach	90277	2	\$74.00	\$179.00	\$126.50	1.1141	\$140.93
6	259	Los Angeles	FZ	Super 8 Los Angeles Culver City	Los Angeles	90066	2	\$105.00	\$159.00	\$132.00	1.1141	\$147.06
7	217	Los Angeles	FZ	Travelodge Los Angeles Culver City	Culver City	90232	2	\$120.00	\$145.00	\$132.50	1.1141	\$147.61
8	285	Los Angeles	FZ	Ramada Inn Torrance - South Bay	Torrance	90505	2	\$74.00	\$199.00	\$136.50	1.1141	\$152.07
9	289	Los Angeles	FZ	BEST WESTERN Los Angeles Worldport Hotel	Wilmington	90803	2	\$100.00	\$174.00	\$137.00	1.1141	\$152.63
Local Low ADR												\$136.84
Above 2015 July and August Statewide ADR (\$163.99) (8 hotels)												
1	277	Los Angeles	FZ	Travelodge Santa Monica Pico Blvd	Santa Monica	90405	2	\$135.00	\$199.00	\$167.00	1.1141	\$186.05
2	271	Los Angeles	FZ	Best Western Redondo Beach Gal	Redondo Beach	90278	2	\$89.00	\$249.00	\$169.00	1.1141	\$188.28
3	192	Los Angeles	CZ	Best Western Golden Sails Htl	Long Beach	90803	2	\$165.00	\$175.00	\$170.00	1.1141	\$189.39
4	275	Los Angeles	FZ	Comfort Inn Near Santa Monica Pier	Santa Monica	90404	2	\$134.00	\$214.00	\$174.00	1.1141	\$193.85
5	239	Los Angeles	FZ	Best Western of Long Beach	Long Beach	90813	2	\$129.00	\$229.00	\$179.00	1.1141	\$199.42
6	238	Los Angeles	FZ	Travelodge Long Beach Convention Center	Long Beach	90802	2	\$119.00	\$259.00	\$189.00	1.1141	\$210.56
7	260	Los Angeles	FZ	Rodeway Inn Culver City	Los Angeles	90066	2	\$95.00	\$300.00	\$197.50	1.1141	\$220.03
8	226	Los Angeles	FZ	Towneplace Suites by Marriott Los Angeles LAX/Manhattan Beach	Hawthorne	90260	2	\$139.00	\$269.00	\$204.00	1.1141	\$227.27

No.	ID	County	Zone	Business Name	City	Zip	AAA	AAA 2015 Cost Estimate			Est. July and August 2015 ADR	
								Low	High	Avg.	2014 Multiplier	Est. ADR
2015 AAA Rates Not Published (4 hotels)												
1	213	Los Angeles	CZ	Ocean View Hotel	Santa Monica	90401	2	NA	NA	NA	NA	NA
2	223	Los Angeles	FZ	Extended Stay America Los Angeles LAX Airport El Segundo	El Segundo	90245	2	NA	NA	NA	NA	NA
3	242	Los Angeles	FZ	Extended Stay America Los Angeles - Long Beach Airport	Long Beach	90815	2	NA	NA	NA	NA	NA
4	256	Los Angeles	FZ	Extended Stay America Los Angeles - LAX Airport	Los Angeles	90045	2	NA	NA	NA	NA	NA

E2.3. Orange County

Table E6. Orange County – Coastal Zone CCC In-Lieu Fee Trigger Inventory (5 hotels)

No.	ID	County	Zone	Business Name	City	Zip	AAA	AAA 2015 Cost Estimate			Est. July and August 2015 ADR	
								Low	High	Avg.	2014 Multiplier	Est. ADR
Below 2015 July and August Statewide ADR (\$163.99) (1 hotel)												
1	312	Orange	CZ	Rodeway Inn San Clemente Beach	San Clemente	92672	2	\$80.00	\$100.00	\$90.00	1.3216	\$118.95
Local Low ADR												\$118.95
Above 2015 July and August Statewide ADR (\$163.99) (3 hotels)												
1	311	Orange	CZ	Best Western Casablanca Inn	San Clemente	92672	2	\$90.00	\$230.00	\$160.00	1.3216	\$211.46
2	306	Orange	CZ	Newport Channel Inn	Newport Beach	92663	2	\$79.00	\$249.00	\$164.00	1.3216	\$216.75
3	296	Orange	CZ	BEST WESTERN Huntington Beach Inn	Huntington Beach	92648	2	\$100.00	\$250.00	\$175.00	1.3216	\$231.29

Table E7. Orange County – Five-Mile Zone CCC In-Lieu Fee Trigger Inventory (10 hotels)

No.	ID	County	Zone	Business Name	City	Zip	AAA	AAA 2015 Cost Estimate			Est. July and August 2015 ADR	
								Low	High	Avg.	2014 Multiplier	Est. ADR
Below 2015 July and August Statewide ADR (\$163.99) (5 hotels)												
1	312	Orange	CZ	Rodeway Inn San Clemente Beach	San Clemente	92672	2	\$80.00	\$100.00	\$90.00	1.3378	\$120.40
2	328	Orange	FZ	San Clemente Beach Travelodge	San Clemente	92672	2	\$60.00	\$120.00	\$90.00	1.3378	\$120.40
3	331	Orange	FZ	Best Western Westminster Inn	Westminster	92683	2	\$85.00	\$120.00	\$102.50	1.3378	\$137.12
4	318	Orange	FZ	Travelodge Costa Mesa Newport Beach	Costa Mesa	92627	2	\$69.00	\$169.00	\$119.00	1.3378	\$159.20
5	323	Orange	FZ	Howard Johnson Huntington Beach	Huntington Beach	92647	2	\$89.00	\$149.00	\$119.00	1.3378	\$159.20
Local Low ADR												\$139.26
Above 2015 July and August Statewide ADR (\$163.99) (4 hotels)												
1	311	Orange	CZ	Best Western Casablanca Inn	San Clemente	92672	2	\$90.00	\$230.00	\$160.00	1.3378	\$214.05
2	306	Orange	CZ	Newport Channel Inn	Newport Beach	92663	2	\$79.00	\$249.00	\$164.00	1.3378	\$219.40
3	296	Orange	CZ	BEST WESTERN Huntington Beach Inn	Huntington Beach	92648	2	\$100.00	\$250.00	\$175.00	1.3378	\$234.11
4	324	Orange	FZ	Comfort Suites Huntington Beach	Huntington Beach	92647	2	\$79.00	\$299.00	\$189.00	1.3378	\$252.84
2015 AAA Rates Not Published (1 hotel)												
1	316	Orange	FZ	Super 8 Costa Mesa Newport Beach	Costa Mesa	92626	2	NA	NA	NA	NA	NA

E2.4. Los Angeles County and Orange County

Table E8. Los Angeles County and Orange County – Coastal Zone CCC In-Lieu Fee Trigger Inventory (7 hotels)

No.	ID	County	Zone	Business Name	City	Zip	AAA	AAA 2015 Cost Estimate			Est. July and August 2015 ADR	
								Low	High	Avg.	2014 Multiplier	Est. ADR
Below 2015 July and August Statewide ADR (\$163.99) (2 hotels)												
1	312	Orange	CZ	Rodeway Inn San Clemente Beach	San Clemente	92672	2	\$80.00	\$100.00	\$90.00	1.2532	\$112.79
2	203	Los Angeles	CZ	Ramada Limited Redondo Beach	Redondo Beach	90277	2	\$74.00	\$179.00	\$126.50	1.2532	\$158.53
Local Low ADR												\$155.26
Above 2015 July and August Statewide ADR (\$163.99) (4 hotels)												
1	311	Orange	CZ	Best Western Casablanca Inn	San Clemente	92672	2	\$90.00	\$230.00	\$160.00	1.2532	\$200.52
2	306	Orange	CZ	Newport Channel Inn	Newport Beach	92663	2	\$79.00	\$249.00	\$164.00	1.2532	\$205.53
3	192	Los Angeles	CZ	Best Western Golden Sails Htl	Long Beach	90803	2	\$165.00	\$175.00	\$170.00	1.2532	\$213.05
4	296	Orange	CZ	BEST WESTERN Huntington Beach Inn	Huntington Beach	92648	2	\$100.00	\$250.00	\$175.00	1.2532	\$219.31
2015 AAA Rates Not Published (1 hotel)												
1	213	Los Angeles	CZ	Ocean View Hotel	Santa Monica	90401	2	NA	NA	NA	NA	NA

Table E9. Los Angeles County and Orange County – Five-Mile CCC In-Lieu Fee Trigger Inventory (21 hotels)

No.	ID	County	Zone	Business Name	City	Zip	AAA	AAA 2015 Cost Estimate			Est. July and August 2015 ADR	
								Low	High	Avg.	2014 Multiplier	Est. ADR
Below 2015 July and August Statewide ADR (\$163.99) (9 hotels)												
1	253	Los Angeles	FZ	Super8 - Los Angeles International Airport Hotel	Los Angeles	90045	2	\$74.00	\$100.00	\$87.00	1.1141	\$96.92
2	243	Los Angeles	FZ	Quality Inn Long Beach Airport	Long Beach	90755	2	\$79.00	\$139.00	\$109.00	1.1141	\$121.43
3	233	Los Angeles	FZ	Days Inn LAX Airport South Bay - Lawndale	Lawndale	90260	2	\$70.00	\$170.00	\$120.00	1.1141	\$133.69
4	280	Los Angeles	FZ	Travelodge Torrance/Redondo Beach	Torrance	90501	2	\$75.00	\$175.00	\$125.00	1.1141	\$139.26
5	203	Los Angeles	CZ	Ramada Limited Redondo Beach	Redondo Beach	90277	2	\$74.00	\$179.00	\$126.50	1.1141	\$140.93
6	259	Los Angeles	FZ	Super 8 Los Angeles Culver City	Los Angeles	90066	2	\$105.00	\$159.00	\$132.00	1.1141	\$147.06
7	217	Los Angeles	FZ	Travelodge Los Angeles Culver City	Culver City	90232	2	\$120.00	\$145.00	\$132.50	1.1141	\$147.61
8	285	Los Angeles	FZ	Ramada Inn Torrance - South Bay	Torrance	90505	2	\$74.00	\$199.00	\$136.50	1.1141	\$152.07
9	289	Los Angeles	FZ	BEST WESTERN Los Angeles Worldport Hotel	Wilmington	90803	2	\$100.00	\$174.00	\$137.00	1.1141	\$152.63
Local Low ADR												\$136.84
Above 2015 July and August Statewide ADR (\$163.99) (8 hotels)												
1	277	Los Angeles	FZ	Travelodge Santa Monica Pico Blvd	Santa Monica	90405	2	\$135.00	\$199.00	\$167.00	1.1141	\$186.05
2	271	Los Angeles	FZ	Best Western Redondo Beach Gal	Redondo Beach	90278	2	\$89.00	\$249.00	\$169.00	1.1141	\$188.28
3	192	Los Angeles	CZ	Best Western Golden Sails Htl	Long Beach	90803	2	\$165.00	\$175.00	\$170.00	1.1141	\$189.39
4	275	Los Angeles	FZ	Comfort Inn Near Santa Monica Pier	Santa Monica	90404	2	\$134.00	\$214.00	\$174.00	1.1141	\$193.85
5	239	Los Angeles	FZ	Best Western of Long Beach	Long Beach	90813	2	\$129.00	\$229.00	\$179.00	1.1141	\$199.42

No.	ID	County	Zone	Business Name	City	Zip	AAA	AAA 2015 Cost Estimate			Est. July and August 2015 ADR	
								Low	High	Avg.	2014 Multiplier	Est. ADR
6	238	Los Angeles	FZ	Travelodge Long Beach Convention Center	Long Beach	90802	2	\$119.00	\$259.00	\$189.00	1.1141	\$210.56
7	260	Los Angeles	FZ	Rodeway Inn Culver City	Los Angeles	90066	2	\$95.00	\$300.00	\$197.50	1.1141	\$220.03
8	226	Los Angeles	FZ	Towneplace Suites by Marriott Los Angeles LAX/Manhattan Beach	Hawthorne	90260	2	\$139.00	\$269.00	\$204.00	1.1141	\$227.27
2015 AAA Rates Not Published (4 hotels)												
1	213	Los Angeles	CZ	Ocean View Hotel	Santa Monica	90401	2	NA	NA	NA	NA	NA
2	223	Los Angeles	FZ	Extended Stay America Los Angeles LAX Airport El Segundo	El Segundo	90245	2	NA	NA	NA	NA	NA
3	242	Los Angeles	FZ	Extended Stay America Los Angeles - Long Beach Airport	Long Beach	90815	2	NA	NA	NA	NA	NA
4	256	Los Angeles	FZ	Extended Stay America Los Angeles - LAX Airport	Los Angeles	90045	2	NA	NA	NA	NA	NA

E3. Application of CCC In-Lieu Trigger Formula

The formula applied in Table E10 below is examined in detail in Chapter 3.

Table E10. Application of CCC In-Lieu Fee Trigger Formula

Political	Distance from the Coast	July and August 2015 ADR		Local Quotient (Local Low ADR / Statewide ADR)	Cost Range ((1 – Local Quotient) * Statewide ADR)	Local Cost High Point (Statewide ADR + Cost Range)	Local Cost Low Point (Statewide ADR – Cost Range)
		Statewide ADR	Est. Local Low ADR				
City of Long Beach	Coastal Zone	\$163.99	NA	NA	NA	NA	NA
City of Long Beach	Five-Mile Zone		\$111.76	0.68	\$52.24	\$216.23	\$111.76
Los Angeles County	Coastal Zone		\$146.75	0.89	\$17.24	\$181.23	\$146.75
Los Angeles County	Five-Mile Zone		\$136.84	0.83	\$27.15	\$191.14	\$136.84
Orange County	Coastal Zone		\$118.95	0.73	\$45.04	\$209.04	\$118.95
Orange County	Five-Mile Zone		\$139.26	0.85	\$24.73	\$188.72	\$139.26
Los Angeles County and Orange County	Coastal Zone		\$155.26	0.95	\$8.73	\$172.73	\$155.26
Los Angeles County and Orange County	Five-Mile Zone		\$138.96	0.85	\$25.03	\$189.02	\$138.96

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
1	This comment is introductory in nature and formally submits an appeal of the Planning Commission's approval of the Breakers Hotel Project.	This comment has been noted and no response required.
2	The appellant expresses concern related to the use of a Categorical Exemption for the project and the Project's compliance with the Long Beach Municipal Code.	This comment summarizes the detailed comments to follow. Refer to subsequent responses to comments related to the applicability of a Categorical Exemption and the Project's compliance with required findings.
3	The comment acknowledges that written comments were provided (Exhibit A) prior to the Planning Commission hearing. The comment states that verbal responses to the written letter were made at the Planning Commission hearing without substantial evidence. The appellant requests that the City Council reverse the Planning Commission's decision and withhold all entitlements until a CEQA-compliant IS and EIR or MND is prepared for the Project.	The written correspondence was received by staff hours prior to the meeting. In the absence of time to prepare written responses to the letter, verbal responses were provided during the hearing. This response to comment matrix and the contents of Attachment J of this City Council letter provide substantial evidence to support the verbal responses supporting the use of a Categorical Exemption.
4	This comment states that the filed appeal is made to exhaust all remedies under the Public Resources Code.	This comment has been noted and no response required.
5	The appellant challenges the Project's qualification for a Categorical Exemption and consistency with the required findings. The comment further	This comment summarizes the detailed comments to follow related to the use of a Categorical Exemption for CEQA compliance. Refer to subsequent responses to comments related to the applicability of a Categorical Exemption. Refer to subsequent detailed

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
	requests the preparation of an EIR or MND.	<p>responses to comments:</p> <ul style="list-style-type: none"> • Responses to Comments 11 through 15; and • Responses to Comments 30 through 57.
6	This comment states that the required findings for the entitlements cannot be made.	<p>This comment summarizes the detailed comments to follow related to the Project's consistency with required findings. Refer to subsequent responses to comments related to the Project's compliance with required findings. Refer to subsequent responses to comments:</p> <ul style="list-style-type: none"> • Responses to Comments 16 through 20; • Responses to Comments 40 through 43; and • Responses to comments 58 through 69.
7	This comment provides a summary of the appellants standing and aggrieved status.	This comment has been noted and no response required.
8	This comment opines that the Planning Commission abused its discretion by failing to prepare a EIR or MND under CEQA requirements and failing to make necessary findings for the requested entitlements. This comment references the fair argument standard and court rulings.	<p>The proposed Project is the reuse of an existing building. The proposed use of the building would be consistent with the original (historical) use of the building, a hotel with food and beverage and accessory uses. The proposed construction associated with the change of use is limited to an addition to accommodate a gurney elevator and code compliant stairwell, accessory outdoor uses on rooftops, and interior remodeling, exterior building renovation, and site improvements in Victory Park. All changes to the building have been found to be consistent with the Secretary of the Interior's (SOI) Standards for Rehabilitation. Furthermore, the reuse of the Breakers Hotel as a hotel or residential use is explicitly noted in PD-6 and the LCP.</p> <p>Categorical Exemptions apply to classes of projects that have been determined not to have a significant effect on the environment and are considered "exempt" from CEQA. The adaptive reuse of an</p>

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
		<p>existing historic building would result in less impact than the potential impacts that would be associated with the construction of a new building at this site consistent with the PD-6 and LCP standards. A traffic study was prepared to demonstrate that the reuse of the existing building would not result in significant impacts. All rehabilitation and renovation plans were approved by the Cultural Heritage Commission and determined to be consistent with SOI Standards for Rehabilitation. The overall scope of work include the adaptive reuse of an existing building, the addition of building area to accommodate a gurney elevator and stairwell, Victory Park improvements, and accessory rooftop terraces on a 0.49-acre site would qualify for a Categorical Exemption under multiple classes included in Article 19 of the CEQA Guidelines.</p> <p>Refer to subsequent detailed responses to comments related to the applicability of a Categorical Exemption for the proposed Project.</p>
9	This comment asserts that the project is subject to exceptions to the exemptions subject to Categorical Exemptions.	<p>Refer to subsequent responses to more detailed appellant comments referring to exceptions to exemptions:</p> <ul style="list-style-type: none"> • Responses to Comments 55 through 57.
10	This comment states that the Planning Commission failed to make necessary findings for the requested entitlements and that the project's design and use are not consistent with relevant planning documents.	<p>This comment summarizes the detailed comments to follow related to the Project's consistency with required findings. Refer to subsequent responses to comments related to the Project's compliance with required findings. Refer to subsequent responses to comments:</p> <ul style="list-style-type: none"> • Responses to Comments 16 through 20; • Responses to Comments 40 through 43; and • Responses to comments 58 through 69.
11	This comment refers to comments raised in Exhibit A. This comment	Refer to responses to comments referred to in Exhibit A submitted prior to the Planning Commission

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
	asserts that the Project does not qualify for any categorical exemption. The comment further states that the project does not qualify for the use of a Class 1 categorical exemption because the project is a radical change in use, which would not be considered “minor” or “negligible”.	<p>hearing on November 15, 2018:</p> <ul style="list-style-type: none"> • Responses to Comments 22 through 71. <p>The Class 1 exemption would apply for the proposed Project because the building would returned to the original use of the building. The number of rooms in the proposed hotel would be less than the previously approved 230-unit congregate care facility. Restaurant and venue space previously existed within the building and would be reconfigured within the building envelope. The addition of a stairwell and elevator is required by Building and Fire Codes to accommodate the reuse of the building. The reuse of the building would not represent a radical change in use because the building use would return to the original hotel use. A traffic study was prepared to demonstrate that the change of use would not result in significant traffic impacts.</p>
12	This comment states that a Class 3 Categorical exemption would not apply because the Project does not involve the construction or conversion of new, small facilities or structures and involves significant building modifications.	The Class 3 exemption would directly apply to the construction of small structures on the rooftop areas, which include a rooftop terrace and restroom and rooftop pool areas.
13	This comment states that the project does not qualify for a Class 31 categorical exemption because the Project involves a radical change in use, which is much more than a simple restoration of an historic landmark.	The SOI Standards for Rehabilitation address the historical use of buildings proposed for rehabilitation or renovation. The project would return the building to its original use as a hotel. The proposed renovation includes restoration of building materials and modifications that were made to accommodate the previous congregate care facility. The stairwell addition is required by Building and Fire Codes. The return to the original building use, restoration of the building, and building modifications were determined to be consistent with the SOI Standards. The

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
		rehabilitation and restoration of the building for the proposed Project would enhance the use of a vacant historic landmark building.
14	This comment states that the project does not qualify for a Class 32 categorical exemption because the Project is inconsistent with the applicable general plan and because it cannot be readily perceived that the Project will not result in any significant effects related to traffic, noise, air quality or water quality.	<p>This comment summarizes the detailed comments to follow related to the Project's consistency with Class 32 Categorical Exemption. Supplemental analysis was incorporated into Attachment J of the City Council letter to confirm use of this exemption. Refer to subsequent responses to comments related to the Project's compliance with the Class 32 Exemption. Refer to subsequent responses to comments:</p> <ul style="list-style-type: none"> • Responses to Comments 40 through 54.
15	This comment states that exceptions-to-the-exemptions apply due to significant cumulative impacts and impacts on historical resources.	<p>Refer to subsequent responses to more detailed appellant comments referring to exceptions to exemptions:</p> <ul style="list-style-type: none"> • Responses to Comments 55 through 57.
16	This comment objects to the Planning Commission's approval of the Entitlements because the required findings cannot be made. This comment further states that the required Site Plan Review findings cannot be made because the Project is not "harmonious, consistent, and complete within itself" due to potential disruptive interactions between the Project and abutting park.	The driveway in Victory Park is an existing condition. The proposed modifications to Victory Park would reduce vehicle-pedestrian conflicts at Ocean Boulevard by relocating a vehicle driveway to Collins Way. The enhancements to Victory Park would improve the overall site design and passive park amenities.
17	This comment states that the required findings cannot be made because the Project proposes to remove significant mature trees	The proposed landscape plan for Victory Park is a conceptual design. The existing trees are proposed to be reused in the final landscape design.

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
	from the site.	
18	This comment states that the required findings cannot be made because the Project conflicts with elements of the Long Beach General Plan and the Downtown Shoreline Area Plan to provide affordable visitor options.	<p>A technical study related to the evaluation of low cost visitor accommodations in the City of Long Beach has been added to Attachment J for reference.</p> <p>Refer to subsequent responses to more detailed appellant comments referring to low cost visitor accommodations:</p> <ul style="list-style-type: none"> • Responses to Comments 41 through 43; and • Responses to Comments 64 through 69;
19	This comment states that the required findings cannot be made because the applicant does not show sufficient evidence that the Project may be granted an alcohol license in an area that is already oversaturated with on-sale alcohol licenses as reported by the Department of Alcohol Beverage Control.	There are existing on-premises alcohol licenses active for the Breakers Building. Because the proposed CUP is not for a new license, the concentration of alcohol licenses in a census tract would not apply. The CUP is to document the floor plan for venue spaces that are already covered by the existing alcohol licenses.
20	This comment states that the required findings for the LCDP cannot be made because the Project does not provide low-cost visitor accommodations and therefore conflicts with the public access and recreation policies of Chapter 3 of the Coastal Act.	<p>A technical study related to the evaluation of low cost visitor accommodations in the City of Long Beach has been added to Attachment J for reference.</p> <p>Refer to subsequent responses to more detailed appellant comments referring to low cost visitor accommodations:</p> <ul style="list-style-type: none"> • Responses to Comments 41 through 43; and • Responses to Comments 64 through 69;
21	This comment states that the appellants reserve the right to supplement these comments and hearings and proceedings for this Project.	This comment has been noted. The appellant has been included on all public noticing.

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Comment Number	Comment Summary	Response
	This comment further requests that the Appellants are included on the notice list for all notices of CEQA actions, Appeal hearings, and any approvals, Project CEQA determinations, or public hearings to be held on the Project.	
22	This letter was submitted via email on November 15, 2018. This comment is introductory in nature and formally submits written comments regarding the Breakers Hotel Project. The commenter expresses concern related to the Project's compliance with CEQA and the Long Beach Municipal Code.	This comment has been noted and no response required.
23	This comment opines that the Project does not qualify for any of the four different classes of categorical exemption Applicant seeks (Class 1, Class 3, Class 31, and Class 32) due to the proposed dramatic change in use.	The Class 1 exemption would apply for the proposed Project because the building would be returned to the original use of the building. The number of rooms in the proposed hotel would be less than the previously approved 230-unit congregate care facility. Restaurant and venue space previously existed within the building and would be reconfigured within the building envelope. The addition of a stairwell and elevator is required by Building and Fire Codes to accommodate the reuse of the building. The reuse of the building would not represent a radical change in use because the building use would return to the original hotel use. A traffic study was prepared to demonstrate that the change of use would not result in significant traffic impacts. Supplemental analysis is included in Attachment J to demonstrate that no traffic or air quality impacts would occur with the reuse of the building as a hotel (original use).

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Comment Number	Comment Summary	Response
24	This comment states that the Traffic Impact Study is too narrow to have accurately studied the traffic impacts of the proposed Project.	The traffic study was prepared consistent with the City of Long Beach traffic impact analysis guidelines. An expanded cumulative projects list was analyzed in a supplemental traffic analysis included in Attachment J. No significant traffic impacts would occur under the expanded cumulative projects analysis.
25	This comment expresses concern about the Project's impacts on historical resources and the building's eligibility for the California and National Registers of Historic Places.	The SOI Standards for Rehabilitation address the historical use of buildings proposed for rehabilitation or renovation. The project would return the building to its original use as a hotel. The proposed renovation includes restoration of building materials and modifications that were made to accommodate the previous congregate care facility. The stairwell addition is required by Building and Fire Codes. The return to the original building use, restoration of the building, and building modifications were determined to be consistent with the SOI Standards. The rehabilitation and restoration of the building for the proposed Project would enhance the use of a vacant historic landmark building.
26	This comment opines that the required findings for the requested entitlements cannot be made and that the Planning Commission cannot grant them at this time.	This comment summarizes the detailed comments to follow related to the Project's consistency with required findings. Refer to subsequent responses to comments related to the Project's compliance with required findings. Refer to subsequent responses to comments: <ul style="list-style-type: none"> • Responses to Comments 16 through 20; • Responses to Comments 40 through 43; and • Responses to comments 58 through 69.
27	This comment asserts that the Planning Commission should reject the requested CE and land use entitlements, and direct the City to prepare an Initial Study and EIR or	This comment summarizes the appellants request for additional environmental analysis. See subsequent detailed comments and responses related to the applicability of a Categorical Exemption for this

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Comment Number	Comment Summary	Response
	MND.	project.
28	This comment provides project background.	Comment noted and no response required.
29	This comment provides a summary of the appellants standing and aggrieved status.	This comment has been noted and no response required.
30	This comment references the fair argument standard and court rulings.	Refer to response to Comment 8.
31	This comment references exceptions to the exemptions subject to Categorical Exemptions and court rulings.	Refer to subsequent responses to more detailed appellant comments referring to exceptions to exemptions: <ul style="list-style-type: none"> • Responses to Comments 55 through 57.
32	This comment asserts that the Project does not qualify for any class of categorical exemption and states that the Planning Commission must reject Applicant's request that the Project be found categorically exempt from CEQA.	Refer to responses to comments referred to in Exhibit A submitted prior to the Planning Commission hearing on November 15, 2018: <ul style="list-style-type: none"> • Responses to Comments 32 through 54.
33	This comment states that Class 1 categorical exemptions are meant to apply to projects involving no change in use. The commenter states that the subject property is completely out of use at this time and the proposed use does not qualify for a Class 1 categorical exemption.	The Class 1 exemption would apply for the proposed Project because the building would returned to the original use of the building. The number of rooms in the proposed hotel would be less than the previously approved 230-unit congregate care facility. Restaurant and venue space previously existed within the building and would be reconfigured within the building envelope.
34	This comment asserts that if the Project involved negligible or no expansion of use, it would not	The addition of a stairwell and elevator is required by Building and Fire Codes to accommodate the reuse of the building. The stairwell addition is minor when

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Comment Number	Comment Summary	Response
	qualify for a Class 1 categorical exemption because the alterations to the structure are not "minor" and the widening of the driveway would increase hardscape.	evaluated in light of the size of the existing building. The improvements to Victory Park driveway area are minor in consideration of the existing conditions in the park.
35	This comment summarizes that the commenter asserts that the Project does not qualify for a Class 1 categorical exemption.	The proposed project is the reuse of an existing building and returning the use to a hotel (original use). The previous use contained more residential units than the proposed number of rooms for the hotel.
36	This comment states that the Project does not involve the construction of new, small facilities or structures and is not a conversion of existing small structures from one use to another.	The Class 3 exemption would directly apply to the construction of small structures on the rooftop areas, which include a rooftop terrace and restroom and rooftop pool areas.
37	This comment states that the Project also does not qualify for a Class 3 categorical exemption because it would involve significant modifications to the exterior of the structure, driveway expansion, and the addition of a swimming pool deck and terrace.	The Class 3 exemption applies to new structures on rooftop areas.
38	This comment summarizes that the commenter asserts that the Project does not qualify for a Class 3 categorical exemption.	The Class 3 exemption would directly apply to the construction of small structures on the rooftop areas, which include a rooftop terrace and restroom and rooftop pool areas.
39	This comment states that the Project does not qualify for the Class 31 categorical exemption because the Project involves a radical change and intensification	The SOI Standards for Rehabilitation address the historical use of buildings proposed for rehabilitation or renovation. The project would return the building to its original use as a hotel. The proposed renovation includes restoration of building materials and

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Comment Number	Comment Summary	Response
	in use, from an out-of-use congregate care facility to a brand-new hotel. The comment further states the Planning Commission cannot find that it is "limited" to the restoration of the structure as an historical resource.	modifications that were made to accommodate the previous congregate care facility. The stairwell addition is required by Building and Fire Codes. The return to the original building use, restoration of the building, and building modifications were determined to be consistent with the SOI Standards. The rehabilitation and restoration of the building for the proposed Project would enhance the use of a vacant historic landmark building.
40	This comment states that Class 32 categorical exemptions are limited to in-fill development projects that are "consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations" and "would not result in any significant effects relating to traffic, noise, air quality or water quality." The commenter further asserts that the Project does not qualify for a Class 32 categorical exemption because it is (1) inconsistent with the applicable general plan and (2) because it cannot be readily perceived that the Project will not result in any significant effects relating to traffic, noise, air quality or water quality.	<p>This comment summarizes the detailed comments to follow related to the Project's consistency with Class 32 Categorical Exemption. Supplemental analysis was incorporated into Attachment J of the City Council letter to confirm use of this exemption. Refer to subsequent responses to comments related to the Project's compliance with the Class 32 Exemption. Refer to subsequent responses to comments:</p> <ul style="list-style-type: none"> • Responses to Comments 41 through 54.
41	This comment states that the Project is inconsistent with applicable land use plans and zoning. The commenter references a standard included in the PD-6 that requires the City to develop	Attachment J includes a technical report that addresses Low Cost Visitor Accommodations in the City of Long Beach Coastal Zone areas. The requirement for mitigation related to low cost accommodations is called out for Subarea 1a of PD-6.

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Comment Number	Comment Summary	Response
	and program/policy that protects and encourages lower cost visitor accommodations. The comment further states that the Project conflicts with this standard because the hotel would include luxury amenities strongly suggesting that it will provide expensive rather than affordable overnight visitor accommodations.	
42	The comment states that the Project does not provide enough public benefits. The comment states that the hotel and restaurant/venue uses would be contained within a private development. The commenter further suggests A project of this magnitude would better serve the community as housing and with ancillary uses that genuinely serve the public, such as, for example, meeting spaces that could be reserved out free of charge or public art gallery space.	PD-6 permits the reuse of the Breakers Building for a hotel use. The provision of hotel rooms would provide more of a public benefit than residential use because it provides accommodations to permit visitors to access the coast. The proposed hotel use would be more consistent with the provisions of the Coastal Act than a residential use. PD-6 does not include a provision requiring public benefits such as meeting spaces that could be reserved free of charge or public art gallery space. The proposed modifications to Victory Park include new amenities to enable public benefits because the new park amenities (seating areas, signage, lighting, trash receptacles) would add more passive park use as compared to existing conditions.
43	The comment summarizes that the Project does not qualify for a Class 32 categorical exemption because it conflicts with applicable general plan policies in that it does not propose affordable accommodations nor is it proposed to provide enough public benefits.	Attachment J includes a technical report that addresses Low Cost Visitor Accommodations in the City of Long Beach Coastal Zone areas. The requirement for mitigation related to low cost accommodations is called out for Subarea 1a of PD-6.
44	The comment states that the project may have significant traffic impacts because the Traffic Impact	The traffic study was prepared consistent with the City of Long Beach traffic impact analysis guidelines. An expanded cumulative projects list was analyzed in

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Comment Number	Comment Summary	Response
	Study fails to provide an accurate and conservative traffic analysis. The commenter requests a revised traffic study must be prepared.	a supplemental traffic analysis included in Attachment J. No significant traffic impacts would occur under the original or expanded cumulative projects analysis.
45	This comment states that the traffic study was narrow and only ten intersections.	The traffic study was prepared consistent with the City of Long Beach traffic impact analysis guidelines, including the number of intersections evaluated.
46	This comment asserts that nearby intersections nearby the Project Site are already operating at or near a LOS of E or F and/or anticipated to be operating at such levels. The commenter references previous traffic counts conducted between 2008-2016. The comment requests these intersections must be analyzed in a revised traffic study.	The traffic study was prepared consistent with the City of Long Beach traffic impact analysis guidelines. Level of Service (LOS) conditions change over time and the analysis included in the study is consistent with the guidelines for evaluating potential traffic impacts.
47	This comment asserts that the traffic study conducted only a single a.m./p.m. traffic count on June 7, 2018 and the traffic volumes recorded seem to be significant lower than traffic counts previously conducted by other projects.	The traffic study was prepared consistent with the City of Long Beach traffic impact analysis guidelines. Intersection traffic count data was obtained consistent with the City's guidelines.
48	This comment asserts that the traffic study appears to have recorded significantly lower baseline traffic counts in at least these five intersections. The comment states that the that the traffic count conducted for Project study is a potential outlier, which warrants utilizing the highest value	The traffic study was prepared consistent with the City of Long Beach traffic impact analysis guidelines. See above.

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Comment Number	Comment Summary	Response
	of known traffic counts conducted in the area and additional traffic counts should be performed.	
49	This comment states that the traffic study fails to identify numerous related projects that should have been incorporated into the analysis.	The list of projects provided by the applicant was reviewed. Some of the cited projects are constructed and operational, and therefore would be included in the baseline conditions reflected in existing traffic counts. Other pending projects were added to a supplemental traffic analysis included in Attachment J and no significant traffic impact would occur.
50	This comment states that the traffic study applied various trip credits in its estimate of the Project's trip generation that appear to be much higher than the trip credits applied to similar hotel/mixed-use projects near the LA Convention Center located in the City of Los Angeles. The commenter requests that the traffic study should be revised using more conservative and appropriate trip credits.	The site context is different from the example provided for the projects near the LA Convention Center. The traffic study was prepared consistent with the City of Long Beach traffic impact analysis guidelines.
51	This comment states that the traffic study analyzes only the estimated traffic impacts of the operational phase of the Project and ignores potential traffic impacts during the construction phase. The commenter requests that the traffic study be revised to analyze construction impacts. The comment summarizes that the Project does not qualify for a Class 32 categorical exemption because it may result in traffic impacts and	The project is the adaptive reuse of an existing building. Construction trips would be temporary in duration. Adaptive reuse involves very limited grading and fewer construction trips than new construction.

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Comment Number	Comment Summary	Response
	requests a revised analysis.	
52	The comment states that the Project does not qualify for a Class 32 categorical exemption because it may have significant noise impacts. The commenter asserts that no noise analysis was prepared for the project and states that the Project will introduce substantial new noise sources.	The project would be the reuse of an existing building. The primary hotel and accessory uses would be contained within a building consistent with the downtown urban setting. All open rooftop areas would be required to comply with the Municipal Code related to noise.
53	The comment states that the Project does not qualify for a Class 32 categorical exemption because it may have significant air quality impacts. The commenter asserts that the constriction trips and intensification of use may result in air quality impacts.	A CalEEMod output worksheet was added to Attachment J to verify that the construction and operation of the use would not exceed daily thresholds established for the South Coast Air Quality Management District.
54	The comment states that the Project does not qualify for a Class 32 categorical exemption because it may have significant water quality impacts due to proximity to off-site locations.	The project is the reuse of an existing building. All referenced locations are off-site. All improvements in Victory Park are required to meet LID requirements.
55	The comment states that multiple exceptions to exemptions apply to this Project because of significant cumulative impacts and potentially adverse impacts on historical resources.	Refer to subsequent detailed comments about exceptions to the exemptions. There would be no cumulative traffic or air quality impacts and all modifications to the building would be consistent with the SOI Standards for Rehabilitation.
56	This comment cites the exception to the exemption applies due to cumulative impacts caused by other projects in the area. A list of	The list of projects provided by the applicant was reviewed. The cited projects are pending projects were added to a supplemental traffic analysis included in Attachment J and no significant

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Comment Number	Comment Summary	Response
	projects are included in this comment.	cumulative traffic impact would occur.
57	This comment states that the project would be excepted from an exemption due to significant cumulative impacts and potential adverse impacts on the significance of a historical resource. The comment states that the proposed modifications to the existing building could threaten the building's eligibility for designation as a local landmark or for inclusion in the California Register of Historical Resources.	<p>The SOI Standards for Rehabilitation address the historical use of buildings proposed for rehabilitation or renovation. The project would return the building to its original use as a hotel. The proposed renovation includes restoration of building materials and modifications that were made to accommodate the previous congregate care facility. The stairwell addition is required by Building and Fire Codes. The return to the original building use, restoration of the building, and building modifications were determined to be consistent with the SOI Standards. The rehabilitation and restoration of the building for the proposed Project would enhance the use of a vacant historic landmark building.</p> <p>There would be no substantial change to a historic resource that would disqualify the use of a Class 31 Categorical Exemption.</p>
58	This comment states that the required findings for the requested entitlements cannot be made. The commenter asserts that the Project may negatively impact the abutting Victory Park, requiring further consideration of the interaction between the two sites. The comment further states that the vehicular driveway to the Breakers Hotel has potential for vehicular-pedestrian accidents and interrupt recreation in the park due to consistent vehicular entrances to the Project for all of its uses.	The driveway in Victory Park is an existing condition. The proposed modifications to Victory Park would reduce vehicle-pedestrian conflicts at Ocean Boulevard by relocating a vehicle driveway to Collins Way. The enhancements to Victory Park would improve the overall site design and passive park amenities. This Site Plan Review finding can be made in the affirmative.

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Comment Number	Comment Summary	Response
59	The comment states that the Site Plan review finding related to mature trees cannot be made. The commenter states that the relocation of the palm trees in the landscape plan could harm the trees, and that no evidence suggests that there is no possible alternative design.	The landscape plan is conceptual in nature. As conditioned, the non-native palm trees would be incorporated into the final landscape design. The finding addresses tree removal. This Site Plan Review finding can be made in the affirmative.
60	This comment states that the Project conflicts with elements of PD-6 related to lower cost visitor accommodations. The comment further states that the only option for parking off-site valet parking, which may deter middle or low-income guests, which separates the Project from goals to provide affordable visitor options.	Attachment J includes a technical report that addresses Low Cost Visitor Accommodations in the City of Long Beach Coastal Zone areas. The requirement for mitigation related to low cost accommodations is called out for Subarea 1a of PD-6. There is no on-site parking. The reuse of the Breakers Building, as outlined in PD-6, does not require the addition of parking. The provision of parking is to enable the viable use of the building. The provision of off-site also parking meets the CUP findings. PD-6 does not include a requirement for the provision of low-cost or free off-site parking.
61	This comment states that conditions of approval that would substantially alter the Project and that should be completed before granting the CUP. The commenter further states that requirements listed for the hotel operations plan and should be reviewed prior to approval of the CUP.	The conditions of approval must be satisfied prior to the issuance of building permits or business licenses. An operations plan is contingent on the final operation information of the venues. This is a typical condition of approval for use-related entitlements. The operations plan must demonstrate compliance with all code requirements.
62	The comment restates the required finding and that the census tract is oversaturated with on-sale alcohol licenses. The comment further states that the new extensions	There are existing on-premises alcohol licenses active for the Breakers Building. Because the proposed CUP is not for a new license, the concentration of alcohol licenses in a census tract would not apply. The CUP is to document the floor plan for venue spaces that are

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Comment Number	Comment Summary	Response
	allow for an increase in number of on-site venues where alcoholic beverages may be consumed, potentially increasing the alcohol consumption overall.	already covered by the existing alcohol licenses.
63	The comment summarizes that the required findings for a CUP for on-sale alcohol cannot be made.	The existing licenses, which cover the entire building, will be transferred to the building ownership. The findings related to oversaturation of licenses would not apply to this CUP application.
64	The comment asserts that neither LCDP finding can be made because the proposed Project is inconsistent with the Local Coastal Program (LCP) and does not conform to the public access and recreation policies of Chapter 3 of the Coastal Act.	As noted in the LCDP findings, the proposed use enhances access to the coast by providing hotel accommodations in the Coastal Zone. The incorporation of a TDM Plan for employees and patrons furthers the hotel's consistency with Chapter 3 of the Coastal Act's provision for non-vehicular access. In addition, the improvements in Victory Park enhance pedestrian access and facilities in the park.
65	The comment states that the Project is inconsistent with the LCP because the Project does not strengthen the entry to Promenade South on Ocean Boulevard at the southeast corner of Pine Avenue as required by the provisions of Area 14, Breakers, of the Downtown Shoreline Policy Plan. The commenter asserts that providing visitor-serving uses' cannot substitute for a requirement to strengthen an entry to the Promenade South. The commenter suggests that this goal could be accomplished by widening the pathway to or explicitly directing pedestrians towards the	The proposed use is the reuse of an existing building on a separate parcel from the Promenade entrance. The suggested widening of a pathway to the Promenade is already achieved by retaining the existing walkway along the driveway entrance. The building is on a separate city block from the subject Promenade entrance and there are no additional on-site enhancements that would apply to this PD-6 standard.

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
	Promenade.	
66	The comment states that the Project does not comply with PD-6, Subarea 7, which requires a project that includes a change of use of an existing building to "provide for the eastward continuation of the east/west pedestrian walkway across the subject sites."	The east/west pedestrian walkway is not located on the Breakers site. There are no additional on-site enhancements that would apply to this PD-6 standard.
67	The comment states that the second required finding cannot be made because the Project does not encourage lower cost recreational and visitor facilities. The comment cites the Coastal Act's goal related to public access to and along the coast. The commenter asserts that in order to fully comply with the Coastal Act, the Project should maximize public uses within the building and ensure that they are accessible to lower-income patrons.	<p>Attachment J includes a technical report that addresses Low Cost Visitor Accommodations in the City of Long Beach Coastal Zone areas. The requirement for mitigation related to low cost accommodations is called out for Subarea 1a of PD-6.</p> <p>PD-6 does not include a provision requiring public benefits such as meeting spaces that could be reserved free of charge or public art gallery space. The proposed modifications to Victory Park include new amenities to enable public benefits because the new park amenities (seating areas, signage, lighting, trash receptacles) would add more passive park use as compared to existing conditions.</p> <p>As noted in the LCDP findings, the proposed use enhances access to the coast by providing hotel accommodations in the Coastal Zone. The incorporation of a TDM Plan for employees and patrons furthers the hotel's consistency with Chapter 3 of the Coastal Act's provision for non-vehicular access. In addition, the improvements in Victory Park enhance pedestrian access and facilities in the park.</p>
68	The comment expresses concern that the conditions of the area outlined in the LCP are nearly four decades old. The commenter states	The PD-6 standards are included in the certified LCP. The LCP has been certified by the California Coastal Commission and are the applicable development standards established for the subject site.

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
	that the City should not consider further changes within the Coastal Zone until the LCP is updated and fully certified by the California Coastal Commission.	
69	The comment states that the required findings of fact for the LCDP cannot be made due to inconsistencies with applicable land use plans and Chapter 3 of the Coastal Act.	As noted above, the provision of hotel accommodations improves access to the coast as compared to other permitted uses for this site (residential). The enhancements to Victory Park and the TDM Plan would be consistent with Chapter 3 of the Coastal Act as it pertains to vehicular and pedestrian access to the coast.
70	The commenter summarizes concerns related to potential environmental impacts related to CEQA and compliance with the Municipal Code. The Commenter requests that the Planning Commission deny the CE and land use entitlements and that the City prepare an Initial Study and an EIR, or, at the very least, an MND.	This summary comment is noted. Based on the responses to comments above, the Project would qualify for a Categorical Exemption and all findings can be made for the requested entitlements.
71	<p>This comment states that the appellants reserve the right to supplement these comments and hearings and proceedings for this Project.</p> <p>This comment further requests that the Appellants are included on the notice list for all notices of CEQA actions, Appeal hearings, and any approvals, Project CEQA determinations, or public hearings to be held on the Project.</p>	Comment noted. The appellant has been included on all public noticing.

Table 2: David P. Denevan (APL18-005)

Comment Number	Comment Summary	Response
1	This comment is a letter from the California Coastal Commission to the City of Long Beach Department of Planning and Building dated April 4, 2003. The letter addresses previous development within the Victory Park area at the Camden Development.	This comment has been noted.
2	This comment is an introduction to the commenter's appeal of the Planning Commission's approval of Victory Park improvements in front of the Breakers Hotel. The commenter further states no objection to the conversion of the Breakers to a hotel.	This comment is introductory in nature and the subject of this appeal of the Victory Park design is noted.
3	The commenter requests keeping the lawn and installing moisture sensors to conserve water. The commenter states that lush, green public spaces are needed.	The proposed landscape plan is conceptual in nature and, as conditioned, the final design will be subject to approval by the Director of Development Services. The conceptual landscape design is to show the decision makers the proposed overall layout of the modifications of the driveways and changes to walkways. The proposed landscaping would be lush landscape areas that also meet Model Water Efficient Landscape Ordinance (MWELO) standards. The conceptual landscape palette would provide lush green spaces that will enhance Victory Park, while also softening the context of the built environment.
4	This comment provides background information about the history of Victory Park.	This background information on Victory Park has been noted.
5	The comment requests the following with reference to the Victory Park Design Guidelines:	The existing driveway would provide a more continuous frontage of park space

Table 2: David P. Denevan (APL18-005)

Comment Number	Comment Summary	Response
	<ol style="list-style-type: none"> 1. No loss of park space. 2. Preservation of lawn area as grass. 3. Concrete park identification signage. 4. Wood and steel benches, no concrete benches. 5. Drinking fountain and trash receptacles. 6. Limit sidewalk to 8 feet in width with no staggered sections of concrete walk. 	<p>along Ocean Boulevard. Under existing conditions, the driveway separates the lawn area from planting areas along Collins Way. The relocated driveway would enhance the frontage of Victory Park and reduce pedestrian-vehicle conflict at Ocean Boulevard. The driveway widening would increase hardscape, but would provide for an overall enhancement to the park.</p> <p>As previously noted, the landscape design is conceptual in nature. Final design of park signage, benches, drinking fountain, and trash receptacles will be approved pursuant to the design guidelines.</p> <p>The design guidelines permit the use of concrete sculptural benches in certain conditions. The final design of the benches will be required to be consistent with provisions included in the guidelines.</p> <p>There is a continuous existing brick walkway along the circular driveway that provide two pedestrian paths through the park. The existing path along the driveway entrance area would maintain the path with new paving materials and a paved area near proposed clustered seating. The path that formally was at the driveway exit would be moved towards the middle of the park and maintain an 8 foot width through the park to access additional seating areas. The path widens near the paved area in front of the Breakers</p>

Table 2: David P. Denevan (APL18-005)

Comment Number	Comment Summary	Response
		Building, which aligns with the existing brick path that wraps around the driveway.
6	This comment includes the same content as the previous letter, but is addressed to the Mayor and City Council.	Refer to responses to comments 2 through 5.
7	This comment states that the landscape plan for Victory Park in front of the Breakers does not comply with the Victory Park Design Guidelines. The comment further states that there is not enough grass and too much paving that would reduce park space.	Due to efforts to reduce water consumption, the conceptual landscape plan has included a planting palette to comply with the MWEL. The existing driveway does not provide a functional design for accessing the site and interrupts landscape areas in Victory Park. The reconfiguration of the driveway would reduce pedestrian-vehicle conflict at Ocean Boulevard and provide a more continuous span of park space uninterrupted by vehicles. Replacement park space will be provided off-site to accommodate the widened driveway area.
8	This comment asserts that the guidelines are not suggestions and carry out the LCP for the park.	The Victory Park Design Guidelines are guidelines to which the conceptual landscape design has been determined to meet the intent of the guidelines.
9	This comment provides background information about the history of Victory Park.	This background information on Victory Park has been noted.
10	This comment notes that benches and light fixtures were removed from Victory Park in front of the Breakers decades ago.	The conceptual landscape plan proposes to reintroduce benches and light fixtures into the portion of Victory Park in front of the Breakers Hotel.
11	This comment provides background on the efforts to provide park signage, benches, drinking fountains, trash containers and trees in	This background information on Victory Park has been noted.

Table 2: David P. Denevan (APL18-005)

Comment Number	Comment Summary	Response
	Victory Park.	
12	This comment consists of the Victory Park Design Guidelines and newspaper publications about Victory Park.	This background information on Victory Park has been noted.

VICTORY PARK Est. 1889 - City of Long Beach

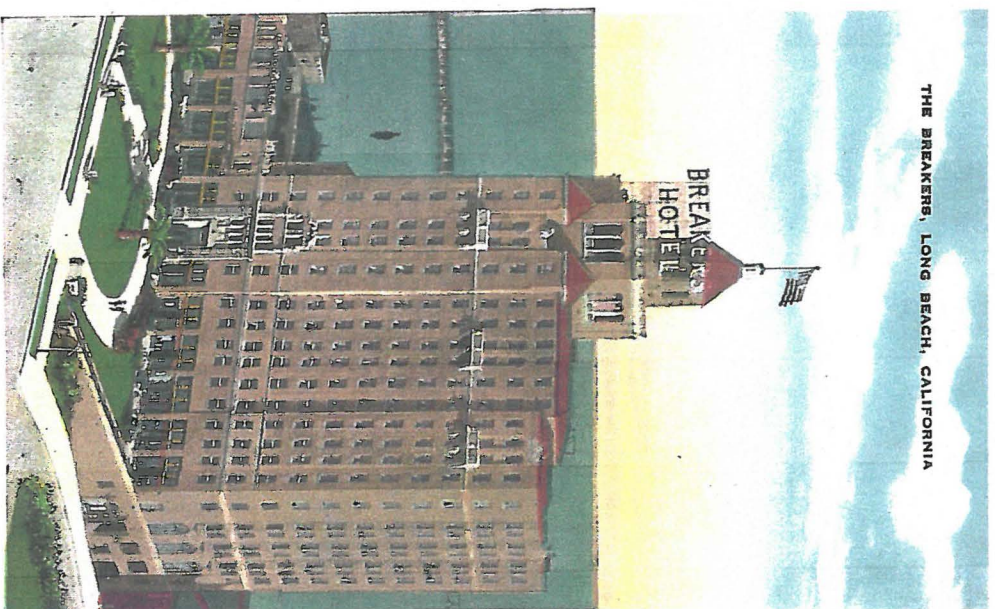
6860

POST
CARD



The magnificent BREAKERS HOTEL, towering 265 feet into the sky, overlooks the Pacific Ocean at Long Beach, California. Here indeed the tonic sea air of Southern California's ideal climate can be enjoyed to the full. Facing the great Horse Shoe Pier and Auditorium at Long Beach, the BREAKERS HOTEL commands an unparalleled panorama of sea, island and mountains, curving coast line, with the progressive city of Long Beach in foreground.

MADE IN U.S.A. BY E. C. KROPP CO., MILWAUKEE



This small, beleaguered section of Victory Park at 210 E. Ocean Blvd., in Downtown has already been reduced in size by the widening of Ocean Blvd. (Over 20 years ago, park benches were removed.)

Council District 2



**DRAFT 3, 1-14-2019,
of a proposed letter to the City Council - and if necessary,
the California Coastal Commission. Suggestions welcome...**

SOME CLARIFICATIONS

Dear

Re: Proposed Breakers' Hotel - Victory Park compromise

Pursuant to Local Coastal Development Permit 18-022 and the Victory Park Design Guidelines, I want the Long Beach City Council to overturn the Nov. 15, 2018 Planning Commission's decision to reduce Victory Park in size, and instead approve a compromise between the Breakers' developer and park advocates.

ONE: THIS COMPROMISE WOULD RESULT IN A SIGNIFICANT NET GAIN OF RECOGNIZABLE AND PUBLIC ACCESSIBLE PARKLAND IN THE HEART OF DOWNTOWN - WHERE PUBLIC GREEN SPACE IS SORELY NEEDED!

TWO: IT WOULD TAKE THE DEVELOPER OFF THE HOOK FOR BUYING PROPERTY IN THE LOCAL COASTAL ZONE TO REPLACE, ON A 1:1 RATIO, LOST PARKLAND IN FRONT OF THE BREAKERS.

HOWEVER, PER THE LCP, WE EXPECT THE DEVELOPER TO REPLACE LOST PARKLAND ON A 1: 1 RATIO, NORTH OF OCEAN BLVD. - SUCH AS ON THE WESTSIDE OR IN NORTH LONG BEACH!

YEARS AGO, this small, beleaguered section of Victory Park at 210 E. Ocean Blvd., in Downtown was reduced in size by

the widening of Ocean Blvd. Over 20 years ago, park benches were removed.

John Molina and his development team want to expand an existing driveway through OUR PARK as part of the conversion of the adjacent Breakers' building to a 4-star hotel. In a Nov. 20 email, Development Services' Christopher Koontz indicated that "1398" square feet would be removed from the park, "related to required safety realignment of the driveway."

But, the Certified LCP (Local Coastal Plan) states: "Require that any conversion of parkland be replaced amenity - for - amenity and acre - for -acre at a 2:1 ratio. One acre of replacement land shall be located in a park service area where the land was converted and an additional acre of replacement land shall be located in a park service area needing parkland as determined by the Recreation Commission."

For starters: Pursuant to the Victory Park Design Guidelines, I want the following: Real lawn, not plastic grass, or ground cover; on the lawn place comfortable wood and steel benches (not concrete) BENCHES TO FACE NORTH; and locate a drinking fountain next to the Ocean Blvd.sidewalk. Also place a park identification sign next to that sidewalk, that can be easily read by people passing by; monument style, 5 feet long and 2 feet high; that states:

VICTORY PARK
Est. 1889 - City of Long Beach

The larger context: Most of it dating from 1889, Victory Park, along with the connected Santa Cruz Park to the west, is a linear park located on the south side of Ocean Blvd. between Shoreline Dr. on the east and Golden Shore on the

west (about one mile long). These parks were created for “ornamentation and recreation”. The parks “reinforce the character of Ocean Boulevard as a grand boulevard.” The name Victory Park honors WWI veterans.

Unfortunately, the two parks have been reduced in size by Ocean Blvd. widening, and in some places, excessive paving that benefits adjacent property owners-not the general public. Without benches and park identification signage, some swaths of park lawn have been turned into de facto front yards for bordering property owners; such as the Union Bank building at Ocean and Golden Shore. Part of the bank actually sits on a former section of Santa Cruz Park.

More recently, park benches were removed from Santa Cruz park in front of Molina Center, located next to Union Bank. This is in violation of the original development agreement with the City! A 12 - foot long Santa Cruz Park sign is still there. put there in 1983, after a guard from the then called Arco Towers ejected me from the park - saying “This is not a park. I have orders to run people out.”

Public pressure: Starting in 1977, when 3 majestic trees in Santa Cruz Park were threatened by redevelopment, citizens successfully pushed City officials to preserve, enlarge and enhance Santa Cruz and Victory parks. The trees were saved. In 1980, the two parks were dedicated in perpetuity. In 1989, the Victory Park Design Guidelines were certified. The guidelines support the mandate of the LCP to preserve and enlarge these parks, and add amenities. Now, citizens, if they testify at public hearings, have the legal clout to demand that developers include park signage and amenities - and keep the two parks from being over-paved for non - park purposes!

Proposed compromise: With City Council approval and City enforcement, the Breakers' developer would get the realigned driveway - that would displace precious parkland. In exchange the developer, or City, or both, per specifications in the design guidelines, would IN ADDITION TO WHAT I ASKED FOR EARLIER IN THIS LETTER, pay for and install the following,

- 1. Place park benches on the lawn in front of Molina Center. Add a drinking fountain next to the Ocean Blvd. sidewalk. Keep in natural turf.**
- 2. IN THE SMALL SECTION OF PARK in front of the Ocean Center Building, place ONE wood and steel park bench. Keep lawn in natural turf. Save in place "CITY PROPERTY" plaque. PER THE OPTION IN THE GUIDELINES, ADD A PARK IDENTIFICATION PLAQUE.**
- 3. Reclaim as a public park Union Bank's de facto front yard - with park identification signage, wood and steel benches, trash receptacle and a drinking fountain next to the city sidewalk, Keep all the existing lawn in natural turf.**
- 4. Reclaim all other de facto front yards elsewhere in the two parks - with park signage, benches, trash receptacles and drinking fountains.**
- 5. Remove the "180 East Ocean Boulevard" private address signage from Victory Park, and replace with a plaque telling the history of Victory Park and its connection to the WWI veterans; size 18 inches by 18 inches.**
- 6. Replace missing plaque that marked the boundary (and terminus) of the historic ranchos Los Cerritos and Los Alamitos. The plaque had been affixed to a boulder in Victory Park near Shoreline Drive**

There is a population boom in the heart of downtown! We need more parkland there, not less!

Sincerely,

David P. Denevan
4322 Charlemagne Ave.
Long Beach, CA 90808-1409
(562)425-9910

Note: Use Marathon grass. “Drought resistant grass sod that’s naturally dark green...Excellent wear resistance. Ideal for Southern Calif. Tolerant to high heat. Uses less water.” Source: Google. To conserve water, install moisture sensors.

Note: To keep people from sleeping on benches, use a steel divider on each bench.



CITY OF LONG BEACH

DEPARTMENT OF DEVELOPMENT SERVICES

333 West Ocean Blvd., 5th Floor

Long Beach, CA 90802

(562) 570-6194

FAX (562) 570-6068

PLANNING BUREAU

APPLICATION FOR APPEAL

An appeal is hereby made to Your Honorable Body from the decision of the

- ☐ Site Plan Review Committee
- ☐ Zoning Administrator
- ☒ Planning Commission
- ☐ Cultural Heritage Commission

Which was taken on the Nov day of 15, 2018.

Project Address: 210 E. Ocean Blvd.

I/We, your appellant(s), hereby respectfully request that Your Honorable Body **reject** the decision and ☐ **Approve** / ☒ **Deny** the application or permit in question.

ALL INFORMATION BELOW IS REQUIRED

Reasons for Appeal: Landscape plan does not meet the criteria and rules of the Victory Park Design Guidelines

Appellant Name(s): David P. Denevan

Organization (if representing) No

Address: 4322 Charlemagne Ave

City Long Beach State CA ZIP 90808 Phone: (562) 425-9910

Signature(s) David P. Denevan Date _____

- A separate appeal form is required for each appellant party, except for appellants from the same address, or an appellant representing an organization.
- Appeals must be filed within 10 days after the decision is made (LBMC 21.21.502).
- You must have established *aggrieved* status by presenting oral or written testimony at the hearing where the decision was rendered; otherwise, you may not appeal the decision.
- See reverse of this form for the statutory provisions on the appeal process.

BELOW THIS LINE FOR STAFF USE ONLY

☐ Appeal by Applicant ☒ Appeal by Third Party

Received by: RTC

Case. No.: 18-015

Appeal Filing Date: 11/21/18

Fee: 100

☒ Fee Paid

Project (receipt) No.: PLNS 43763

LICENSED CONTRACTORS DECLARATION				WORKER'S COMPENSATION DECLARATION					
<p>I hereby affirm that I am licensed under provisions of Chapter 9 (Commencing with Section 7000) of Division 3 of the Business and Professional Code, and my license is</p> <p>License _____ License _____</p> <p>Dat _____ Contract _____</p> <p style="text-align: center;">OWNER-BUILDER DECLARATION</p> <p>I hereby affirm that I am exempt from the Contractors License Law for the following reason (Sec.7031 California Business and Professional Code: Any City which requires a permit to construct, alter, improve, demolish or repair any structure prior to its issuance also requires the applicant for such permit to file a signed statement that he is a licensed contractor pursuant to the provisions of the Contractors License Law (Ch.9) (Commencing with Sec.7000 of Div.3 of the B. & P. C.) or that he is exempt therefrom and the basis for the alleged exemption. Any violation of Sec.7031.5 by any applicant for a permit subjects the applicant to a civil penalty of not more than five hundred dollars (\$500.00):</p> <ul style="list-style-type: none"> • I as owner of the property, or my employees with wages as their sole compensation, will do the work and the structure is not intended or offered for sale (Sec.7044, B. & P. C. : The Contractors License Law does not apply to an owner of property who builds or improves thereon, and who does such work himself or through his own employees, provided that such improvements are not intended or offered for sale. If, however, the building or improvements is sold within one year of completion, the owner-builder will have burden of proving that he did not build or improve for the • I am exempt under _____, B. & P. C. for this _____ <p>Dat _____ Owne _____</p> <p style="text-align: center;">- IMPORTANT -</p> <p>Application is hereby made to the Superintendent of Building and Safety for a permit subject to the conditions and restrictions set forth on the front faces of this application</p> <p>1. Each person upon whose behalf this application is made and each person at whose benefit work is performed under or pursuant to any permit issued as a result of this application agrees to and shall indemnify and hold harmless the City of Long Beach its officers, agents, and employees from any liability arising out of the issuance of any permit from this application.</p> <p>2. Any permit issued as a result of this application becomes null and void if work is</p>				<p><input type="checkbox"/> I have and will maintain workers' compensation insurance, as required by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued. My workers' compensation insurance carrier and policy number are:</p> <p>Carrier _____ Policy _____</p> <p style="text-align: center;">(This Section need not be completed if the permit is for one hundred dollars (\$100) or less)</p> <p><input type="checkbox"/> I certify that in the performance of the work for which this permit is issued, I shall not employ any person in any manner so as to become subject to the workers' compensation laws of California, and agree that if I should become subject to the workers' compensation provisions of Section 3700 of the Labor Code, I shall</p> <p>Dat _____ Applica _____</p> <p>WARNING: FAILURE TO SECURE WORKERS' COMPENSATION COVERAGE IS UNLAWFUL, AND SHALL SUBJECT AN EMPLOYER TO CRIMINAL PENALTIES AND CIVIL FINES UP TO ONE HUNDRED THOUSAND DOLLARS, IN ADDITION TO THE COST OF COMPENSATION DAMAGES AS PROVIDED FOR IN SECTION</p> <p>I hereby state that there is a construction lending agency for the performance of the work for which this permit is issued (Sec.3907, Civ. C.).</p> <p>Lender's _____</p> <p>.. _____</p> <p>Lender's _____</p> <p>... _____</p> <p>I certify that I have read this application and state that the above information is correct. I agree to comply with all City and State laws relating to the building construction, and hereby authorize representatives of this city to enter upon the</p> <p>_____ Signature of Owner or Contractor</p> <p>_____ Date</p>					
<p>JOB ADDRESS</p> <p>210 OCEAN BLVD</p>				<p>RECEIPT NO.</p> <p>03406643</p>		<p>DATE</p> <p>11/21/18</p>		<p>PROJECT NO.</p> <p>PLNE43763</p>	
<p>JOB DESCRIPTION</p> <p>Appeal by David P. Denevan</p>							<p>AREA</p> <p>0</p>		
<p>OWNER</p> <p>LONG BEACH PROPERTY LLC</p>				<p>OCCUPANCY</p>		<p>PLANNING</p> <p>MIXED USES</p>			
<p>ADDRESS</p> <p>22900 VENTURA BLVD 200</p>				<p>ASSESSOR NO.</p>		<p>ZONE</p> <p>PD-6</p>			
<p>CITY</p> <p>WOODLAND HILLS CA</p>		<p>STATE</p>		<p>ZIP CODE</p> <p>91364-1279</p>		<p>FSB</p>		<p>S</p>	
						<p>RSB</p>		<p>CENSUS TRACT</p> <p>576100</p>	
<p>APPLICANT</p> <p>LONG BEACH PROPERTY LLC</p>									
<p>CONTRACTOR</p>									
<p>ADDRESS</p>									
<p>CITY</p>				<p>STATE</p>		<p>ZIP CODE</p>		<p>PHONE NO.</p>	
<p>STATE LICENSE NO.</p>					<p>CITY LICENSE NO.</p>				
<p>ARCHITECT/ENGINEER</p>					<p>LICENSE NO.</p>				
<p>ADDRESS</p>									
<p>CITY</p>				<p>STATE</p>		<p>ZIP CODE</p>		<p>PHONE NO.</p>	
<p>VALUATION</p> <p>0.00</p>		<p>PRESENT BLDG USE</p>		<p>PROPOSED BLDG USE</p>		<p>BLDG HEIGHT</p> <p>0</p>		<p>TYPE OF CONSTRUCTION</p>	
<p>LEGAL DESCRIPTION</p>									

Paid by: DAVID P DENEVAN
\$100.00 Cash (CA)

8027360

100.00

COA Appeal Fee

N

100.00

CHECK

CALIFORNIA COASTAL COMMISSION

South Coast Area Office
200 Oceangate, Suite 1000
Long Beach, CA 90802-4302
(562) 590-5071



✓
April 4, 2003

Greg Carpenter, Zoning Administrator
City of Long Beach Department of Planning and Building
333 West Ocean Boulevard
Long Beach, CA 90802

Subject: Victory Park Strip, 330 W. Ocean Blvd. (between Pacific Ave. & Chestnut Place).

Dear Mr. Carpenter:

In a letter dated February 5, 2003, we requested a copy of the City's action approving non-park related development within the 80-foot wide Victory Park strip located on the south side of Ocean Boulevard between Pacific Avenue and Chestnut Place. The non-park related development consists of concrete pads, retaining walls, fences and electric transformers housed in green cabinets. You responded to our request in a letter dated February 12, 2003. Thank you for your prompt response.

In your letter dated February 12, 2003, you assert that the City approved the non-park related development within the 80-foot wide Victory Park strip as part of condition compliance procedure that had been delegated to the City Recreation Commission by Special Condition No. 46 of Local Coastal Development Permit No.0002-25. The Planning Commission approved Local Coastal Development Permit No.0002-25 on November 16, 2000 for "The Park at Harbour View" (Camden Development Inc.). We continue to maintain that Local Coastal Development Permit No.0002-25 did not include authorization for any non-park related uses within the 80-foot wide Victory Park strip that fronts the development site.

Special Condition No. 46 of Local Coastal Development Permit No.0002-25 states:

Prior to issuance of a building permit or approval of a final map, the applicant shall obtain approval from the Recreation Commission for the Victory Park improvement plan. Any section of the Victory Park area, if it has not been properly dedicated for park purpose, the applicant shall offer such a dedication with the approval of a final map.

Further, the City's adopted findings for the approval of Local Coastal Development Permit No.0002-25 state:

"The proposed development conforms to the certified Local Coastal Plan...
...Furthermore, the entire strip of land designated as Victory Park located within the proposed subdivision will be properly dedicated for park purpose with the approval of a final map."

The proposed and City-approved plans for the proposed subdivision designated Victory Park as the entire 80-foot wide strip of land located southerly of the Ocean Boulevard curblin, consistent with the requirement of the certified Local Coastal Plan.

The certified City of Long Beach Local Coastal Plan, in regards to Victory Park, states:

All new development between Ocean Boulevard and Seaside Way, above the Ocean Boulevard curb level, shall be set back a minimum of eighty feet from the Ocean Boulevard curblane, as existing on July 1, 1989, or set back the width of the City park strip, whichever is greater." [PD-6 General Development and Use Standards, Section (c)].

The Commission, in good faith, relies on the local government's findings and conditions when it decides whether or not to appeal a local decision on a coastal development permit that affects coastal resources. In this case, the Commission determined that the above-stated special condition and finding of consistency would ensure that the entire Victory Park strip in the project area would be protected for public access and recreation in perpetuity as required by the certified Local Coastal Plan.

Your letter dated February 12, 2003 states that Special Condition No. 46 of Local Coastal Development Permit No.0002-25 enabled the City to permit non-park related uses (transformers) to displace portions of the 80-foot wide Victory Park strip that was previously approved and required as part of the development authorized by the Planning Commission on November 16, 2000. Special Condition No. 46 requires the applicant to, "...obtain approval from the Recreation Commission for the Victory Park improvement plan."

We disagree with your assertion that the Recreation Commission's approval of the Victory Park improvement plan could be used to alter the size or dimensions of the previously approved and required 80-foot wide Victory Park strip or to add non-park related uses.

The certified LCP (Page III-DS-34) states:

"No parkland which has been dedicated or designated within the coastal zone shall be committed to another use unless the City replaces such parkland on an acre-for-acre basis within or adjacent to the coastal zone **with the approval of the California Coastal Commission.**" [Emphasis added.]

The Special Condition No. 46 of Local Coastal Development Permit No.0002-25 authorizes the Recreation Commission to approve a Victory Park improvement plan. We assert that in carrying out Special Condition No. 46, the Recreation Commission's authority to approve the Victory Park improvement plan is limited to approving the design of the improvements for the previously delineated park strip, absent any further review by the Coastal Commission to consider possible revisions. The Recreation Commission's approval of the Victory Park improvement plan pursuant to Special Condition No. 46 can not be used to justify a change in the park boundaries, permitting of non-park uses, or any displacement of parkland, whether consistent with the certified LCP or not. The change to the dimensions of the Victory Park strip is not consistent with the plans approved by the City on November 16, 2000 and reviewed shortly thereafter by Commission staff. As such, the originally approved dimensions of the Victory Park strip remain part of the duly approved coastal development permit. Any change to the dimensions of the park or addition of non-park uses to the park strip can be approved only as part of an amendment to the previously approved local coastal development permit.

Greg Carpenter
April 4, 2003
Page 3

Such an amendment would be appealable to the Coastal Commission. The Coastal Commission would then review the proposed changes to the park, including any parkland replacement plan, for compliance with the policies of the certified LCP and the public access policies of the Coastal Act.

Since the City did not follow this process, we consider the non-park uses (e.g., concrete pads, retaining walls, fences and electric transformers housed in green cabinets) now located within the 80-foot wide Victory Park strip to be unpermitted development in Victory Park.

✓ We are also concerned that the City's proposed design for the Victory Park strip, between Pacific Avenue and Chestnut Place, may not conform to the Victory Park Design Guidelines, adopted by the Planning Commission on October 26, 1989. The Victory Park Design Guidelines include the following design requirements: the park strip shall be developed as an informal landscaped public park, and not be utilized to accent the entrance to the adjacent development; one pedestrian walkway, no wider than eight feet, is permitted to connect each development to the Ocean Boulevard sidewalk; one public bench shall be installed in the park for each sixty feet of frontage; and trash receptacles and drinking fountains shall be provided. Our office would welcome any additional opportunity to comment on the City's proposed park improvement plan.

In order to avoid problems like this in the future, we suggest that the final design plans for all parkland improvements be reviewed and approved as part of the local coastal development permit process, instead of being delegated for approval after the City takes its final action on the local coastal development permit. We will carefully review all future local coastal development permits that include development in or adjacent to Victory Park (or other parkland) to ensure that they include protection of all affected parkland and recreational resources. Commission staff will consider appealing any local approval that lacks such assurances or does not maintain and protect the Victory Park strip.

Thank you for your cooperation in this matter and we look forward to working with you and your staff in the future. Please call Charles Posner at (562) 590-5071 if you have any questions.

Sincerely


DEBORAH LEE
Deputy Director

Dayna Bochco, Chair
California Coastal Commission
45 Fremont St.
Suite 2000
San Francisco, CA 94105

Nov. 20, 2018

Dear Dayna Bochco,

Pursuant to the Victory Park Design Guidelines, I'm appealing the Nov. 15, 2018 Long Beach Planning Commission's approval to remove lawn and park space from the beleaguered Victory Park in front of the Breakers' building at 210 E. Ocean Blvd. (I have no problem with the conversion of the adjacent Breakers to a 4 star hotel.)

2

Keep the existing lawn which has been there since at least 1925. To conserve water, install moisture sensors. Don't turn this park area into a desertscape! In the burgeoning heart of Downtown, we need lush, green public spaces to soften all the blacktop, concrete, stucco, glass, glare and din.

3

Most of it dating from 1889, Victory Park, along with Santa Cruz Park to the west, is a ribbon of lush lawn between Alamitos and Golden Avenue, broken in places by streets and gross overuse of concrete pavement in a public park.. The two parks are dedicated "in perpetuity." They are protected by the LCP (Local Coastal Program) , that is supported by the Victory Park Design Guidelines. These documents are worthless if government officials don't enforce them!

4

In 1977, there was a public outcry after a long history of the adjacent property owners and developers degrading these public parks! That eventually resulted in inclusion of the parks in the LCP, and creation of the Guidelines, all with broadly-based public input and support!

As new buildings were proposed for the south side of Ocean Blvd., concerned citizens successfully fought for inclusion of park signage, benches, drinking fountains, etc. But the damage had been done! Part of the 14 storey Union Bank sits in what had been a section of

✓

the Olmsted Brothers design for Santa Cruz Park. (This firm had also designed the White House grounds.) Without park signage and benches, long swaths of precious park became de facto front yards for adjacent property owners on Ocean Blvd. One office building's raised concrete terrace replaced park lawn!

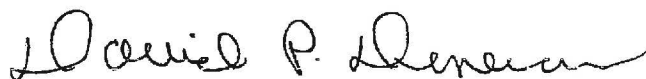
In 1983, an ARCO Tower's guard ejected me from Santa Cruz Park lawn, saying, "This is not a park. I have orders to run people out." With the help of the ARCO CEO, Parks and Rec. and the neighborhood group CHAG, \$5,000 was raised to reclaim OUR park. A concrete 12 - foot long "SANTA CRUZ PARK " sign was installed!

Pursuant to the Guidelines I want the following:

1. No loss of park space.
2. The lawn area preserved in grass.
3. Concrete park identification signage that's easy to read by people passing by on Ocean Blvd. A 2 x 5 foot sign should read:
SANTA CRUZ PARK
Established 1889
City of Long Beach
4. Inviting, comfortable wood and steel benches. NO CONCRETE BENCHES!
5. Drinking fountain and trash receptacles.
6. Limit the permitted new sidewalk across the park to 8 feet in width, with no staggered sections of concrete walk.

See specifications for all of the above in the Victory Park Design Guidelines.

Sincerely,



David P. Denevan
4322 Charlemagne Ave.
Long Beach, CA 90808
562- 425- 9910
Enclosures

Nov. 20, 2018

Attention: City Clerk
Long Beach City Council
333 W. Ocean Blvd.
Long Beach , CA 90802

Dear Mayor Garcia and Members of the Council,

Pursuant to the Victory Park Design Guidelines, I'm appealing the Nov. 15, 2018 Long Beach Planning Commission's approval to remove lawn and park space from the beleaguered Victory Park in front of the Breakers' building at 210 E. Ocean Blvd. (I have no problem with the conversion of the adjacent Breakers to a 4 star hotel.)

Keep the existing lawn which has been there since at least 1925. To conserve water, install moisture sensors. Don't turn this park area into a desertscape! In the burgeoning heart of Downtown, we need lush, green public spaces to soften all the blacktop, concrete, stucco, glass, glare and din.

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6



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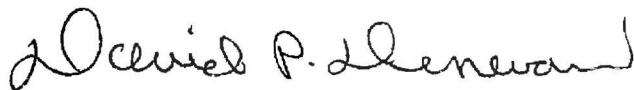
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Sincerely,



David P. Denevan
4322 Charlemagne Ave.
Long Beach, CA 90808
562- 425- 9910
Enclosures

Nov. 15, 2018

Dear Members of the Long Beach Planning Commission,

The landscape plan for Victory Park in front of The Breakers does not comply with the Victory Park Design Guidelines.

7

NOT ENOUGH GRASS! TOO MUCH PAVING!
REDUCTION OF PRECIOUS PARK SPACE!

Guidelines are not suggestions. They carry out the mandate of the California Coastal Commission's Local Coastal Plan (Program) for OUR park.

8

Twelve civic groups were successful in getting Victory and Santa Cruz Parks into the Local Coastal Plan that called for a consistent design for a grassy ribbon of lush green from Alamilos Ave. to Golden Ave. on Ocean Blvd.

9

This was after these parks had become venues for commercial signage; sections of park had been paved over, and some turned into sterile rarely used terraces. Large swaths of grass were turned into defacto front yards by adjacent property owners, without any indication that they were public parks

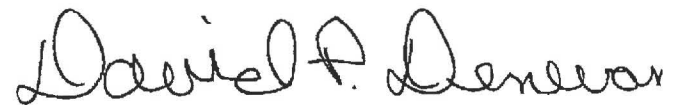
NOTE: Several decades ago, after the local Coastal Commision had put the guidelines in force, the THEN owners of The Breakers removed benches and light fixtures from Victory Park, not replacing them. So please stay alert, informed, and stand up for Victory Park.

10

For 41 years, with other park preservationists, we have successfully fought for park signage, benches, drinking fountains, trash containers and we saved 2 magnificent trees in Santa Cruz Park. There was always a fight against some developer, but we persevered.

11

Sincerely,



David P. Denevan

4322 Charlemagne Ave.

Long Beach, CA 90808

VICTORY PARK DESIGN GUIDELINES

October 26, 1989

Victory Park was deeded to the City in 1889. Since that time the area has historically served as the front yard to the Long Beach Central Business District. Today, the area functions as the major passive linear park in the Greater Downtown.

PURPOSE

Victory Park was formally declared and dedicated for public park purposes in 1980. The purpose of these guidelines is to insure that the land is available for the enjoyment of the citizens and general public of Long Beach. At the same time, the guidelines serve to coordinate the design and renovation of the park to cause a design that is reminiscent of historic Long Beach and reinforces the character of Ocean Boulevard as a grand boulevard.

APPLICABILITY

These guidelines apply to all portions of Victory Park from Alamitos to Golden Avenue and shall govern for both new construction and renovation.

PRINCIPAL USE

The principal use of the park surface is passive and visual public open space.

The following uses and elements are prohibited:

- All private and commercial uses.
- All new driveways, ramps, parking at or above grade, porte cochere, bicycle paths, retaining and freestanding walls or architectural elements not listed as permitted.
- Directional, private and commercial signs.

Between Pacific Avenue and Long Beach Boulevard, mobile commercial vendors and public information kiosks may be permitted, as determined appropriate by the City Planning Commission.

DESIGN CHARACTER

The design shall be developed as an informal landscaped public park.

TOPOGRAPHY

Grading and Drainage:

The northern 75% of the park width shall be graded to appear to be level with the top of curb and sidewalk. The maximum grade permitted is 3.0% starting from the top of curb at Ocean Boulevard and extending to the southern 75% of the park. Drainage shall be accomplished by area drains.

Low berms are permitted in the southern 25% of the park, provided the area is planted with groundcover, shrubs and/or seasonal color. Berms shall not be located in or interfere with required view corridors. Berms shall be informally shaped, with a maximum slope of 2:1 and shall not exceed five feet in height above the top of the Ocean Boulevard curb.



ARCHITECTURAL ELEMENTS

Fountains and Sculptures

- Appropriately designed fountains, and sculptures are permitted in the southern 25% of park (only). It is intended that these features accentuate the park and public usage, while at the same time protect the continuity of the lawn. These features shall not be utilized to accent an entrance to the adjacent development.

Walkway

- One pedestrian walkway is permitted to connect the Ocean Boulevard sidewalk to each development south of the park. The intent is that the walkway be unobtrusive and does not "read" as a major entrance to the adjacent development, nor should the walk serve as a major design element in the park. The walk shall be no greater than 8' in width and shall be surfaced with dark brown honed stone pavers, running bond pattern parallel to the walk length. Pavers shall be as specified by the Public Works Department. One half inch mortar joints shall be provided. The walk shall be flush with the lawn.
- Entrances to the promenade and treatment of required view corridors shall be as specified in the Local Coastal Plan and subject to Site Plan Review.

Mowing Strip

- A 6' wide concrete mowing strip shall be installed to separate lawn areas from groundcover and shrub beds. The strip shall be of natural color and shall be flush with lawn grade.

Seating

- One bench shall be installed for each 60' of frontage. Benches shall be informally spaced and placed directly adjacent to the mowing strip. Benches shall be placed on a natural color concrete pad which shall be the scale dimension as the bench. The concrete pad shall be flush with the lawn. Benches shall be as manufactured by Victor Stanley or approved equal as follows:

Model UB 318-4

Specifications—Bench shall have eighteen (18) wood slats in a reverse contour design, six (6) foot in length. Wood shall be "IPE", 2" x 3" slats with leading edges of the top and bottom slat having large radius finish detail. Leg and center-brace contour bars shall be solid 3/4" thick x 3" wide steel bars. Legs shall be in-ground mount—high-tensile strength 2" square tubular steel welded directly to formed contour bar. All steel shall have "Publicote", powder-coated finish. Bench frame shall include "Unistat" bracket design complete with applicable hardware.



- Sculptural benches may be substituted for that specified, providing that the bench is executed or designed by a recognized artist and the bench is found to be appropriate to the parking design.

Trash Receptacles

- One trash receptacle shall be provided for each 150 linear feet of Ocean Boulevard frontage. Receptacles shall be placed adjacent to the Ocean Boulevard sidewalk upon a concrete pad the size of the container. Receptacles shall be as manufactured by Victor Stanley or approved, equal as follows:

Model HF-24

Specifications—Waste container to be 24 gallon capacity. There shall be 24 - 2" x 3" wood slats attached to "Publicote", powder-coated, treated, welded steel frame. Wood shall be "IPE". Each frame to consist of three (3) steel rings (1/4" x 1" flat steel), welded to eight (8) vertical rods, with eight rods across the base. Lid shall be fiberglass attached by stainless steel aircraft cable. A high density plastic liner shall be provided.

Drinking Fountain

- One drinking fountain shall be provided for each block face. Drinking fountains shall be adjacent to the Ocean Boulevard sidewalk. Drinking fountains shall be as manufactured by Haws, model number B176 concrete aggregate, with number 6610 sand trap or approved equal.
- Sculptural drinking fountains may be substituted for that specified providing that it is executed or designed by a recognized artist and is found to be appropriate to the park design.

Signage

- A sign shall be placed at the intersection of each north/south street and shall contain the following information:

Victory Park
Established in 1889
City of Long Beach

Such signs shall either be in the form of a bronze plaque, flush in the Ocean Boulevard sidewalk or as a monument sign not to exceed two feet in height (from grade) by five feet in length. Such signs shall be in concrete lettering size and styles shall be as specified by the Public Works Department.

PLANTING

- ✓ A double row of palm trees (*Washingtonia robusta*) spaced 30' on center shall be planted on either side of the Ocean Boulevard sidewalk. Palms shall be 20' in height when installed.
- ✓ The northern 75% of the park depth shall be planted in lawn. Sod is mandatory and shall consist of Hybrid Bermuda Hybrid "Marathon".
- ✓ The southern 25% of the park shall be planted and coordinated with groundcover and seasonal color beds, shrubs and trees as follows:

Groundcover perennials and seasonal color beds:

The purpose of these beds is to provide a lush, changing display of seasonal color. Although planting is to be informal, major emphasis shall be placed on coordinated mass.

Shall be evergreen and may consist of Star Jasmine (*Trachelospermum jasminoides*), Lily-of-the-Nile (*Agapanthus africanus*), Bird of Paradise (*Strelitzia*), Saxifraga, (*Saxifraga umbrosa*) as well as seasonal annual color.

The minimum size for groundcover shall be flats planted a maximum of 12" on center. Perennials shall be a minimum of 1 gallon size, planted a maximum of 18" on center. Seasonal color shall be a minimum of "quarts" and planted a maximum of 12" on center.

Shrub Beds:

It is intended that the shrub beds serve as the backdrop for the groundcover and seasonal color.

Low growing shrubs are encouraged, provided there is to be strong coordination with the groundcover and seasonal color. The minimum size for shrubs is 5 gallon, maximum spacing is 3', on center shrubs shall be grouped and planted informally.

The following species are permitted: Azalea sp. Mirror Plant (*Coprosma repens*), Indian Hawthorn (*Raphiolepis indica*), Gardenia (*Gardenia* sp.) Hibiscus (*Hibiscus* sp.)

Trees:

Trees will serve as a backdrop to the park. Primary trees shall be utilized to define the end of the park space. Secondary trees shall be utilized to accentuate and to provide interest. All trees shall be informally spaced. Groupings are preferred over individual plantings.

Primary trees shall consist of Coral trees (*Erythrina caffera*) and Eucalyptus, *sideroxylon*, minimum size 60" box. A minimum of one tree shall be provided for each 36' linear feet of property line. Trees shall be informally planted in the southern 25% of the park per block.

Secondary trees shall be provided at the rate of one tree per 30' of linear frontage, informally spaced and shall be of 48" box size. Secondary trees shall consist of one or more of the following: *Albizia julibrissin*, *Melaleuca leucadendra* or *Mclevey nesophilla*, *Metrosideros tomentosa*, *Ficus Rubiginosa*, *Pinus hallpensis* and *Prunus* sp. (flowering peach is strongly encouraged).

DECORATIVE LIGHTING

Uplighting on palm trees: Each of the palms in the double row of trees at the Ocean Boulevard sidewalk shall be uplighted. Single upright floodlights shall be strapped to the trunk 10 feet above grade to the specification of the Director of Public Works.

Floodlighting of shrubs: Shrubs groundcover, and seasonal color shall be lighted. All light sources shall be concealed.

REQUIRED PLANS

Prior to approval of site plan review, the applicant shall submit three sets of the following working drawings to the Director of Planning and Building:

- grading and drainage plans, which shall include the location of all architectural elements. Plans shall indicate by spot elevation, contours and drainage lines of the topography.
- complete planting plans, specify species, size and location.
- night illumination plans, specify the location and type of fixtures.
- complete irrigation plans.

MAINTENANCE

The landscaping shall be maintained to the standards as established by Public Works Department by the adjacent property owners.

These guidelines have been prepared in cooperation with the following Long Beach Departments:

City Manager's Office
Community Development
Parks and Recreation
Police
Public Works

VICTORY PARK DESIGN GUIDELINES

ADOPTED OCTOBER 26, 1989
LONG BEACH CITY PLANNING COMMISSION
CITY OF LONG BEACH



beachweek

PARK: Condos raise ire

CONTINUED FROM BW1

"These are all symbols of public parks," Denevan said. "If the public doesn't perceive this as a park, they're not going to use it as a park."

The council agreed, telling the developer to include benches in front of the berm where people can see them, add the fountain and erect the signs.

While the landscaping plan is complete, the project has at least one more hurdle to overcome before construction can begin.

Community activist James Sturm filed a petition for a restraining order preventing construction from commencing.

Sturm asserts in his petition that the city is giving away

public land to a private developer.

And he asserts the city is destroying a public park — an area where "many healthy, mature, irreplaceable shade trees (provide shelter for) many kinds of birds, including the endangered migrating spotted-white owl, squirrels and other park creatures."

City Attorney Bob Shannon said he was aware of the filing but had not had an opportunity to review it.

The filing is expected to be heard Dec. 13 in Presiding Judge Tracy Moreno's courtroom.

"We will appear," Shannon said. "We will oppose."

Staff Writer Joe Segura contributed to this report.

Press-Telegram

A8 WEDNESDAY, DECEMBER 12, 2001

NEWS

L.B. approves Bicycle Master Plan

Council: Proposal sets upgrade timing, location to raise bike ridership.

By Jason Gewirtz

Staff writer

LONG BEACH — The city has talked for years about adding new bicycle lanes, paths and routes to its existing network.

On Tuesday, the City Council approved a plan that spells out how, where and when those new routes will be built.

The city's first Bicycle Master Plan offers city planners ways to encourage more people to use pedal power as their mode of transportation.

"A lot of people are going to ride safer because of it," Councilman Ray Grabinski said.

The plan will also allow the city to go after state and federal funding for bicycle improvements, said Tim Price, executive director of Long Beach Cyclists, a bicycle advocacy group.

The plan has a goal of increasing city bicycle ridership by 5 percent over the next 20 years. Included in the plan are short- and long-term goals for where bike paths, lanes and routes should be placed throughout the city.

Also, the plan encourages bicycle education to remind drivers and bike riders of the rules of the road.

New lanes won't appear overnight. Rather, the new plan encourages city officials to make roads more bicycle friendly by adding bicycle lanes or wide shoulders when roads are repaired and re-striped, Price said.

Mariposa dancing

Mariposa restaurant will be able to offer dancing on two more days — Wednesdays and Sundays — as the council approved a new permit Tuesday.

The Police Department had originally opposed the application, citing excessive noise and rowdiness during dancing hours Thurs-

day to Saturday at the 135 Pine Ave. restaurant.

But Tuesday, Police Chief Jerome Lance said the department has been working with Mariposa's owner since then and those problems have been addressed.

The permit approval comes with several conditions, including that the restaurant close its doors and windows when music is played.

Victory Park

Several mature trees will be removed from a grassy area near Ocean Boulevard to make way for a new apartment complex. But the redeveloped park will include new trees, more benches, an extra drinking fountain and signs identifying the area as a park.

The council on Tuesday approved a landscaping plan for the 21-story, 556-unit Genesis Realty project, which will be built between Linden Avenue and Hart Place.

About 20 of the 58 mature trees will be destroyed: 38 will be

removed and replanted in the park. The area is part of Victory Park, which extends along the south end of Ocean Boulevard from Alamitos Avenue to Cedar Avenue. The park includes the grassy areas in front of most high-rises on the south side of Ocean Boulevard.

Resident David Denevan argued for the benches, fountains and signs saying people should be encouraged to use the park.

Fast food

Plans for a Taco Bell at the northeast corner of Long Beach Boulevard and Wardlow Road won approval Tuesday, but the City Council denied a drive-through lane and window for the project.

Several residents argued that the lane would attract too much traffic and trash to the area. Grabinski, whose 7th District includes the site, agreed.

"I don't think this is a good thing for the community," he said.

LAST MINUTE COMPROMISE DEAL

Additional Signs, Benches Lead To Approval For Victory Park Plan

By Kurt Helin
Editor

After a couple of last-minute changes, the City Council became the latest — and last — body to approve a plan to tear up and rebuild a portion of Victory Park downtown as part of construction of a new condominium complex.

The council backed the plan with a unanimous vote, after concerns about the size of signs in the park and other amenities that will make the redone area look and feel more like a park.

While that was a victory for some park activists, others that were looking to stop the adjacent condominium project or to save some of the larger trees currently on the site fell short of their goals. One activist on the issue — Jim Sturm — said he had filed a lawsuit aimed at blocking both the changes to the park and the condo project.

That condominium project and the plans for the park have stirred the ire of some activists since they were announced more than a year ago. Called the Ocean Villas condominiums, the two 18-story towers will be built by Dallas-based developer Genesis Realty. The \$75 million project is located on the south side of Ocean Boulevard bisected by Elm Avenue. Last week, the Redevelopment Agency granted the developer three more months to start work, pushing a start date back to March of next year.

Fronting the property — as with other recently-built condominium projects along the south side of Ocean Boulevard east of Alamos — is Victory Park. Called for in 1898, re-dedicated by the council in 1980, the park is supposed to honor the nation's veterans.

Park activists have said that instead, the park has been ignored by city officials and has been taken over by the owners of the large condominium and office owners that have gone up along Ocean Boulevard. Some council members agreed that the park has not always been thought of as a park.

"What has happened in the last 30 years is we forgot this was a park for the people and we have to put in amenities for the people," said Seventh District Councilman Ray Grabinski.

Genesis proposes an underground parking structure for its project that would extend under Victory Park, something that is permitted in the Local Coastal Plan, city staff told the council members (although some activists questioned that). However, to do that will involve tearing up part of the park and rebuilding it afterward.

Of the 58 trees on the site, 38 would be taken out then replanted after the work, according to the plans. However, the largest and most recognizable trees on the site would be removed permanently and destroyed, something that park activist Ann Cantrell and others said should not happen. City officials said the trees are diseased and would not survive a move to another location. When the park is replanted, there will be 25 new coral trees, 21 rusty fig leaf trees and an assortment of other new plants.

Where activists earned a victory was a push to have the park look and feel like a park. In the design presented to the council, following the park guidelines, the first two-thirds of the park is

flat and at the level of Ocean Boulevard. Behind that is a berm where most of the plants would be, and behind that berm were the benches and fountains.

"All I'm asking for today is (park) signs large enough to be seen from Ocean Boulevard, another drinking fountain and park benches in front of the berm," said David Denevan, one of the people who appealed the ap-

proval of the landscaping to the council.

Denevan and the project developers talked at the meeting while council members and other members of the public spoke, and in the end came to a compromise deal that includes Denevan's demands.

With that compromise, the council members had no problem supporting the park plan.

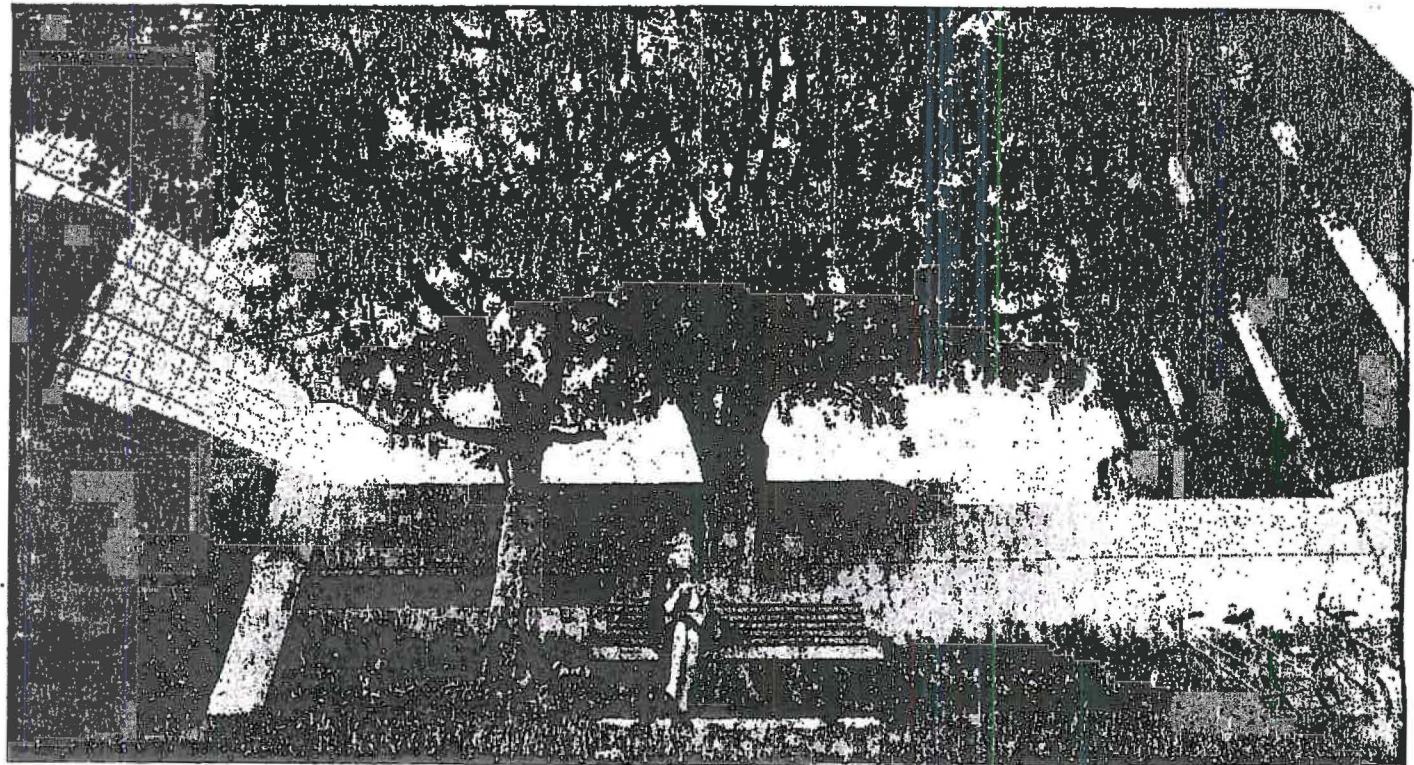
Long Beach

The City Council on Tuesday asked the city manager to investigate a resident's complaint that Atlantic Richfield Co. apparently was violating an agreement to retain public access to the remnants of an abandoned municipal park that forms part of the site of the oil firm's new downtown office building.

Resident David Denevan told the council in a letter that a security guard recently ejected him from the 40-foot-wide landscaped strip in front of the Arco Towers. The guard said the area was private property, Denevan wrote.

He asked the council to order Arco to place a sign identifying the area as public property. The blocklong strip was once a part of Santa Cruz Park, built in 1889 south of West Ocean Boulevard and later abandoned by the city.

The council acted unanimously and without debate.



PRESS-TELEGRAM/ROGER COAR

New look for old L.B. park

Santa Cruz Park, a 94-year-old downtown park that ranks as one of the city's oldest, was reopened Wednesday. And Emmeline Miller, a longtime Long Beach resident, made immediate use of one of its new

benches to pass some time knitting. The small park, noted for its towering old eucalyptus and Moreton Bay fig trees, is located on Ocean Boulevard between the new Arco Towers and the Union Bank building.

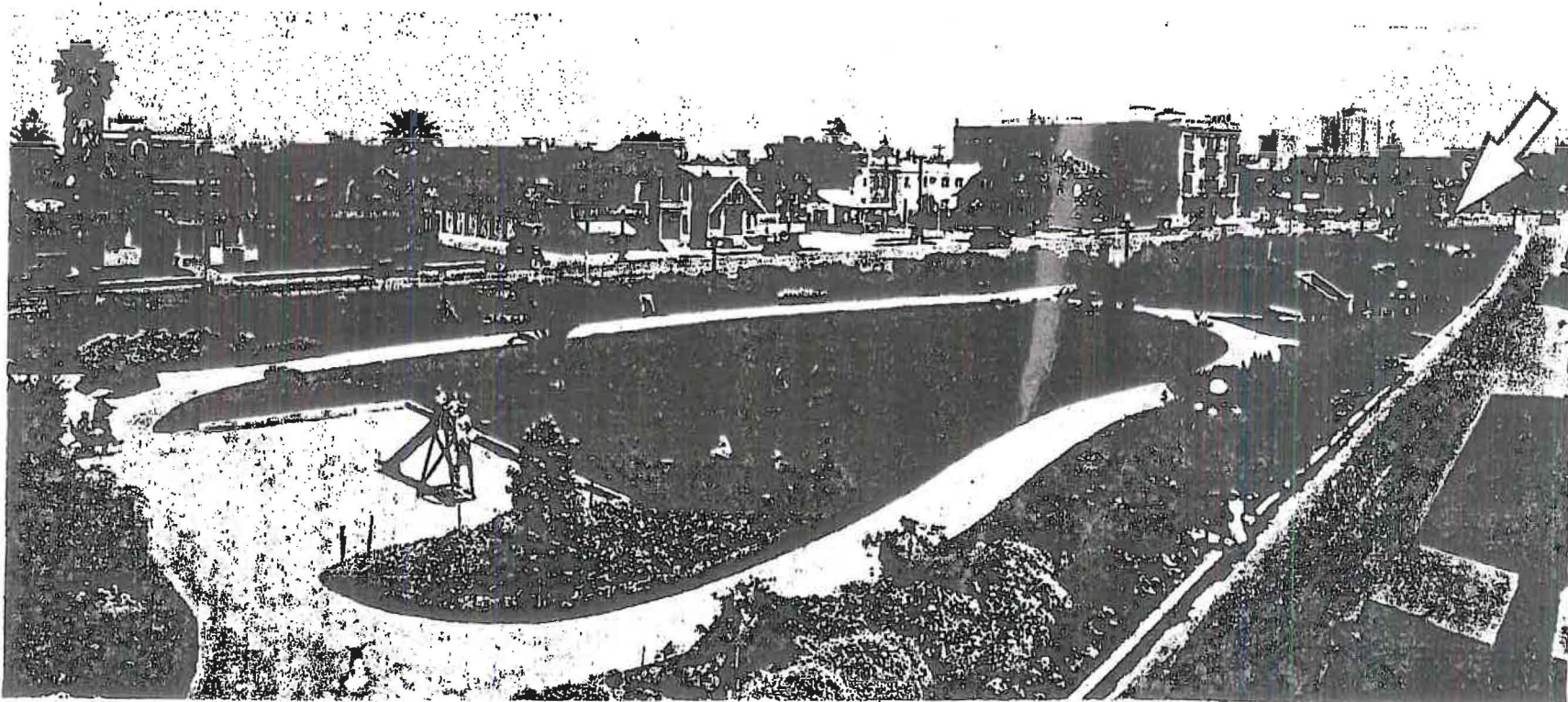
SECTION B/PRESS-TELEGRAM/THURSDAY, JUNE 30, 1983

SANTA CRUZ PARK PICNIC

YOU ARE CORDIALLY INVITED TO ENJOY A "BROWN BAG" PICNIC IN THE SHADE OF SANTA CRUZ PARK'S MAJESTIC MORETON BAY FIG TREES. HELP US CELEBRATE THE REOPENING OF ONE OF OUR CITY'S OLDEST PARKS (ESTABLISHED IN 1889). THERE WILL BE A RIBBON CUTTING CEREMONY.

NOON WEDNESDAY, JUNE 29th
700 WEST OCEAN BOULEVARD

(In Front of Arco Center)



Santa Cruz Park. Circa 1926. View looking north toward Ocean Boulevard. Photo was taken from a location that is presently occupied by the Union Bank Building. The Olmsted firm, which planned New York Central Park and the U.S. Capitol grounds, designed the Long Beach park in 1923. Arrow points to eucalyptus sapling, now one of the old park's three surviving trees. The trees are among the largest in the Downtown area.

In the 1970's the park was reduced in size by West Beach redevelopment and widening of Ocean Boulevard. At the request of a dozen citizen groups, the Redevelopment Agency, City Council and Planning Commission agreed to

preserve the remainder of the park for public use. New lawns, oak benches and a drinking fountain were recently installed. Santa Cruz Park's greenery and connection with the City's early history complements the adjacent glass and steel office towers.

Homeowners Downtown Associates, sponsor of the picnic, will dedicate the vestpocket park to the memory of the late Grace Rose, Minta Springer and Admiral Lawrence Ruff, three of the many people who worked to save the park and its stately trees.

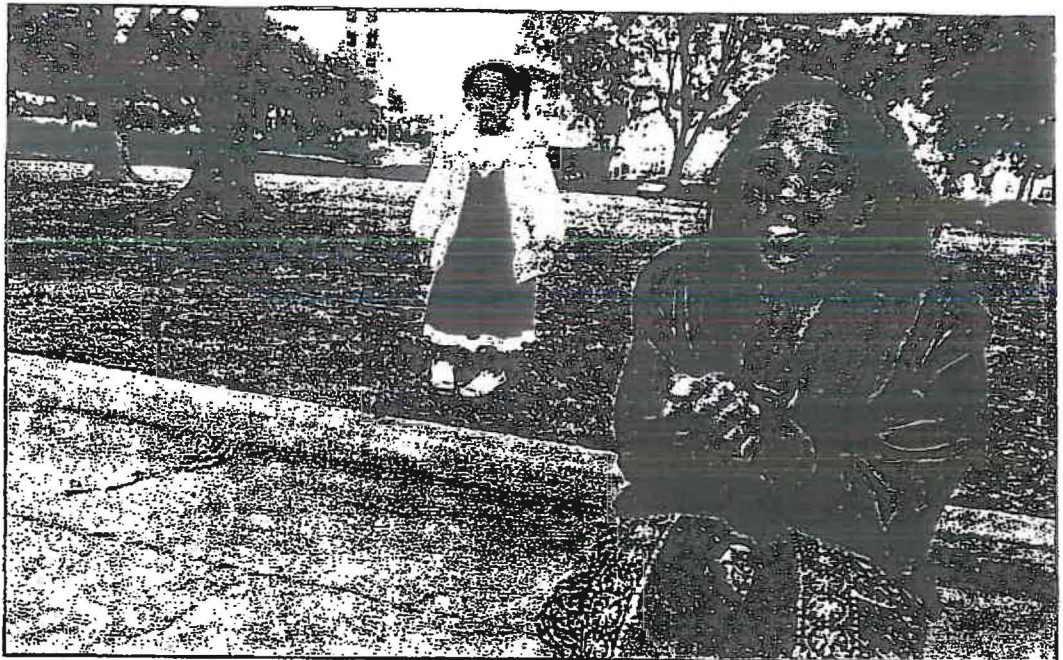
Takeover of Long Beach Park Space Stirs Debate

By DAN WEIKEL
TIMES STAFF WRITER

In 1889, two public parks that formed a mile-long promenade of flower beds, eucalyptus and Moreton Bay fig trees on the coastal bluffs of downtown Long Beach were dedicated in perpetuity for recreation. Today, Santa Cruz and Victory parks along Ocean Boulevard don't seem so public anymore.

Modern office buildings, high-rise condos, walls, steps and drive-ways encroach on much of the land. Giant slabs of modern sculpture and 18 commercial real estate signs also intrude, most of them without permission.

Passersby who venture onto some of the remaining parcels risk being shooed away by security guards.



KEN LUBAS Los Angeles Times

Traci Wilson-Kleekamp and daughter Erin visit Stearns Champions Park, which she helped save.

Over the decades, downtown development decisions by City Hall have transformed Victory and Santa Cruz into little more than landscaping for private property. Such cannibalizing of parkland for

uses other than public recreation has been a regular occurrence in Long Beach, already affecting or threatening an estimated 20 sites.

Now, a public outcry is growing over those losses and ongoing at-

tempts by local government to take recreational areas for other uses. Consequently, elected officials are beginning to rethink guidelines for the city's 70 parks.

Please see **PARKS, B2**

LOS ANGELES TIMES

TUESDAY, FEBRUARY 13, 2001

12

PARKS: History of Takeovers Stirs Debate

Continued from B1

Last week, a City Council committee embarked on a plan to inventory recreational land, identify new park sites and give citizens more of a say in how their parks will be used. The panel also held the first in a series of public hearings on the issue.

"A lot of people have been waiting a long time for this," said City Councilman Ray Grabinski, who proposed the park meeting. "We need to make sure that no short-term gain takes away from the long-term gain of saving what we have and acquiring more land for parks and open space."

Long Beach, which is the state's fifth-largest city, has about 2,500 acres of parkland, including beaches, municipal golf courses and public school playgrounds. The parks vary in size from so-called pocket parks of less than half an acre to massive El Dorado Park with 650 acres.

The National Recreation and Parks Assn. recommends that cities have a minimum of 10 acres of parks per 1,000 residents. But Long Beach has about six acres per 1,000, less than many major metropolitan areas, including New York City.

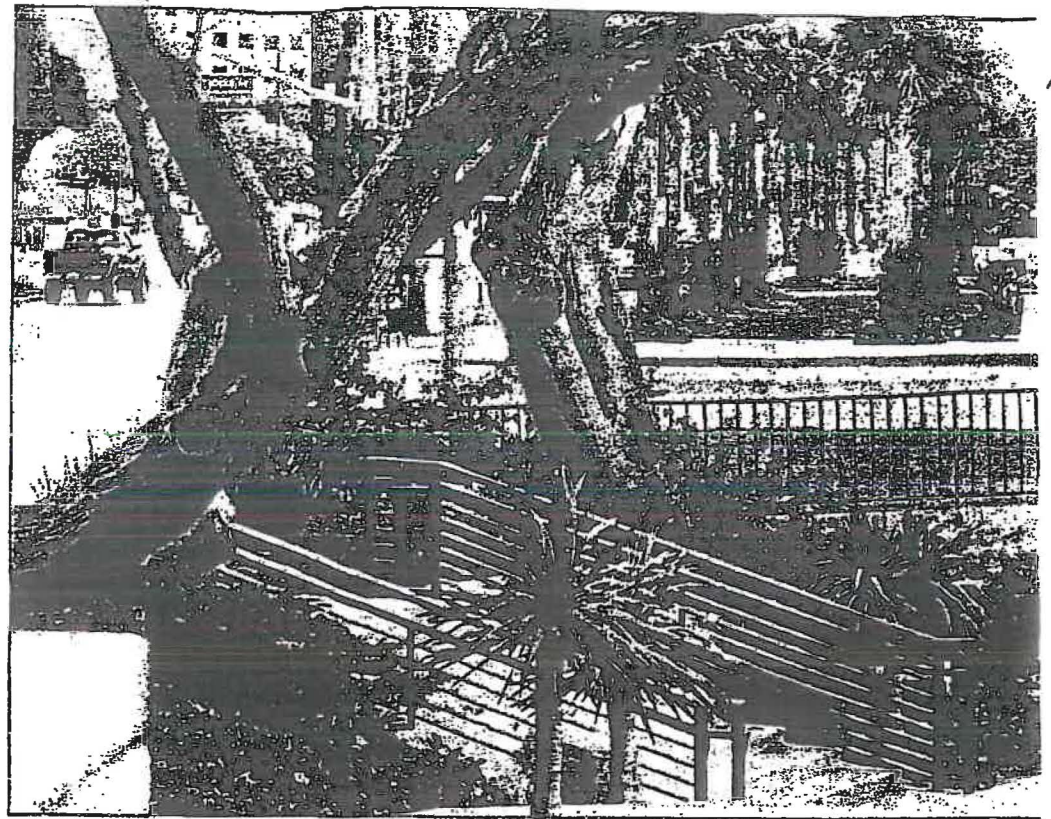
More Space in Affluent Areas

Most of the recreational land is concentrated on the city's affluent east side. The 3rd and 5th council districts, for example, have four acres and 18 acres of parks per 1,000 residents, respectively. The 1st Council District in downtown, among the poorest, has less than half an acre per 1,000 residents.

Preservationists say that demand for parks is growing with the population and that Long Beach should end its long history of trying to put private and non-recreational facilities on public parkland.

Much of Lincoln Park, the city's first and perhaps most famous, was taken in the 1970s for a massive expansion of the main library and construction of a concrete plaza in front of the new City Hall.

A temporary police station sits in Scherer Park. Heartwell Park contains a large day care center. El



Driveways and stairs have replaced grass in some parts of Santa Cruz Park in Long Beach

stations, government buildings, freeways and redevelopment projects now sit on what was once other parkland or public beaches.

Still other recreational lands have been lost due to subsidence from oil drilling, changes in the city master plan, and expansion of the Port of Long Beach, one of the busiest harbors in the nation.

Victory and Santa Cruz parks, which run from Golden Shore to Alamitos Boulevard, have practically been erased by commercial development approved by the city over the last three decades.

"It's been a giveaway and the slow privatization of public land," said Lester Denevan, a former city planner, whose complaints about illegal real estate signs in both parks are being reviewed by Long Beach park officials.

Preservationists and city officials partly blame the situation on a lack of clear guidelines designating what can be built on parkland. Long Beach, they say, has never formally differentiated its parks from other city property.

"We need direction for the future," said city Parks Director Phil Hester. "There needs to be a balance between open space, natural areas, recreational facilities and government uses."

Under current zoning, day-care centers, preschools, communication towers, parking lots, certain private clubs, community service organizations and school play

grounds, as well as government buildings, can be located in parks.

The ordinance is "too broad," said Pat Garrow, a Long Beach city planner. "There should be open space and recreational uses. As far as other structures [are concerned], I would like to see us draw a line somewhere."

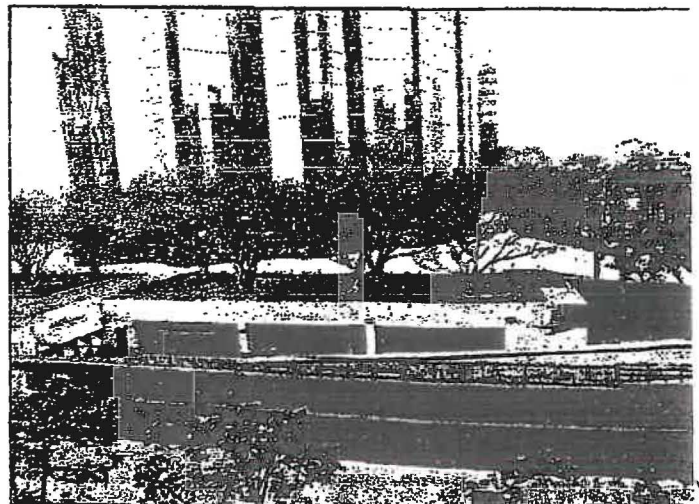
But park advocates and neighborhood leaders contend that vague laws aren't the only culprits. In some cases, they say, city officials have viewed building in parks as a way to hold down the cost of municipal projects and prevent private property from being removed from the tax rolls.

"Parks should not be looked

upon as building pads," said David A. Sundstrom, a member of an environmental task force that helped develop the city's strategic plan. "We can't afford to burn park space whenever someone's project comes up."

Sundstrom and others, including some city officials, say using park land for other projects is shortsighted, considering the high cost of acquiring urban parkland. The property for 12-acre Cesar Chavez Park, the city's newest, cost about \$1 million an acre.

To open-space advocates and city officials, the park meeting represents an important juncture after seven years of almost uninter



Photos by KEN LUBAS / Los Angeles Times

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CITY OF LONG BEACH

DEPARTMENT OF DEVELOPMENT SERVICES

333 West Ocean Blvd., 5th Floor

Long Beach, CA 90802

(562) 570-6194

FAX (562) 570-6068

PLANNING BUREAU

APPLICATION FOR APPEAL

An appeal is hereby made to Your Honorable Body from the decision of the

- ☐ Site Plan Review Committee
- ☐ Zoning Administrator
- ☒ Planning Commission
- ☐ Cultural Heritage Commission

Which was taken on the 15th day of November, 2018.

Project Address: 210 East Ocean Boulevard, Long Beach CA

I/We, your appellant(s), hereby respectfully request that Your Honorable Body **reject** the decision and ☐ Approve / ☒ Deny the application or permit in question.

ALL INFORMATION BELOW IS REQUIRED

Reasons for Appeal: See attached Appeal Letter

Appellant Name(s): Danielle Wilson

Organization (if representing) UNITE HERE Local 11

Address: 464 Lucas Ave. #201

City Los Angeles State CA ZIP 90017 Phone 213-481-8530

Signature(s) Danielle Wilson Date 11/26/18

- A separate appeal form is required for each appellant party, except for appellants from the same address, or an appellant representing an organization.
- Appeals must be filed within 10 days after the decision is made (LBMC 21.21.502).
- You must have established *aggrieved* status by presenting oral or written testimony at the hearing where the decision was rendered; otherwise, you may not appeal the decision.
- See reverse of this form for the statutory provisions on the appeal process.

BELOW THIS LINE FOR STAFF USE ONLY

☐ Appeal by Applicant

☒ Appeal by Third Party

Received by: MC

Case No.: APL18-002

Appeal Filing Date: 11/26/18

Fee: \$100

☒ Fee Paid

Project (receipt) No.: PLNB43781

LICENSED CONTRACTORS DECLARATION				WORKER'S COMPENSATION DECLARATION																																																																																			
<p>I hereby affirm that I am licensed under provisions of Chapter 9 (Commencing with Section 7000) of Division 3 of the Business and Professional Code, and my license is</p> <p>License _____ License _____</p> <p>Dat _____ Contract _____</p>				<p>____ I have and will maintain workers' compensation insurance, as required by Section 3700 of the Labor Code, for the performance of the work for which this permit is issued. My workers' compensation insurance carrier and policy number are:</p> <p>Carrier _____ Policy _____</p> <p>(This Section need not be completed if the permit is for one hundred dollars (\$100) or less)</p> <p>____ I certify that in the performance of the work for which this permit is issued, I shall not employ any person in any manner so as to become subject to the workers' compensation laws of California, and agree that if I should become subject to the workers' compensation provisions of Section 3700 of the Labor Code, I shall</p> <p>Dat _____ Applica _____</p>																																																																																			
<p style="text-align: center;">OWNER-BUILDER DECLARATION</p> <p>I hereby affirm that I am exempt from the Contractors License Law for the following reason (Sec.7031 California Business and Professional Code: Any City which requires a permit to construct, alter, improve, demolish or repair any structure prior to its issuance also requires the applicant for such permit to file a signed statement that he is a licensed contractor pursuant to the provisions of the Contractors License Law (Ch.9) (Commencing with Sec.7000 of Div.3 of the B. & P. C.) or that he is exempt therefrom and the basis for the alleged exemption. Any violation of Sec.7031.5 by any applicant for a permit subjects the applicant to a civil penalty of not more than five hundred dollars (\$500.00).):</p> <p>• I as owner of the property, or my employees with wages as their sole compensation, will do the work and the structure is not intended or offered for sale (Sec.7044, B. & P. C. : The Contractors License Law does not apply to an owner of property who builds or improves thereon, and who does such work himself or through his own employees, provided that such improvements are not intended or offered for sale. If, however, the building or improvements is sold within one year of completion, the owner-builder will have burden of proving that he did not build or improve for the</p> <p>• I am exempt under _____, B. & P. C. for this _____</p> <p>Dat _____ Owne _____</p>				<p>WARNING: FAILURE TO SECURE WORKERS' COMPENSATION COVERAGE IS UNLAWFUL AND SHALL SUBJECT AN EMPLOYER TO CRIMINAL PENALTIES AND CIVIL FINES UP TO ONE HUNDRED THOUSAND DOLLARS, IN ADDITION TO THE COST OF COMPENSATION DAMAGES AS PROVIDED FOR IN SECTION</p> <p>I hereby state that there is a construction lending agency for the performance of the work for which this permit is issued (Sec.3907, Civ. C.).</p> <p>Lender's _____</p> <p>***</p> <p>Lender's _____</p> <p>I certify that I have read this application and state that the above information is correct. I agree to comply with all City and State laws relating to the building construction, and hereby authorize representatives of this city to enter upon the</p> <p>_____ Signature of Owner or Contractor</p> <p>_____ Date</p>																																																																																			
<p style="text-align: center;">-IMPORANT -</p> <p>Application is hereby made to the Superintendent of Building and Safety for a permit subject to the conditions and restrictions set forth on the front faces of this application</p> <p>1. Each person upon whose behalf this application is made and each person at whose benefit work is performed under or pursuant to any permit issued as a result of this application agrees to and shall indemnify and hold harmless the City of Long Beach its officers, agents, and employees from any liability arising out of the issuance of any permit from this application.</p> <p>2. Any permit issued as a result of this application becomes null and void if work is</p>				<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width: 33%; padding: 2px;"> JOB ADDRESS 210 OCEAN BLVD </td> <td style="width: 16.5%; padding: 2px;"> RECEIPT NO. 03407958 </td> <td style="width: 16.5%; padding: 2px;"> DATE 11/26/18 </td> <td style="width: 34%; padding: 2px;"> PROJECT NO. PLNB43781 </td> </tr> <tr> <td colspan="3" style="padding: 2px;"> JOB DESCRIPTION Third Party Appeal of 1806-19 </td> <td style="padding: 2px;"> AREA 0 </td> </tr> <tr> <td colspan="2" style="padding: 2px;"> OWNER LONG BEACH PROPERTY LLC </td> <td colspan="2" style="padding: 2px;"> OCCUPANCY MIXED USES </td> </tr> <tr> <td colspan="2" style="padding: 2px;"> ADDRESS 22900 VENTURA BLVD 200 </td> <td colspan="2" style="padding: 2px;"> ASSESSOR NO. PD-6 </td> </tr> <tr> <td style="padding: 2px;"> CITY WOODLAND HILLS CA </td> <td style="padding: 2px;"> STATE CA </td> <td style="padding: 2px;"> ZIP CODE 91364-1279 </td> <td style="padding: 2px;"> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width: 16.5%;">FSB</td> <td style="width: 16.5%;">S</td> <td style="width: 16.5%;">RSB</td> <td style="width: 50%;">CENSUS TRACT</td> </tr> <tr> <td></td> <td></td> <td></td> <td>576100</td> </tr> </table> </td> </tr> <tr> <td colspan="4" style="padding: 2px;"> APPLICANT DANIELLE WILSON </td> </tr> <tr> <td colspan="4" style="padding: 2px;"> CONTRACTOR </td> </tr> <tr> <td colspan="4" style="padding: 2px;"> ADDRESS </td> </tr> <tr> <td colspan="2" style="padding: 2px;"> CITY </td> <td colspan="2" style="padding: 2px;"> STATE </td> </tr> <tr> <td colspan="2" style="padding: 2px;"> ZIP CODE </td> <td colspan="2" style="padding: 2px;"> PHONE NO. </td> </tr> <tr> <td colspan="2" style="padding: 2px;"> STATE LICENSE NO. </td> <td colspan="2" style="padding: 2px;"> CITY LICENSE NO. </td> </tr> <tr> <td colspan="2" style="padding: 2px;"> ARCHITECT/ENGINEER </td> <td colspan="2" style="padding: 2px;"> LICENSE NO. </td> </tr> <tr> <td colspan="4" style="padding: 2px;"> ADDRESS </td> </tr> <tr> <td colspan="2" style="padding: 2px;"> CITY </td> <td colspan="2" style="padding: 2px;"> STATE </td> </tr> <tr> <td colspan="2" style="padding: 2px;"> ZIP CODE </td> <td colspan="2" style="padding: 2px;"> PHONE NO. </td> </tr> <tr> <td style="padding: 2px;"> VALUATION 0.00 </td> <td style="padding: 2px;"> PRESENT BLDG USE </td> <td style="padding: 2px;"> PROPOSED BLDG USE </td> <td style="padding: 2px;"> BLDG HEIGHT 0 </td> </tr> <tr> <td colspan="4" style="padding: 2px;"> TYPE OF CONSTRUCTION APPTHPTY </td> </tr> <tr> <td colspan="4" style="padding: 2px;"> LEGAL DESCRIPTION </td> </tr> </table>				JOB ADDRESS 210 OCEAN BLVD	RECEIPT NO. 03407958	DATE 11/26/18	PROJECT NO. PLNB43781	JOB DESCRIPTION Third Party Appeal of 1806-19			AREA 0	OWNER LONG BEACH PROPERTY LLC		OCCUPANCY MIXED USES		ADDRESS 22900 VENTURA BLVD 200		ASSESSOR NO. PD-6		CITY WOODLAND HILLS CA	STATE CA	ZIP CODE 91364-1279	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width: 16.5%;">FSB</td> <td style="width: 16.5%;">S</td> <td style="width: 16.5%;">RSB</td> <td style="width: 50%;">CENSUS TRACT</td> </tr> <tr> <td></td> <td></td> <td></td> <td>576100</td> </tr> </table>	FSB	S	RSB	CENSUS TRACT				576100	APPLICANT DANIELLE WILSON				CONTRACTOR 				ADDRESS 				CITY 		STATE 		ZIP CODE 		PHONE NO. 		STATE LICENSE NO. 		CITY LICENSE NO. 		ARCHITECT/ENGINEER 		LICENSE NO. 		ADDRESS 				CITY 		STATE 		ZIP CODE 		PHONE NO. 		VALUATION 0.00	PRESENT BLDG USE 	PROPOSED BLDG USE 	BLDG HEIGHT 0	TYPE OF CONSTRUCTION APPTHPTY				LEGAL DESCRIPTION 			
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UNITE **HERE!** Local 11

464 Lucas Ave., Suite 201 • Los Angeles, California 90017 • (213) 481-8530 • FAX (213) 481-0352

November 26, 2018

VIA HAND DELIVERY:

City Council, City of Long Beach
333 West Ocean Blvd., 4th Floor
Long Beach, CA 90802

Re: Item No. 18-082PL, Planning Commission Hearing 11/15/18; Breakers Hotel Project (210 E. Ocean Blvd.); Categorical Exemption Case No. CE-18-152; Site Plan Review Case No. SPR18-033; Local Coastal Development Permit LCDP18-022

Dear Honorable City Council Members:

On behalf of UNITE HERE Local 11, Jeremy Arnold, and José Nuñez Díaz (“Appellants”), we respectfully provide the City of Long Beach (“City”) with the following appeal (the “Appeal”) of the Planning Commission’s approval of categorical exemption (“CE”) from the California Environmental Quality Act, Pub. Res. Code § 21000 *et seq.*, (“CEQA”) and various land use approvals (“Entitlements”) for the Breakers Hotel project (“Project”).

As discussed below, the Project does not qualify for any of the four different classes of categorical exemption the Applicant seeks (Class 1, Class 3, Class 31, and Class 32). The proposed Project would convert a currently out-of-use building into a 185-room hotel with rooftop pool, bar, restaurant and retail uses. Such a dramatic change in use could have a significant impact on traffic, air quality, noise, land use, and historical resources. Appellants are also concerned about the Project’s compliance with the Long Beach Municipal Code (“LBMC”), including inconsistencies with applicable land use plans. Additionally, the required findings could not be made for the requested entitlements for similar and additional reasons.

Appellants’ objections were explained in a November 15, 2018 comment letter attached hereto as Exhibit A. At the Planning Commission hearing on November 15, 2018, verbal remarks were made in response to the comment letter without supporting evidence or sufficient justification for rejecting Appellants’ concerns. Due to insufficient analysis of potential impacts on the environment under CEQA and inconsistencies with the LBMC, Appellants respectfully urge the City Council to **reverse the Planning Commission’s decisions and withhold all Entitlements until a CEQA-compliant IS and EIR or MND is prepared for the Project.**

This Appeal is made to exhaust remedies under Pub. Res. Code § 21177 concerning the Project and incorporates by this reference in their entirety all written and oral comments submitted on the Project by any commenting party or agency.

1. Reasons for this Appeal

Appellants challenges this Project chiefly on two grounds: (1) The Project does not qualify for any categorical exemption, and (2) the required findings for the requested Entitlements cannot be made. As discussed herein, the Project does not meet the requirements for Class 1, Class 3, Class 31, or Class 32 categorical exemptions and an EIR or MND must therefore be prepared. Additionally, the required findings for the Entitlements cannot be made due to inconsistencies with applicable land use plans, including the Downtown Shoreline Shoreline Planned Development District (PD-6), General Plan Land Use District Number 7 (LUD 7), and Chapter 3 of the Coastal Act.

2. Appellants Have Standing and Are Aggrieved

Mr. Arnold is a Long Beach resident living approximately 0.8 miles from the Project site. Mr. Díaz lives approximately 1.1 miles from the Project site. Such geographic proximity alone is sufficient to establish standing under CEQA. *See Bozung v. LAFCO* (1975) 13 Cal.3d 263, 272 (plaintiff living 1,800 feet from annexed property has standing to challenge the annexation); *see also Citizens Ass'n for Sensible Dev. v. County of Inyo* (1985) 172 Cal.App.3d 151, 158 (“a property owner, taxpayer, or elector who establishes a geographical nexus with the site of the challenged project has standing.”). Furthermore, absent adequate analysis and full mitigation of Project-related impacts, Appellants will be adversely affected by the Project’s impacts on traffic. Hence, Appellants have a beneficial interest in the Project’s compliance with CEQA. *See Braude v. City of Los Angeles* (1990) 226 Cal.App.3d 83, 87.

Local 11 represents more than 30,000 workers employed in hotels, restaurants, airports, sports arenas, and convention centers throughout Southern California and Arizona. Members of Local 11, including over 500 who work in Long Beach and many Long Beach residents, join together to fight for improved living standards and working conditions. As such, Local 11 is a stakeholder in this Project, and worker and labor organizations have a long history of engaging in the CEQA process to secure safe working conditions, reduce environmental impacts, and maximize community benefits. The courts have held that “unions have standing to litigate environmental claims.” *Bakersfield Citizens v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1198.

Furthermore, Appellants submitted a letter to the City during its consideration of the Project regarding the insufficient analysis of the Project’s potential impacts on the environment. It is well established that any party, as Appellants here, who participates in the administrative process can assert all factual and legal issues raised by anyone. *See Citizens for Open Government v. City of Lodi* (2006) 144 Cal.App.4th 865, 875.

3. Agency Erred and Abused Its Discretion

When granting the Project Approvals, the Planning Commission abused its discretion by (1) failing to prepare a CEQA-required EIR or MND, and (2) granting Entitlements when the Project conflicts with City and State plans and codes.

First, the Planning Commission erred in ruling that the Project is exempt under CEQA and does not need to undergo any further environmental review. Under CEQA there is a strong

presumption in favor of requiring the preparation of an EIR, especially when substantial evidence establishes a “fair argument” that a project may have a significant effect on the environment. *See Laurel Heights Improvement Ass’n v. Regents of the Univ. of Cal.* (1993) 6 Cal. 4th 1112, 1123; *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75. Substantial evidence includes facts, reasonable assumptions, and expert opinions supported by facts. *See Pub. Res. Code* §§ 21080(e), 21082.2(c); CEQA Guidelines §§ 15064(f)(5), 15384.

The fair argument standard is a “low threshold” that requires lead agencies to prepare an EIR whenever there is a reasonable probability or inferences that a project may cause significant effects on the environment – regardless of other evidence in the record or even if the project is beneficial. *See e.g., No Oil, Inc.*, 13 Cal.3d at 83-84; *Parker Shattuck Neighbors v. Berkeley City Council* (2013) 222 Cal.App.4th 768, 776; *Friends of “B” Street v. City of Hayward* (1980) 106 Cal.App.3d 988, 1002; *see also Pub. Res. Code* §§ 21100, 21151; CEQA Guidelines §§ 15063(b)(1), 15384(a). Here, there is substantial evidence establishing a fair argument that the Project may cause a significant environmental impact. Under the “low threshold” governing the “fair argument” standard, the City cannot grant this Project approvals until a MND or EIR has been prepared, even if other substantial evidence supports the opposite conclusion. *Mejia v. Los Angeles* (2005) 130 Cal.App.4th 322; *Pocket Protectors v. Sacramento* (2005) 124 Cal.App.4th 903. A lead agency’s decision not to require an EIR can be upheld only when there is no credible evidence to the contrary. *Sierra Club v. County of Sonoma* (1992) 6 Cal. App. 4th 1307, 1318.

Further, exceptions to categorical exemptions also exist within the CEQA Guidelines, requiring agencies to perform an Initial Study (“IS”) and further environmental review whenever a project is subject to one of the “exceptions-to-the-exemptions.” *See CEQA Guidelines* § 15300.2. Moreover, lead agencies may not avoid conducting an IS by merely adopting mitigation measures into a project. *See Salmon Protection & Watershed Network v. County of Marin* (2004) 125 Cal.App.4th 1098, 1102 (holding project must be reviewed under CEQA when mitigation was required to avoid triggering sensitive environment, significant impact, or cumulative impacts exceptions to the use of categorical exemptions); *see also Azusa Land Reclamation Co. v. Main San Gabriel Basin Watermaster* (1997) 52 Cal.App.4th 1165, 1200 (observing CEQA Guidelines do not authorize consideration of mitigation measures with the categorical exemption and that the project required at minimum an MND). The Appellants argue that even if a categorical exemption is found for this Project, the Project is subject to exceptions-to-the-exemptions.

Second, the Planning Commission abused its discretion by failing to make necessary findings supported by substantial evidence to grant the Entitlements and disregarded inconsistencies with City and State land use plans and zoning. The Project’s design and use are inconsistent with various goals, policies, or codes in the Long Beach General Plan, Long Beach Municipal Code, Downtown Shoreline Area Plan, and Local Coastal Program.

4. Specific Points at Issue

As previously mentioned, Appellants raised numerous issues involving the Project in a comment letter presented to the Planning Commission (Exhibit A). As fully discussed therein,

the Project does not qualify for any categorical exemption. Their objections include but are not limited to:

- The Project does not qualify for a Class 1 categorical exemption because the Project involves a radical change in use and includes alterations and changes of use which are not “minor” or “negligible” (CEQA Guidelines § 15301);
- The Project does not qualify for a Class 3 categorical exemption because the Project does not involve the construction or conversion of new, small facilities or structures and also involves significant modifications to the exterior of the structure (CEQA Guidelines § 15303);
- The Project does not qualify for a Class 31 categorical exemption because the Project involves a radical change in use, which is much more than a simple restoration of an historic landmark (CEQA Guidelines § 15331);
- The Project does not qualify for a Class 32 categorical exemption because the Project is inconsistent with the applicable general plan (CEQA Guidelines § 15332(a)) and because it cannot be readily perceived that the Project will not result in any significant effects related to traffic, noise, air quality or water quality (CEQA Guidelines § 15332(d));
- Exceptions-to-the-exemptions apply under CEQA Guidelines § 15300.2 due to significant cumulative impacts and impacts on historical resources.

Additionally, Appellants object to the Planning Commission’s approval of the Entitlements because the required findings cannot be made without curing inconsistencies with applicable land use plans and state law, including but not limited to:

- Required findings to approve the requested Site Plan Review cannot be made: The Project is not “harmonious, consistent, and complete within itself” due to potential disruptive interactions between the Project and abutting park. LBMC § 21.25.506(A)(1));
- The Project proposes to remove significant mature trees from the site LBMC § 21.25.506(A)(3);
- Required findings to approve the requested Conditional Use Permit cannot be made: The Project must be “consistent with and carries out the General Plan, any applicable specific plans such as the local coastal program and all zoning regulations of the applicable district,” but elements of the Project conflict with the elements of the Long Beach General Plan and the Downtown Shoreline Area Plan to provide affordable visitor options. LBMC § 21.25.206(A));
- The Applicant does not show sufficient evidence that the Project may be granted an alcohol license in an area that is already oversaturated with on-sale alcohol licenses as reported by the Department of Alcohol Beverage Control;
- The required findings cannot be made for the Local Coastal Development Permit because the Project does not provide low-cost visitor accommodations and therefore conflicts with the public access and recreation policies of Chapter 3 of the Coastal Act.

Appellants reserve the right to supplement these comments at future hearings and proceedings for this Project. *See, e.g., Cmtys. For a Better Env’t v. City of Richmond* (2010) 184 Cal.App.4th 70, 86 (invalidating EIR based on comments submitted after completion of Final

EIR); *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1120 (holding that CEQA litigation is not limited only to claims made during the EIR comment period).

Finally, Appellants request, to the extent they are not already on the notice list, all notices of CEQA actions, Appeal hearings, and any approvals, Project CEQA determinations, or public hearings to be held on the Project under state or local law requiring local agencies to mail such notices to any person who has filed a written request for them. See Pub. Res. Code §§ 21080.4, 21083.9, 21092, 21092.2, 21108, 21167(f); Gov. Code § 65092. Please send notice by email to danielle.wilson@unitehere11.org (cc: cdu@unitehere11.org).

Thank you for considering this Appeal. We ask that this letter is placed in the administrative record for the Project.

Sincerely,

Danielle Wilson
Research Analyst
UNITE HERE Local 11

Exhibit A

UNITE **HERE!** Local 11

464 Lucas Ave., Suite 201 • Los Angeles, California 90017 • (213) 481-8530 • FAX (213) 481-0352

November 15, 2018

VIA EMAIL:

Planning Commission
City of Long Beach
333 West Ocean Blvd., 4th Floor
Long Beach, CA 90802
christopher.koontz@longbeach.gov
(cc: maryanne.cronin@longbeach.gov)

Re: Item No. 18-082PL, Planning Commission Hearing 11/15/18; Breakers Hotel Project (210 E. Ocean Blvd.); Categorical Exemption Case No. CE-18-152; Site Plan Review Case No. SPR18-033; Local Coastal Development Permit LCDP18-022

Dear Chair Lewis and Honorable Planning Commissioners:

On behalf of UNITE HERE Local 11, Jeremy Arnold, and José Nuñez Díaz (“Commenters”), we respectfully provide the City of Long Beach (“City”) the following comments regarding the categorical exemptions (“CE”) in addition to the Site Plan Review, Conditional Use Permit, and Local Coastal Development Permit (“Entitlements”) requested by Patrick Enrich and Nathan Morries of Arco Construction for the renovation of The Breakers Hotel (“Project”). Commenters are concerned with the Project’s compliance with the California Environmental Quality Act, Pub. Res. Code § 21000 *et seq.*, (“CEQA”) and the Long Beach Municipal Code (“LBMC”).

The Applicant argues that the Project is categorically exempt from CEQA requirements, but as discussed below, the Project does not qualify for any of the four different classes of categorical exemption Applicant seeks (Class 1, Class 3, Class 31, and Class 32). The proposed Project would convert a currently out-of-use building into a 185-room hotel with rooftop pool, bar, restaurant and retail uses. Such a dramatic change in use could have a significant impact on traffic, air quality, noise, land use, and historical resources. For example, the Traffic Impact Study is far too narrow to have accurately studied the traffic impacts of the proposed Project, which is likely to generate significantly more vehicular traffic than its current use. Commenters are also concerned about the Project’s impacts on historical resources, as the proposed modifications could threaten the site’s eligibility for the California and National Registers of Historic Places. As a City Historic Landmark, the Breakers Hotel building is a valuable historic resource for the City of Long Beach. Additionally, because required findings for the requested land use entitlements cannot be made, the Planning Commission cannot grant them at this time.

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Because the Project is not exempt from CEQA, an Initial Study and Environmental Impact Report ("EIR") or Mitigated Negative Declaration ("MND") must be prepared. **The Planning Commission should reject the requested CE and land use entitlements, and direct the City to prepare an Initial Study and EIR or MND.**

1. Project Background

The Project site is located on the south side of Ocean Boulevard, between Collins Way to the east and Locust Avenue to the west, and Victory Park to the north. To the south across Marine Way, a five-story residential development is currently under construction at 207 Seaside Way. The site is currently improved with an existing 13-story building with a 14th floor rooftop area, and two additional lower levels located below street level at Ocean Boulevard. The building was most recently used as a 233-unit congregate care facility, which closed in 2015, in addition to a restaurant and bar that recently closed. The building was designated a City Historic Landmark in 1989. The Project proposes several interior and exterior modifications, such as an interior floor plan reconfiguration, an addition of an outdoor rooftop pool and deck area, an enclosed outdoor staircase, and service elevator. The Project also includes improvements to the adjacent Victory Park, including several additions to the hardscape in the park, additional landscaping, and new park amenities.

2. Standing of Commenters

Mr. Arnold is a Long Beach resident living approximately 0.8 miles from the Project site. Mr. Díaz lives approximately 1.1 miles from the Project site. Such geographic proximity alone is sufficient to establish standing under CEQA. *See Bozung v. LAFCO* (1975) 13 Cal.3d 263, 272 (plaintiff living 1,800 feet from annexed property has standing to challenge the annexation); *see also Citizens Ass'n for Sensible Dev. v. County of Inyo* (1985) 172 Cal.App.3d 151, 158 ("a property owner, taxpayer, or elector who establishes a geographical nexus with the site of the challenged project has standing."). Furthermore, absent adequate analysis and full mitigation of Project-related impacts, Commenters will be adversely affected by the Project's impacts on traffic. Hence, Commenters have a beneficial interest in the Project's compliance with CEQA. *See Braude v. City of Los Angeles* (1990) 226 Cal.App.3d 83, 87.

Local 11 represents more than 30,000 workers employed in hotels, restaurants, airports, sports arenas, and convention centers throughout Southern California and Arizona. Members of Local 11, including over 500 who work in Long Beach and many Long Beach residents, join together to fight for improved living standards and working conditions. As such, Local 11 is a stakeholder in this Project, and worker and labor organizations have a long history of engaging in the CEQA process to secure safe working conditions, reduce environmental impacts, and maximize community benefits. The courts have held that "unions have standing to litigate environmental claims." *Bakersfield Citizens v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1198.

Furthermore, this comment letter is made to exhaust remedies under Pub. Res Code § 21177 concerning the Project, and incorporates by this reference all written and oral comments

submitted on the Project by any commenting party or agency. It is well established that any party, as Commenters here, who participates in the administrative process can assert all factual and legal issues raised by anyone. *See Citizens for Open Government v. City of Lodi* (2006) 144 Cal.App.4th 865, 875.

3. Background on CEQA, the "fair argument" standard, and categorical exemptions

CEQA is "an integral part of any public agency's decision making process." Pub. Res. Code § 21006; *see also Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal.3d 553, 564. CEQA was enacted to require public agencies and decision-makers to document and consider the environmental implications of their actions before formal decisions are made. *See* Pub. Res. Code §§ 21000, 21001; *see also Laurel Heights Improvement Ass'n v. Regents of the University of California* (1988) 47 Cal.3d 376, 392.

Built into CEQA is a strong presumption in favor of requiring preparation of an EIR. This presumption is reflected in what is known as the "fair argument" standard, under which an agency must prepare an EIR whenever substantial evidence in the record supports a fair argument that a project may have a significant effect on the environment. *See Laurel Heights Improvement Ass'n v. Regents of the Univ. of Cal.* (1993) 6 Cal.4th 1112, 1123; *see also No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75.

The fair argument test is a "low threshold" test for requiring the preparation of an EIR and a preference for resolving doubts in favor of environmental review. *See No Oil*, 13 Cal.3d at 84; *see also Mejia v. City of Los Angeles* (2005) 130 Cal.App.4th 322, 332. An agency must prepare an EIR if there is any substantial evidence in the record supporting a fair argument that a project may have a significant effect on the environment, regardless of any other evidence in the record. *See Parker Shattuck Neighbors v. Berkeley City Council* (2013) 222 Cal.App.4th 768, 776; *Friends of "B" Street v. City of Hayward* (1980) 106 Cal.App.3d 988, 1002. The determination of whether a fair argument exists is a question of law. *See Sierra Club v. County of Sonoma* (1992) 6 Cal.App.4th 1307, 1319.

CEQA Guidelines § 15384(a) defines "substantial evidence" as "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, **even though other conclusions might also be reached . . .**" (emphasis added). Facts, reasonable assumptions predicated on facts, and expert opinions supported by facts can constitute substantial evidence. *See* Pub. Res. Code §§ 21080(e), 21082.2(c), and CEQA Guidelines §§ 15064(f)(5) & 15384.

CEQA contains categorical exemptions for projects that are unlikely to have environmental impacts. *See* Pub. Res. Code § 21084. These exemptions are to be construed narrowly and are not to be expanded beyond the scope of their plain language. *See Castaic Lake Water Agency v. City of Santa Clarita* (1995) 41 Cal. App.4th 1257; *see also Wildlife Alive v. Chickering* (1976) 18 Cal.3d 190, 205. They must also be construed in light of their statutory authorization, which limits such exemptions to classes of projects that have been determined not

to have significant effects on the environment – ensuring categorical exemptions are interpreted in a manner affording the greatest environmental protection. *See Azusa Land Reclamation Co. v. Main San Gabriel Basin Watermaster* (1997) 52 Cal.App.4th 1165, 1192; *see also Save Our Schools v. Barstow Unified Sch. Distr. Bd. of Educ.* (2015) 240 Cal.App.4th 128, 140; *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 966.

Exceptions to categorical exemptions also exist, requiring agencies to perform an Initial Study (“IS”) and further environmental review whenever a project is subject to one of the “exceptions-to-the-exemptions.” *See* CEQA Guidelines § 15300.2. Moreover, lead agencies may not avoid conducting an IS by merely adopting mitigation measures into a project. *See Salmon Protection & Watershed Network v. County of Marin* (2004) 125 Cal.App.4th 1098, 1102 (holding project must be reviewed under CEQA when mitigation was required to avoid triggering sensitive environment, significant impact, or cumulative impacts exceptions to the use of categorical exemptions); *see also Azusa Land Reclamation Co. v. Main San Gabriel Basin Watermaster* (1997) 52 Cal.App.4th 1165, 1200 (observing CEQA Guidelines do not authorize consideration of mitigation measures with the categorical exemption and that the project required at minimum an MND).

4. The Project does not qualify for any categorical exemption.

Here, Applicant seeks to exempt the Project from CEQA through four separate classes of categorical exemptions: Class 1, Class 3, Class 31, and Class 32. *See* CEQA Guidelines §§ 15300; 15301; 15303; 15331; 15332. Because the Project does not qualify for any class of categorical exemption, the Planning Commission must reject Applicant’s request that the Project be found categorically exempt from CEQA.

a. The Project does not qualify for a Class 1 categorical exemption.

Class 1 consists of “the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures . . . involving negligible or no expansion of use beyond that existing at the time of the lead agency’s determination.” CEQA Guidelines § 15301 (emphasis added). Class 1 categorical exemptions are clearly meant to apply to projects involving no change in use. To the best of Commenters’ knowledge, the subject property is completely out of use at this time. The Project would convert it into a 185-room hotel with rooftop entertainment facilities, onsite bar, restaurant, and retail—a radical change from the building’s current non-use. This Project plainly does not qualify for a Class 1 categorical exemption.

Even if this Project involved negligible or no expansion of use, it would not qualify for a Class 1 categorical exemption because the alterations to the structure are not “minor.” The Project proposes the addition of an enclosed staircase and service elevator which will extend the tower eastward approximately 10 feet. It also includes a widening of the driveway on Ocean Avenue by 1,398 square feet and an increase in the adjacent Victory Park hardscape by 249

square feet.¹ Because these expansions go beyond minor alterations of the existing structure, the Project does not qualify for a Class 1 categorical exemption.

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In sum, the Project does not qualify for a Class 1 categorical exemption because it involves a drastic change in use and because it proposes major alterations to the existing structure.

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b. The Project does not qualify for a Class 3 categorical exemption.

The Class 3 categorical exemption consists of, *inter alia*, the construction of “new, small facilities or structures” and the “conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure.” CEQA Guidelines § 15303. Here, the Project does not involve the construction of new, small facilities or structures. The Project is also not a “conversion of existing small structures from one use to another,” because the structure is very large. CEQA Guidelines § 15303(c) limits the construction of new structures in urbanized areas to 10,000 square feet in total floor area. The subject property is approximately 172,000 square feet in area, far beyond what may qualify under Class 3.

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The Project also does not qualify for a Class 3 categorical exemption because it would involve significant modifications to the exterior of the structure. As stated above, the alterations to the exterior of the building are not “minor.” They include the addition of an enclosed staircase and service elevator, which will extend the tower eastward approximately 10 feet, an expansion of the driveway on Ocean Avenue by 1,398 square feet, and the addition of a swimming pool poll deck, and a terrace.

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In Sum, the Project does not qualify for a Class 3 categorical exemption because it does not involve the construction of new, small facilities or structures and because it involves significant modifications to the exterior of the structure.

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c. The Project does not qualify for a Class 31 categorical exemption.

The Class 31 categorical exemption applies to “projects limited to maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation, or reconstruction of historical resources . . .” CEQA Guidelines § 15331. Because the Project involves a radical change and intensification in use, from an out-of-use congregate care facility to a brand new hotel, the Planning Commission cannot find that it is “limited” to the restoration of the structure as an historical resource. Because the conversion of an historical landmark into a hotel is plainly not a mere restoration of that landmark, the Project does not qualify for a Class 31 categorical exemption.

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d. The Project does not qualify for a Class 32 categorical exemption.

¹ Taken from renderings of the Project obtained from the Project Planner.

Class 32 categorical exemptions are limited to in-fill development projects that, *inter alia*, are “consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations” and “would not result in any significant effects relating to traffic, noise, air quality or water quality.” CEQA Guidelines § 15332(a), (d). As explained below, the Project does not qualify for a Class 32 categorical exemption because it is (1) inconsistent with the applicable general plan and (2) because it cannot be readily perceived that the Project will not result in any significant effects relating to traffic, noise, air quality or water quality.

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1. The Project is inconsistent with applicable land use plans and zoning.

In order to qualify for a Class 32 categorical exemption, the Project must be “consistent with applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.” CEQA Guidelines § 15332(a). The Project is located within Subarea 7 of the Downtown Shoreline Planned Development District (PD-6), and within General Plan Land Use District Number 7 (LUD 7). The Project as it is currently proposed is inconsistent with more than one element of the applicable general plan policies. General Use and Development Standard (j) for PD-6 states: “It shall be the goal of the City to develop a program/policy for the Downtown Shoreline area that protects and encourages lower cost visitor accommodations.”² As it appears that no such program/policy exists, individual developments should advance the goal of providing lower cost visitor accommodations. The Project proposes a rooftop pool, terrace, food/beverage, and banquet/meeting spaces, a spa, and a fitness center, amenities typical of luxury hotels. As currently proposed, the Project conflicts with Development Standard (j) in that it proposes luxury amenities, strongly suggesting that it will provide expensive rather than affordable overnight visitor accommodations.

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The Project also does not provide nearly enough public benefits. The introduction to PD-6 specifically highlights that there is a “high degree of public interest in this area . . . due to the potential public benefits that can be derived from its uses,” indicating that public benefits are critical to the fulfillment of the Downtown Shoreline Community Plan.³ The Project proposes a hotel with bar, retail, and food service venues. All of these uses would be contained within a private development. A project of this magnitude would better serve the community as housing and with ancillary uses that genuinely serve the public, such as, for example, meeting spaces that could be reserved out free of charge or public art gallery space.

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The Project does not qualify for a Class 32 categorical exemption because it conflicts with applicable general plan policies in that it does not propose affordable accommodations nor is it proposed to provide enough public benefits.

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2. The Project may have significant traffic impacts.

² Ordinance No. ORD-11-0017, Downtown Shoreline Planned Development District (PD-6), p. 14, available at: <http://www.lbds.info/civica/filebank/blobload.asp?BlobID=2463>

³ *Id.*, p. 2.

In order to qualify for a Class 32 categorical exemption, a project must not result in any significant effects relating to traffic. CEQA Guidelines § 15332(d). The Traffic Impact Study ("TIS") prepared for the Project fails to provide an adequate analysis of traffic impacts. For the reasons discussed below, the TIS fails to provide an accurate and conservative traffic analysis. In order to receive a Class 32 categorical exemption, a revised traffic study must be prepared.

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a. The Traffic Impact Study area is unacceptably narrow.

The TIS studies only ten intersections (TIS, p. 2). This deviates from the City's practice of requiring the study of many more intersections for similar or nearby projects, including: 31 intersections for the 2nd/PCH project,⁴ 30 intersections for the Shoreline Gateway East Tower addendum⁵ and Golden Shore Master Plan project⁶ and 14 intersections analyzed for the Oceanaire Apartment project.⁷ This narrow study area fails to account for the Project's cumulative impact on intersections already operating and/or anticipated to operate at an unacceptable LOS when considering other related projects, as discussed below.

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b. The Traffic Impact Study fails to study intersections already or anticipated to be operating on unacceptable levels.

As confirmed by other nearby project traffic studies,⁸ intersections nearby the Project Site are already operating at or near a LOS of E or F and/or anticipated to be operating at such levels (anticipated levels in 2017-2020). As summarized in the table below, previous traffic counts conducted between 2008-2016 show various V/C levels, the majority of which either operating at or below an acceptable LOS of D (see figures in red). Moreover, those same traffic studies anticipated V/C levels in 2017-2020 to be operating well below a LOS of D (also in red). Given these intersections are already and/or anticipated to be suffering deteriorating LOS, it is reasonable that a slight increase in V/C generated by the project could trigger an applicable threshold, which warrants mitigation. Therefore, these intersections must be analyzed in a revised traffic study.

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⁴ 2nd/PCH mixed retail project (Apr. 2017) Draft EIR, pp. IV.K-8-9,
<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=6498>.

⁵ Shoreline Gateway E. Tower (10/3/16) Addendum Traffic Study, PDF p. 10,
<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=6153>.

⁶ Golden Shore Master Plan project (10/2/09) DEIR Traffic Study, PDF pp. 9,
<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=3199>;

⁷ Oceanaire project (Mar. 2015) IS/MND, pp. 101-103,
<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4978>.

⁸ Oceanaire project (2/24/15) Traffic Study, PDF pp. 29-30 (Tbls. 7 and 8),
<http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4977>; 207 Seaside Way project (2/19/15) Traffic Study, PDF p. 49-50 (Tbls. 8-1 & 8-2), <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4954>; Shoreline Gateway E. Tower project (10/3/16) Addendum Traffic Study, PDF pp. 39-41 (Tbl. 3-4), pp. 69-74 [Tbl. 8-2], <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=6153>; Golden Shore (10/2/09) Addendum Traffic Study, PDF pp. 30-31 (Tbl. 3-4), PDF pp. 56-59 (Tbl. 8-1), <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=3199>; Land Use Element/Urban Design Element (May 2016) Draft EIR Traffic Study, PDF pp. 11-12 (Tbl. A), <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=6079>;

Intersections Operating At/Near Unacceptable Levels

Intersection		Recorded LOS (2008 -2016)		Anticipated (2017-2020)	
		V/C	LOS	V/C	LOS
Alamitos/ Ocean	am	0.746 - 1.120	C - F	0.820 - 1.267	D - F
	pm	0.854 - 1.062	D - F	0.966 - 1.199	E-F
Alamitos / 3rd	am	0.853 - 1.048	D - F	1.006 - 1.014	F
	pm	0.577 - 0.659	A-B	0.77	C
Alamitos / 7th	am	0.825 - 0.902	D - E	0.993 - 1.004	E - F
	pm	0.735 - 0.763	C	0.881 - 1.253	D - F
Alamitos / Broadway	am	0.713 - 0.900	C - E	0.859 - 0.910	D - E
	pm	0.747 - 0.945	C - E	0.832 - 0.991	D - E
Long Beach / 7th	am	0.658 - 0.730	B - C	0.818 - 0.952	D - E
	pm	0.484 - 0.550	A	0.633 - 0.795	B - C
Magnolia / Ocean	am	0.748 - 0.848	C - D	0.945 - 1.001	E - F
	pm	0.661 - 0.744	A - B	0.845 - 0.880	D
Alamitos / 4th	am	0.707	C	0.821	D
	pm	0.888	D	1.021	F

c. The Traffic Impact Study uses an improper baseline of existing conditions.

The TIS conducted only a single a.m./p.m. traffic count on June 7, 2018 (TIS, p. 21). However, the traffic volumes recorded seem to be significant lower than traffic counts previously conducted by other projects. The table below compares the traffic levels of five intersections studied in the TIS to five different traffic studies from City projects. For example, the Pine/Seaside intersection was analyzed in the TIS, which recorded a volume-to-capacity ratio ("V/C") of 0.202 during a.m.-peak and 0.255 during p.m.-peak (TIS, Table 4, p. 26). However, under the 207 Seaside Project traffic study, that intersection was recorded as having a V/C level of 0.400 during the a.m.-peak and 0.477 during the p.m.-peak—roughly 98 and 87 percent higher, respectively, than purported in the TIS.

As shown in the table below, the TIS appears to have recorded significantly lower baseline traffic counts in at least these five intersections. Differences in red indicate V/C levels that were higher in other traffic studies than in the TIS. This suggests that the traffic count conducted for the TIS is a potential outlier, which warrants utilizing the highest value of known traffic counts conducted in the area, as the City has done in other projects.⁹ Moreover, additional

⁹ See e.g., Oceanair project (2/24/15) Traffic Study, PDF p. 11, <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4977>; 207 Seaside Way project (2/19/15) Traffic Study, PDF p. 16, <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4954>.

traffic counts should be performed.

Comparison of Existing Traffic Levels between TIS and Other City Projects

Intersection	Project ¹⁰		Oceanair Project ¹¹			207 Seaside Project ¹²			Shoreline Project ¹³		
	Int.	V/C	Int.	V/C	Diff.	Int.	V/C	Diff.	Int.	V/C	Diff.
Pacific/ am	2	0.580	3	0.553	-4.7%	2	0.547	-5.7%	23	0.649	11.9%
Ocean pm		0.521		0.503	-3.5%		0.5	-4.0%		0.504	-3.3%
Pine/ am	4	0.494	4	0.532	7.7%	3	0.532	7.7%	24	0.623	26.1%
Ocean pm		0.623		0.674	8.2%		0.674	8.2%		0.778	24.9%
Long Beach/ am	9	0.571	6	0.517	-9.5%	7	0.517	-9.5%	25	0.639	11.9%
Ocean pm		0.518		0.483	-6.8%		0.483	-6.8%		0.538	3.9%
Pine/ am	6	0.323	10	0.342	5.9%	5	0.352	9.0%	30	0.373	15.5%
Shoreline pm		0.450		0.477	6.0%		0.51	13.3%		0.492	9.3%
Pine/ am	5	0.202	9	0.287	42.1%	4	0.4	98.0%	n/a		
Seaside pm		0.255		0.286	12.2%		0.477	87.1%			

Intersection	Project		Golden Shore Project ¹⁴			Land Use Element ¹⁵		
	Int.	V/C	Int.	V/C	Diff.	Int.	V/C	Diff.
Pacific/ am	1	0.580	19	0.689	18.8%	6	0.814	40.3%
Ocean pm		0.521		0.632	21.3%		0.713	36.9%
Pine/ am	2	0.494	20	0.634	28.3%	n/a		
Ocean pm		0.623		0.774	24.2%			
Long Beach/ am	3	0.571	21	0.718	25.7%	11	0.723	26.6%
Ocean pm		0.518		0.584	12.7%		0.632	22.0%
Pine/ am	4	0.323	30	0.355	9.9%	n/a		
Shoreline pm		0.450		0.486	8.0%			
Pine/ am	5	0.202	26	0.263	30.2%	n/a		
Seaside pm		0.255		0.308	20.8%			

¹⁰ Traffic Impact Study for Breakers Hotel, Table 4, p. 26.

¹¹ Oceanair project (Mar. 2015) IS/MND, p. 108, <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4978>.

¹² 207 Seaside project (Mar. 2015) IS/MND, p. 105, <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4949>.

¹³ Shoreline Gateway E. Tower (10/3/16) Addendum Traffic Study, PDF p. 68, <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=6153>.

¹⁴ Golden Shore Master Plan project (10/2/09) Addendum Traffic Study, PDF pp. 28-31, <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=3199>.

¹⁵ Land Use Element/Urban Design Element (May 2016) Draft EIR Traffic Study, PDF pp. 11-14, 32 (fig. 1) <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=6079>

d. The Traffic Impact Study fails to include all related projects.

The TIS identifies 37 related projects (TIS, Table 7, pp. 32-33), but fails to identify numerous related projects that should have been incorporated into the analysis. These include:

- Silversands apartment/hotel project: including 33 dwelling units and 72 hotel room mixed-use development at 2010 E. Ocean Blvd. estimated to generate 807 average daily trips ("ADTs").¹⁶
- City Hall East Edison apartment project: including 126 apartment units and 3,621 SF of retail at 100 Long Beach Blvd. estimated to generate 1,192 ADTs.¹⁷
- Pike Outlet retail project: 392,992-SF conversion of a new retail outlet south of Seaside Way (between Cedar Ave. and Pine Ave.) estimated to generate 2,266 ADTs.¹⁸
- Commercial Reuse project: 3,657 SF restaurant with a bar at 743 E. 4th St. estimated to generate 418 ADTs.
- Queensway Drive hotel project: 178-room hotel development at 600 Queensway Dr. estimated to generate 1,588 ADTs.
- 25 S. Chestnut Place condo project: 246 condo-unit development at 25 S. Chestnut Pl. estimated to generate 1,028 ADTs.
- Hotel Sierra (red thumbtack H): 191-room hotel development at 290 Bay Street estimated to generate 1,115 ADTs.¹⁹
- Bay Street hotel project: 138-room hotel development at 285 Bay St. estimated to generate 1,231 ADTs.
- 421 W. Broadway apartment project: 291 apartment units and 15,580 SF of commercial development at 421 W. Broadway estimated to generate 2,604 ADTs.
- George Deukmejian Courthouse: 531,000-SF municipal building containing commercial/retail space at 275 Magnolia Avenue completed in 2013 and estimated to generate 1,920 ADTs.²⁰
- Pine Avenue project: 18 dwelling units and 15,000 SF of commercial development at 433 Pine Avenue estimated to generate 764 ADTs.
- Long Beach Boulevard mixed-use project: 82 dwelling units and 7,000 SF of commercial development at 350 Long Beach Blvd. estimated to generate 1,086 ADTs.
- Ocean Boulevard dwelling/hotel project: 51 dwelling units and 47 hotel room development at 1628-1724 E. Ocean Blvd. estimated to generate 715 ADTs.

¹⁶ Long Beach Post (9/11/18) After tumultuous battle, hotel and condominium project on Long Beach shoreline moves forward, <https://lbpost.com/commentary/renderings-hotel-condominium-long-beach-shoreline-labor/>.

¹⁷ Curbed LA (8/19/16) Long Beach's City Hall East becomes luxury apartments, renting from \$1,880, <https://la.curbed.com/2016/8/19/12527650/long-beach-city-hall-east-edison-apartments>.

¹⁸ City (5/4/16) CPC report RE: Planning Commission 2015 in Review, p. 16, <http://www.longbeach.gov/globalassets/city-manager/media-library/documents/memos-to-the-mayor-tabbed-file-list-folders/2016/may-4--2016---planning-commission-2015-in-review>.

¹⁹ Hotel Sierra (May 2009) Addendum to Supplemental EIR 14-04, <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=2968>.

²⁰ California Courts (2018) Courthouse Projects, <http://www.courts.ca.gov/facilities-la-longbeach.htm>;;

- West Gateway project: 40-story tower including 694 residential units at 600 W. Broadway.²¹
- Rockefeller Partners project: eight-story mixed-use development with 120 residential units and 6,000 square feet of retail space at 1101 Long Beach Blvd.²²
- Security Pacific National Bank project: adaptive reuse project into a 13-story hotel with 189 guestrooms at 110 Pine Ave.²³

These other related projects not included in the TIS will generate at least an estimated 21,158 average daily trips ("ADTs") that, when combined with the Project's estimated 1,631 ADTs (Traffic Study pp. 12-13, Table 2), may result in a cumulative significant traffic impact at nearby intersections. A revised traffic study must include all related projects to ensure a conservative cumulative traffic impact analysis.

e. The TIS uses overly high internal trip credit assumptions.

The TIS applied various trip credits in its estimate of the Project's trip generation, including a 25 percent internal trip credit for the restaurant and bar and a 50 percent internal trip credit for the spa (TIS, p. 11). These assumptions appear to be much higher than the trip credits applied to similar hotel/mixed-use projects near the LA Convention Center located in the City of Los Angeles, which apply a maximum internal trip credit of 20 percent, maximum pass-by trip credit of 20 percent, and no presumption of ridesharing services.²⁴ The TIS should be revised using more conservative and appropriate trip credits.

f. The TIS fails to analyze traffic impacts during the Project's construction phase.

The TIS analyzes only the estimated traffic impacts of the operational phase of the Project. It completely ignores potential traffic impacts during the construction phase, when substantial renovation to the exterior of the building and rooftops will be conducted. The failure to analyze construction phase traffic impacts prevents the City and the public from achieving a full understanding of the traffic impacts of the Project. The TIS must be revised to analyze these impacts.

²¹ <https://la.curbed.com/maps/long-beach-development-downtown-project-map>; CurbedLA (8/29/18) 40-story skyscraper would be Long Beach's tallest, <https://la.curbed.com/2018/8/29/17797158/long-beach-development-tallest-tower-40-stories>.

²² CurbedLA (Listed as project number 23), <https://la.curbed.com/maps/long-beach-development-downtown-project-map>;

²³ *Id.*, (Listed as project number 27).

²⁴ See e.g., Fig+Pico Conference Center Hotels (Sep. 2017) Draft EIR, pp. 4.10-26-4.10-33, <https://planning.lacity.org/eir/FigPico/files/4.10%20Transportation%20and%20Traffic.pdf>; 1020 S. Figueroa Street Project (Sep. 2016) Draft EIR, pp. 4.J-28, 4.J-36- 4.J-39, http://planning.lacity.org/eir/1020SoFigueroa/DEIR/4_J_Transportation_and_Traffic.pdf.

In sum, the Project does not qualify for a Class 32 categorical exemption because it may result in significant traffic impacts. The TIS inadequately studied the Project's traffic impacts and a revised and substantially more thorough study must be prepared.

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3. The Project may have significant noise impacts.

The Statement of Support for Class 32 categorical exemption states that the "hotel and ancillary uses will not introduce a substantial new noise source relative to existing conditions and the project will operate within the standards of the adopted Noise Ordinance."²⁵ This claim is completely unsubstantiated, as no noise analysis was prepared for this Project. The Project will undoubtedly introduce substantial new noise sources, as the building would be converted from an out-of-use congregate care facility into a 185-room hotel with a rooftop pool and bar and an indoor minibar, restaurant, and retail uses. The City's own Noise Element Existing Conditions Report specifically lists "restaurants" and "bars" as uses that "have the potential to generate noise which may be perceived as annoying or disturbing."²⁶ Therefore, the Project does not qualify for a Class 32 categorical exemption because it may have significant impacts on noise.

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4. The Project may have significant impacts on air quality.

In order to qualify for a Class 32 categorical exemption, approval of a project must not result in any impacts on air quality. CEQA Guidelines § 15332(d). The Applicant does not address whether or not the Project will have significant impacts on air quality. Given that the Project would convert a currently out-of-use building into a hotel, it will at the very least generate far more mobile source emissions. The building is currently out-of-use, generating no traffic, neither operational nor construction-related. The proposed additions to the building will generate construction-related traffic, and the proposed hotel, restaurant, bars, and retail will be open to the public. Many of these patrons are likely to travel by car. The Planning Commission cannot confirm that the Project will not have significant impacts on air quality if no study at all has been prepared for such a radical intensification of use. Because the Project may have significant impacts on air quality, it does not qualify for a Class 32 categorical exemption.

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5. The Project may have significant impacts on water quality.

In order to qualify for a Class 32 categorical exemption, the Project must not result in any significant impacts on water quality. The Statement of Support states that "there are three sites located approximately 350 feet east of the project site that are listed under a tiered permit or military evaluation." Given the proximity of these sites to the Project site, there could be potential significant impacts on water quality and other aspects of the environment. "The determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on

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²⁵ California Environmental Quality Act Statement of Support, Class 32 (Infill Development) Exemption Determination, Section D

²⁶ General Plan Noise Element Update, "Existing Conditions Report," p. 1-15.

scientific and factual data.” CEQA Guidelines § 15064(b). The Statement of Support mentions these three sites in passing, yet does not offer any further detail about the nature or risks of these sites to water quality and human health in general. Without further study or explanation, the public cannot know whether or not mitigation measures are required. The Project does not qualify for a Class 32 categorical exemption because it may have significant impacts on water quality.

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For all of the reasons stated above, the Project does not qualify for a Class 32 categorical exemption.

5. The Project does not qualify for a categorical exemption because exceptions-to-the-exemptions apply.

A project falling within a categorical exemption may nevertheless require environmental review if the project is subject to one of the exceptions-to-the-exemptions. CEQA Guidelines § 15300.2. As explained below, multiple exceptions apply to this Project because of significant cumulative impacts and potentially adverse impacts on historical resources.

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a. There are significant cumulative impacts caused by other projects of the same type in the area.

Categorical exemptions “are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.” CEQA Guidelines § 15300.2(b). There are at least four projects of the same type in various stages of planning within two miles of the Project site, including the following:

- Jergins Tunnel Hotel Project, 100 E. Ocean Blvd.
- 110 Pine St. Hotel
- Queen Mary Hotel, 1126 Queens Hwy.
- Long Beach Civic Center Hotel, West Gateway²⁷

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The concentration of projects in this area are precisely the kind of “successive projects of the same type in the same place” which may result in cumulative impacts.

In addition, at a presentation this past August, Mayor Robert Garcia announced plans for a development boom within the downtown core. He listed over 30 residential and commercial projects that are currently in planning or underway. There are at least four other major projects in the various stages of planning within less than half a mile from the Project site alone:

Sonata Modern Flats, 207 E. Seaside Way
Oceanaire, 150 W Ocean Blvd.
Ocean View Tower, 200 W. Ocean Blvd.

²⁷ <https://la.curbed.com/maps/long-beach-development-downtown-project-map>

Blue Line renovations, 107 E. First St.²⁸

Because of the significant cumulative impacts on the environment due to this Project, other hotels, and other major projects in the area, the Project is excepted from any categorical exemption from CEQA.

b. The Project may cause a substantial adverse change in the significance of a historical resource.

"A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource." CEQA Guidelines § 15300.2(f). In this case, arguably the most significant element of the Project is that the historic Breakers structure would not only be converted from an out-of-use congregate care facility into a hotel with a rooftop pool and food, beverage, and retail outlets, but it would include several major physical alterations to the existing building. The Project is currently designated a local historical landmark, making it presumed historically or culturally significant under CEQA. CEQA Guidelines § 21084.1. Modifications to the existing building could threaten the building's eligibility for designation as a local landmark or for inclusion in the California Register of Historical Resources. Because the Project may cause a substantial adverse change in the historical significance of the Breakers structure, it does not qualify for a categorical exemption.

In sum, even if the Project did qualify for a categorical exemption, it would be excepted from an exemption due to significant cumulative impacts and potential adverse impacts on the significance of a historical resource.

6. The required findings for the requested entitlements cannot be made

A site plan review shall not be approved unless six findings of fact are made. The first finding states:

The design is harmonious, consistent and complete within itself and is compatible in design, character and scale, with neighboring structures and the community in which it is located. LBMC § 21.25.506(A)(1).

The Project may negatively impact the abutting Victory Park, requiring further consideration of the interaction between the two sites. Vehicular access to the Breakers Hotel will pass through the public park by way of a circular driveway, introducing potential for vehicular-pedestrian accidents. This may also interrupt recreation in the park due to consistent vehicular entrances to the Project for all of its uses, including overnight stay and restaurant and alcohol patronage. Proposed changes to the park include widening and reconfiguring the existing driveway, further limiting the acreage of open space. Because the potential for disruptive interactions between the Project and abutting park conflict with the requirement of the finding that the project design is

²⁸ *Id.*

“harmonious” and compatible “with neighboring structures and the community in which it is located,” this finding cannot be made.

In addition, the another required finding of fact states: “The design will not remove significant mature trees or street trees, unless no alternative design is possible.” LBMC § 21.25.506(A)(3). The existing palm trees are proposed to be relocated from their current positions and incorporated into the final landscape. However, the unnecessary removal of these trees could potentially harm them in the interim, and no evidence suggests that there is not a possible alternative design.

Because two of the required findings of fact cannot be made, the Planning Commission cannot approve the Site Plan Review at this time.

a. The required findings for the Conditional Use Permit “CUP” cannot be made.

In order to grant a Conditional Use Permit, the Planning Commission must find, *inter alia*, that “[t]he approval is consistent with and carries out the General Plan, any applicable specific plans such as the local coastal program and all zoning regulations of the applicable district.” LBMC § 21.25.206(A). This finding cannot be made because the Project conflicts with elements of PD-6. As mentioned earlier, PD-6 General Use and Development Standard (j) encourages a “program/policy . . . that protects and encourages lower cost visitor accommodations.” There is no mention of this general goal for the Downtown Shoreline area in the project proposal. Additionally, for any local visitors to the Project, the only option for parking off-site valet parking, which may deter middle or low-income guests, further separating the proposed Breakers Hotel from the Downtown Shoreline Area Plan goals to provide affordable visitor options.

In addition, there are numerous requirements and plan amendments listed as conditions of approval that would substantially alter the Project and that should be completed before granting the CUP. The conditions of approval for the CUP note that, prior to the issuance of building permits, City staff must review and approve the following: a hotel operations plan that includes all vehicular operations, valet operations, delivery locations, and rideshare drop off and pick-up, a revised traffic impact analysis, a grading plan with hydrology and hydraulic calculations, off-site parking lease, improvement and improvement plans, and ADA compliance.²⁹ The requirements listed for the hotel operations plan alone, especially given the many issues related to parking and on-site vehicular traffic, are substantial, and should be reviewed prior to approval of the CUP, not only as a condition for the issuance of building permits. Since there are still extensive plans that are yet to be completed and reviewed by City experts, and these numerous plan updates and approvals will affect the general welfare of the community as well as potential safety hazards, a CUP should not be granted at this time.

²⁹ See: Special Conditions of Approval 5, 8, 10, 11, 14, 19, 23, 30, 32, 34, 40, 44, 47, 58, 62, 63, 64 75, 77, 78, 80, 81, 85, 86, 89.

The staff report states that, under the LBMC, special conditions apply to alcohol beverage sales uses requiring a conditional use permit. LBMC § 21.52.210(D) requires that the use:

shall not be in a reporting district with more than the recommended maximum concentration of the applicable on or off-premises sales use, as recommended by the State of California Alcoholic Beverage Control Board, nor with a high crime rate as reported by the Long Beach Police Department.

The staff report admits that the Project site census tract is oversaturated with on-sale alcohol licenses as reported by Alcohol Beverage Control (ABC), with 78 licenses issued licenses, 73 more than the ABC recommended maximum of 5.³⁰ While there are current alcohol licenses at the location site being extended to the Project, the new extensions allow for an increase in number of on-site venues where alcoholic beverages may be consumed, potentially increasing the alcohol consumption overall.

In sum, because the Project conflicts with applicable land use plans, and the Project is located in a reporting district with more than the ABC recommended maximum concentration of on-sale alcohol licenses, the required findings cannot be made, and the Planning Commission cannot grant the CUP at this time.

b. The required findings for the requested Local Coastal Development Permit cannot be made.

The Project requires a Local Coastal Development Permit ("LCDP") because it is located within the Coastal Zone. LBMC § 21.25.903. In order to issue an LCDP, the Planning Commission must make two required findings pursuant to LBMC § 21.25.9049(C):

1. The proposed development conforms to the certified local coastal program including but not limited to all requirements for replacement of low and moderate-income housing; and
2. The proposed development conforms to the public access and recreation policies of Chapter 3 of the Coastal Act. This second finding applies only to development located seaward of the nearest public highway to the shoreline.

Neither finding can be made because the proposed Project is inconsistent with the Local Coastal Program ("LCP") and does not conform to the public access and recreation policies of Chapter 3 of the Coastal Act.

³⁰ Conditional Use Permit Findings, Section C(d)

The first required finding cannot be made because the Project is inconsistent with the LCP. First, the proposed Project does not strengthen the entry to Promenade South on Ocean Boulevard at the southeast corner of Pine Avenue as required by the provisions of Area 14, Breakers, of the Downtown Shoreline Policy Plan. In reference to this requirement, the LCDP findings suggest that "visitor-serving uses" can serve as a substitute: "While the project site does not abut that specific entry to the Promenade South, the change of use to a hotel . . . would constitute visitor-serving uses."³¹ "Visitor-serving uses" cannot substitute for a requirement to strengthen an entry. The Applicant should be required to accomplish this goal concretely by, for example, widening the pathway to or explicitly directing pedestrians towards the Promenade.

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In addition, the proposed Project does not comply with Building Design provision (4)G(a) of Downtown Shoreline Planned Development District (PD-6), Subarea 7, which requires a project that includes a change of use of an existing building to "provide for the eastward continuation of the east/west pedestrian walkway across the subject sites." Because the Project includes a significant change in use, this requirement applies. Project documentation does not demonstrate that this pedestrian walkway will not be obstructed by the Project.

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The second required finding cannot be made because the Project does not encourage lower cost recreational and visitor facilities. Chapter 3 of the Coastal Act requires: "Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred." Pub. Res. Code § 30213. As stated above, the Project does not propose lower cost facilities. In fact, the developer boasts "best-in-class amenities, entertainment, and dining," in a recent press release regarding renovation plans for the existing building, suggesting that the proposed project will not be accessible to lower-income guests.³² One of the main goals of the Coastal Act is to "[m]aximize public access to and along the coast." Pub. Res. Code § 30001.5(c). In order to fully comply with the Coastal Act, the Project should maximize public uses within the building and ensure that they are accessible to lower-income patrons.

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Finally, underlying the above concerns is that the current LCP was certified in 1980 and was most recently amended in 1994. The existing conditions of the area outlined in the LCP are nearly four decades old. Since then, the entire city of Long Beach has changed dramatically, both demographically and in terms of the built environment. With the current development boom in downtown, the potential increase in traffic alone is enough of a change to delay further changes in the area. The City should not consider further dramatic changes within the legally-protected Coastal Zone until the LCP is updated and fully certified by the California Coastal Commission.

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In sum, the required findings of fact for the LCDP cannot be made due to inconsistencies with applicable land use plans and Chapter 3 of the Coastal Act, and it cannot be approved at this time.

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³¹ Local Coastal Development Permit Findings, Section A

³² <http://www.prweb.com/releases/2018/01/prweb15074263.htm>

7. Conclusion

To summarize, Commenters are concerned with various issues related to CEQA, including potential significant impacts on historical resources and traffic, in addition to compliance with the LBMC. The Planning Commission should deny the requested CE and land use entitlements, and the City should prepare an Initial Study and an EIR, or, at the very least, an MND.

Commenters reserve the right to supplement these comments at future hearings and proceedings for the projects. *See Cmtys. For a Better Env't*, 184 Cal.App.4th at 86; *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1120.

Finally, on behalf of Commenters, Commenters request, to the extent not already on the notice list, all notices of CEQA actions and any approvals, Project CEQA determinations, or public hearings to be held on the Project under state or local law requiring local agencies to mail such notices to any person who has filed a written request for them. *See* Pub. Res. Cod § 21080.4, 21083.9, 21092, 21092.2, 21108, 21167(f) and Gov. Code § 65092. Please send notice by electronic and regular mail to: Danielle Wilson 464 Lucas Ave. #201, Los Angeles, CA 90017, danielle.wilson@unitehere11.org (cc: cdu@unitehere11.org).

Thank you for consideration of these comments. We ask that this letter is placed in the administrative record for the Project.

Sincerely,

Danielle Wilson
Research Analyst
UNITE HERE Local 11

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Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

Breakers Hotel (1806-19)
South Coast AQMD Air District, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Hotel	185.00	Room	0.49	186,032.00	0
City Park	0.61	Acre	0.61	26,571.60	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	31
Climate Zone	9			Operational Year	2021
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	CH4 Intensity (lb/MWhr)	0.029	N2O Intensity (lb/MWhr)	0.006

1.3 User Entered Comments & Non-Default Data

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

Project Characteristics - Construction timeline from Applicant (March 2019 - March 2021)

Land Use - Adaptive reuse of (E) Breakers Hotel Building (approx 172,000 sf) to a 185-room hotel (back to original building use). New building area added for stairwell and elevator. Total final gross floor area = 186,032 sf (on 0.49 ac lot). The (E) Victory Park is on a separate lot (0.61 ac). Modifications in Victory Park include new landscaping, a reconfigured driveway, and new passive park amenities.

Construction Phase - The project is an adaptive reuse and no building demolition required. Grading and site preparation limited to Victory Park. Victory Park grading and site preparation to start and stop over 20 days (Applicant). Building construction for stairwell addition to occur July 2019 to July 2020 (Applicant). Paving to occur over 75 days (start and stop) (Applicant). Painting and architectural coating to be done in stages during renovation/restoration beginning July 2019 to May 2020.

Off-road Equipment - No Building Demolition required for adaptive reuse.

Off-road Equipment -

Off-road Equipment - 2 excavators operating for 6 hours per day for 4 days (Applicant).

Off-road Equipment - Applicant: 5 lifts operating 8 hours per day for one week. 1 crane operating for 8 hours for 10 days.

Off-road Equipment - 1 pump per day operating for 4 hours per day for 10 days (applicant).

Off-road Equipment -

Grading - Victory Park - Site preparation and grading limited to Victory Park (0.61 ac). Soil export estimated at 500 cy (applicant).

Demolition - Approximately 1,000 tons of debris to be removed.

Vehicle Trips - Total trip generation for the hotel is 1,631 trips per day or 8.82 trips per room. Park trips are default trips.

Energy Use -

Mobile Land Use Mitigation -

Mobile Commute Mitigation - TDM Plan to be implemented for employees and hotel/venue patrons. No mitigation incorporated in analysis for conservative estimate.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10.00	220.00
tblConstructionPhase	NumDays	200.00	263.00
tblConstructionPhase	NumDays	20.00	0.00
tblConstructionPhase	NumDays	4.00	20.00
tblConstructionPhase	NumDays	10.00	75.00
tblConstructionPhase	NumDays	2.00	20.00
tblConstructionPhase	PhaseEndDate	2/7/2020	5/1/2020

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

tblConstructionPhase	PhaseEndDate	1/10/2020	7/1/2020
tblConstructionPhase	PhaseEndDate	3/28/2019	2/28/2019
tblConstructionPhase	PhaseEndDate	4/5/2019	5/28/2020
tblConstructionPhase	PhaseEndDate	1/24/2020	8/13/2020
tblConstructionPhase	PhaseEndDate	4/1/2019	5/28/2020
tblConstructionPhase	PhaseStartDate	1/25/2020	7/1/2019
tblConstructionPhase	PhaseStartDate	4/6/2019	7/1/2019
tblConstructionPhase	PhaseStartDate	4/2/2019	5/1/2020
tblConstructionPhase	PhaseStartDate	3/29/2019	5/1/2020
tblGrading	AcresOfGrading	7.50	0.61
tblGrading	AcresOfGrading	10.00	0.61
tblGrading	MaterialExported	0.00	500.00
tblLandUse	LandUseSquareFeet	268,620.00	186,032.00
tblLandUse	LotAcreage	6.17	0.49
tblOffRoadEquipment	LoadFactor	0.38	0.38
tblOffRoadEquipment	LoadFactor	0.31	0.31
tblOffRoadEquipment	LoadFactor	0.29	0.29
tblOffRoadEquipment	OffRoadEquipmentType		Excavators
tblOffRoadEquipment	OffRoadEquipmentType		Aerial Lifts
tblOffRoadEquipment	OffRoadEquipmentType		Cranes
tblOffRoadEquipment	OffRoadEquipmentType		Pumps
tblOffRoadEquipment	UsageHours	6.00	8.00
tblTripsAndVMT	HaulingTripNumber	63.00	62.00
tblVehicleTrips	ST_TR	8.19	8.82
tblVehicleTrips	SU_TR	5.95	8.82
tblVehicleTrips	WD_TR	8.17	8.82

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

2.0 Emissions Summary**2.1 Overall Construction (Maximum Daily Emission)****Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	11.7394	31.5371	28.8146	0.0609	1.4200	1.4165	2.8365	0.3817	1.3565	1.7381	0.0000	5,923.7078	5,923.7078	0.9562	0.0000	5,947.6126
2020	15.9448	77.2637	59.2959	0.1228	11.7300	3.4865	15.2165	5.8898	3.2630	9.1528	0.0000	11,898.6049	11,898.6049	2.6137	0.0000	11,963.9462
Maximum	15.9448	77.2637	59.2959	0.1228	11.7300	3.4865	15.2165	5.8898	3.2630	9.1528	0.0000	11,898.6049	11,898.6049	2.6137	0.0000	11,963.9462

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	11.7394	31.5371	28.8146	0.0609	1.4200	1.4165	2.8365	0.3817	1.3565	1.7381	0.0000	5,923.7078	5,923.7078	0.9562	0.0000	5,947.6126
2020	15.9448	77.2637	59.2959	0.1228	11.7300	3.4865	15.2165	5.8898	3.2630	9.1528	0.0000	11,898.6049	11,898.6049	2.6137	0.0000	11,963.9462
Maximum	15.9448	77.2637	59.2959	0.1228	11.7300	3.4865	15.2165	5.8898	3.2630	9.1528	0.0000	11,898.6049	11,898.6049	2.6137	0.0000	11,963.9462

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

[illegible]

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

2.2 Overall Operational**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	4.1591	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433
Energy	0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326
Mobile	2.6849	12.8645	30.7793	0.1074	8.3637	0.0845	8.4482	2.2379	0.0789	2.3167		10,924.4803	10,924.4803	0.5468		10,938.1491
Total	6.9757	14.0629	31.8048	0.1145	8.3637	0.1756	8.5393	2.2379	0.1700	2.4079		12,362.4089	12,362.4089	0.5744	0.0264	12,384.6250

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	4.1591	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433
Energy	0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326
Mobile	2.6849	12.8645	30.7793	0.1074	8.3637	0.0845	8.4482	2.2379	0.0789	2.3167		10,924.4803	10,924.4803	0.5468		10,938.1491
Total	6.9757	14.0629	31.8048	0.1145	8.3637	0.1756	8.5393	2.2379	0.1700	2.4079		12,362.4089	12,362.4089	0.5744	0.0264	12,384.6250

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail**Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	3/1/2019	2/28/2019	5	0	
2	Site Preparation	Site Preparation	5/1/2020	5/28/2020	5	20	Victory Park
3	Grading	Grading	5/1/2020	5/28/2020	5	20	Victory Park
4	Building Construction	Building Construction	7/1/2019	7/1/2020	5	263	Breakers Hotel Addition
5	Paving	Paving	1/11/2020	8/13/2020	5	75	Victory Park
6	Architectural Coating	Architectural Coating	7/1/2019	5/1/2020	5	220	Breakers Hotel

Acres of Grading (Site Preparation Phase): 0.61**Acres of Grading (Grading Phase): 0.61****Acres of Paving: 0****Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 279,048; Non-Residential Outdoor: 93,016; Striped Parking Area: 0 (Architectural Coating – sqft)****OffRoad Equipment**

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	1	6.00	9	0.56
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	1	6.00	89	0.20
Site Preparation	Graders	1	8.00	187	0.41
Paving	Pavers	1	6.00	130	0.42
Paving	Rollers	1	7.00	80	0.38
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Rubber Tired Dozers	1	6.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Grading	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Graders	1	6.00	187	0.41
Paving	Paving Equipment	1	8.00	132	0.36
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40
Building Construction	Welders	3	8.00	46	0.45
Grading	Excavators	2	6.00	158	0.38
Building Construction	Aerial Lifts	5	8.00	63	0.31
Building Construction	Cranes	1	8.00	231	0.29
Paving	Pumps	1	4.00	84	0.74

Trips and VMT

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	13.00	0.00	99.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	5	13.00	0.00	62.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	13	89.00	35.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2019

Unmitigated Construction On-Site

[illegible]

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.2 Demolition - 2019

Unmitigated Construction Off-Site

[illegible]

Mitigated Construction On-Site

[illegible]

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.2 Demolition - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

3.3 Site Preparation - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.3017	0.0000	5.3017	2.8999	0.0000	2.8999			0.0000			0.0000
Off-Road	1.6299	18.3464	7.7093	0.0172		0.8210	0.8210		0.7553	0.7553		1,667.4119	1,667.4119	0.5393		1,680.8937
Total	1.6299	18.3464	7.7093	0.0172	5.3017	0.8210	6.1226	2.8999	0.7553	3.6552		1,667.4119	1,667.4119	0.5393		1,680.8937

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.3 Site Preparation - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192
Total	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.3017	0.0000	5.3017	2.8999	0.0000	2.8999			0.0000			0.0000
Off-Road	1.6299	18.3464	7.7093	0.0172		0.8210	0.8210		0.7553	0.7553	0.0000	1,667.4119	1,667.4119	0.5393		1,680.8937
Total	1.6299	18.3464	7.7093	0.0172	5.3017	0.8210	6.1226	2.8999	0.7553	3.6552	0.0000	1,667.4119	1,667.4119	0.5393		1,680.8937

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.3 Site Preparation - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192
Total	0.0362	0.0243	0.3271	9.2000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		91.5534	91.5534	2.6300e-003		91.6192

3.4 Grading - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.5517	0.0000	4.5517	2.4866	0.0000	2.4866			0.0000			0.0000
Off-Road	1.7191	18.7224	11.3805	0.0219		0.8606	0.8606		0.7917	0.7917		2,119.6469	2,119.6469	0.6855		2,136.7853
Total	1.7191	18.7224	11.3805	0.0219	4.5517	0.8606	5.4123	2.4866	0.7917	3.2783		2,119.6469	2,119.6469	0.6855		2,136.7853

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.4 Grading - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0236	0.8436	0.1679	2.4000e-003	0.0542	2.7200e-003	0.0569	0.0149	2.6000e-003	0.0175		259.8821	259.8821	0.0174		260.3180
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0588	0.0395	0.5315	1.4900e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		148.7743	148.7743	4.2800e-003		148.8812
Total	0.0824	0.8832	0.6993	3.8900e-003	0.1995	3.8200e-003	0.2033	0.0534	3.6200e-003	0.0570		408.6563	408.6563	0.0217		409.1992

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.5517	0.0000	4.5517	2.4866	0.0000	2.4866			0.0000			0.0000
Off-Road	1.7191	18.7224	11.3805	0.0219		0.8606	0.8606		0.7917	0.7917	0.0000	2,119.6469	2,119.6469	0.6855		2,136.7853
Total	1.7191	18.7224	11.3805	0.0219	4.5517	0.8606	5.4123	2.4866	0.7917	3.2783	0.0000	2,119.6469	2,119.6469	0.6855		2,136.7853

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.4 Grading - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0236	0.8436	0.1679	2.4000e-003	0.0542	2.7200e-003	0.0569	0.0149	2.6000e-003	0.0175		259.8821	259.8821	0.0174		260.3180
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0588	0.0395	0.5315	1.4900e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		148.7743	148.7743	4.2800e-003		148.8812
Total	0.0824	0.8832	0.6993	3.8900e-003	0.1995	3.8200e-003	0.2033	0.0534	3.6200e-003	0.0570		408.6563	408.6563	0.0217		409.1992

3.5 Building Construction - 2019**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.9753	25.3322	21.1973	0.0361		1.2519	1.2519		1.1937	1.1937		3,411.8325	3,411.8325	0.8289		3,432.5558
Total	2.9753	25.3322	21.1973	0.0361		1.2519	1.2519		1.1937	1.1937		3,411.8325	3,411.8325	0.8289		3,432.5558

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.5 Building Construction - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1349	4.0048	0.9681	9.0700e-003	0.2240	0.0265	0.2505	0.0645	0.0254	0.0899		966.7690	966.7690	0.0640		968.3682
Worker	0.4359	0.3033	3.9991	0.0106	0.9948	7.7400e-003	1.0026	0.2638	7.1300e-003	0.2710		1,051.0802	1,051.0802	0.0329		1,051.9021
Total	0.5708	4.3081	4.9672	0.0196	1.2188	0.0343	1.2531	0.3283	0.0325	0.3608		2,017.8492	2,017.8492	0.0968		2,020.2702

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.9753	25.3322	21.1973	0.0361		1.2519	1.2519		1.1937	1.1937	0.0000	3,411.8325	3,411.8325	0.8289		3,432.5558
Total	2.9753	25.3322	21.1973	0.0361		1.2519	1.2519		1.1937	1.1937	0.0000	3,411.8325	3,411.8325	0.8289		3,432.5558

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.5 Building Construction - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1349	4.0048	0.9681	9.0700e-003	0.2240	0.0265	0.2505	0.0645	0.0254	0.0899		966.7690	966.7690	0.0640		968.3682
Worker	0.4359	0.3033	3.9991	0.0106	0.9948	7.7400e-003	1.0026	0.2638	7.1300e-003	0.2710		1,051.0802	1,051.0802	0.0329		1,051.9021
Total	0.5708	4.3081	4.9672	0.0196	1.2188	0.0343	1.2531	0.3283	0.0325	0.3608		2,017.8492	2,017.8492	0.0968		2,020.2702

3.5 Building Construction - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.6777	23.3439	20.7291	0.0361		1.0880	1.0880		1.0375	1.0375		3,364.6661	3,364.6661	0.8125		3,384.9780
Total	2.6777	23.3439	20.7291	0.0361		1.0880	1.0880		1.0375	1.0375		3,364.6661	3,364.6661	0.8125		3,384.9780

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.5 Building Construction - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1149	3.6727	0.8746	9.0100e-003	0.2240	0.0182	0.2422	0.0645	0.0174	0.0819		960.5696	960.5696	0.0603		962.0773
Worker	0.4027	0.2707	3.6385	0.0102	0.9948	7.5500e-003	1.0024	0.2638	6.9500e-003	0.2708		1,018.5315	1,018.5315	0.0293		1,019.2636
Total	0.5176	3.9434	4.5130	0.0192	1.2188	0.0258	1.2446	0.3283	0.0244	0.3527		1,979.1011	1,979.1011	0.0896		1,981.3409

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.6777	23.3439	20.7291	0.0361		1.0880	1.0880		1.0375	1.0375	0.0000	3,364.6661	3,364.6661	0.8125		3,384.9780
Total	2.6777	23.3439	20.7291	0.0361		1.0880	1.0880		1.0375	1.0375	0.0000	3,364.6661	3,364.6661	0.8125		3,384.9780

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.5 Building Construction - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1149	3.6727	0.8746	9.0100e-003	0.2240	0.0182	0.2422	0.0645	0.0174	0.0819		960.5696	960.5696	0.0603		962.0773
Worker	0.4027	0.2707	3.6385	0.0102	0.9948	7.5500e-003	1.0024	0.2638	6.9500e-003	0.2708		1,018.5315	1,018.5315	0.0293		1,019.2636
Total	0.5176	3.9434	4.5130	0.0192	1.2188	0.0258	1.2446	0.3283	0.0244	0.3527		1,979.1011	1,979.1011	0.0896		1,981.3409

3.6 Paving - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0518	10.2159	10.7571	0.0168		0.5731	0.5731		0.5364	0.5364		1,608.4634	1,608.4634	0.4298		1,619.2078
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	1.0518	10.2159	10.7571	0.0168		0.5731	0.5731		0.5364	0.5364		1,608.4634	1,608.4634	0.4298		1,619.2078

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.6 Paving - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0679	0.0456	0.6132	1.7200e-003	0.1677	1.2700e-003	0.1689	0.0445	1.1700e-003	0.0456		171.6626	171.6626	4.9400e-003		171.7860
Total	0.0679	0.0456	0.6132	1.7200e-003	0.1677	1.2700e-003	0.1689	0.0445	1.1700e-003	0.0456		171.6626	171.6626	4.9400e-003		171.7860

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0518	10.2159	10.7571	0.0168		0.5731	0.5731		0.5364	0.5364	0.0000	1,608.4634	1,608.4634	0.4298		1,619.2078
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	1.0518	10.2159	10.7571	0.0168		0.5731	0.5731		0.5364	0.5364	0.0000	1,608.4634	1,608.4634	0.4298		1,619.2078

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.6 Paving - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0679	0.0456	0.6132	1.7200e-003	0.1677	1.2700e-003	0.1689	0.0445	1.1700e-003	0.0456		171.6626	171.6626	4.9400e-003		171.7860
Total	0.0679	0.0456	0.6132	1.7200e-003	0.1677	1.2700e-003	0.1689	0.0445	1.1700e-003	0.0456		171.6626	171.6626	4.9400e-003		171.7860

3.7 Architectural Coating - 2019**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.8387					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2664	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288		281.4481	281.4481	0.0238		282.0423
Total	8.1052	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288		281.4481	281.4481	0.0238		282.0423

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.7 Architectural Coating - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0882	0.0613	0.8088	2.1400e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4400e-003	0.0548		212.5780	212.5780	6.6500e-003		212.7442
Total	0.0882	0.0613	0.8088	2.1400e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4400e-003	0.0548		212.5780	212.5780	6.6500e-003		212.7442

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.8387					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2664	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288	0.0000	281.4481	281.4481	0.0238		282.0423
Total	8.1052	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288	0.0000	281.4481	281.4481	0.0238		282.0423

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.7 Architectural Coating - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0882	0.0613	0.8088	2.1400e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4400e-003	0.0548		212.5780	212.5780	6.6500e-003		212.7442
Total	0.0882	0.0613	0.8088	2.1400e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4400e-003	0.0548		212.5780	212.5780	6.6500e-003		212.7442

3.7 Architectural Coating - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.8387					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109		281.4481	281.4481	0.0218		281.9928
Total	8.0809	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109		281.4481	281.4481	0.0218		281.9928

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.7 Architectural Coating - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0814	0.0547	0.7359	2.0700e-003	0.2012	1.5300e-003	0.2027	0.0534	1.4100e-003	0.0548		205.9951	205.9951	5.9200e-003		206.1432
Total	0.0814	0.0547	0.7359	2.0700e-003	0.2012	1.5300e-003	0.2027	0.0534	1.4100e-003	0.0548		205.9951	205.9951	5.9200e-003		206.1432

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.8387					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109	0.0000	281.4481	281.4481	0.0218		281.9928
Total	8.0809	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109	0.0000	281.4481	281.4481	0.0218		281.9928

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

3.7 Architectural Coating - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0814	0.0547	0.7359	2.0700e-003	0.2012	1.5300e-003	0.2027	0.0534	1.4100e-003	0.0548		205.9951	205.9951	5.9200e-003		206.1432
Total	0.0814	0.0547	0.7359	2.0700e-003	0.2012	1.5300e-003	0.2027	0.0534	1.4100e-003	0.0548		205.9951	205.9951	5.9200e-003		206.1432

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	2.6849	12.8645	30.7793	0.1074	8.3637	0.0845	8.4482	2.2379	0.0789	2.3167		10,924.4803	10,924.4803	0.5468		10,938.1491
Unmitigated	2.6849	12.8645	30.7793	0.1074	8.3637	0.0845	8.4482	2.2379	0.0789	2.3167		10,924.4803	10,924.4803	0.5468		10,938.1491

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
City Park	1.15	13.88	10.21	12,272	12,272
Hotel	1,631.70	1,631.70	1,631.70	3,893,515	3,893,515
Total	1,632.85	1,645.58	1,641.91	3,905,787	3,905,787

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
City Park	16.60	8.40	6.90	33.00	48.00	19.00	66	28	6
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
City Park	0.548858	0.043235	0.200706	0.120309	0.016131	0.005851	0.021034	0.033479	0.002070	0.001877	0.004817	0.000707	0.000925
Hotel	0.548858	0.043235	0.200706	0.120309	0.016131	0.005851	0.021034	0.033479	0.002070	0.001877	0.004817	0.000707	0.000925

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326
NaturalGas Unmitigated	0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

5.2 Energy by Land Use - NaturalGas**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Hotel	12222	0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326
Total		0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Hotel	12.222	0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326
Total		0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326

6.0 Area Detail**6.1 Mitigation Measures Area**

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	4.1591	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433
Unmitigated	4.1591	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.4725					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	3.6848					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.7800e-003	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433
Total	4.1591	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

6.2 Area by SubCategory**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.4725					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	3.6848					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.7800e-003	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433
Total	4.1591	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433

7.0 Water Detail**7.1 Mitigation Measures Water****8.0 Waste Detail****8.1 Mitigation Measures Waste****9.0 Operational Offroad**

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment**Fire Pumps and Emergency Generators**

Breakers Hotel (1806-19) - South Coast AQMD Air District, Summer

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

Breakers Hotel (1806-19)
South Coast AQMD Air District, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Hotel	185.00	Room	0.49	186,032.00	0
City Park	0.61	Acre	0.61	26,571.60	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	31
Climate Zone	9			Operational Year	2021
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	CH4 Intensity (lb/MWhr)	0.029	N2O Intensity (lb/MWhr)	0.006

1.3 User Entered Comments & Non-Default Data

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

Project Characteristics - Construction timeline from Applicant (March 2019 - March 2021)

Land Use - Adaptive reuse of (E) Breakers Hotel Building (approx 172,000 sf) to a 185-room hotel (back to original building use). New building area added for stairwell and elevator. Total final gross floor area = 186,032 sf (on 0.49 ac lot). The (E) Victory Park is on a separate lot (0.61 ac). Modifications in Victory Park include new landscaping, a reconfigured driveway, and new passive park amenities.

Construction Phase - The project is an adaptive reuse and no building demolition required. Grading and site preparation limited to Victory Park. Victory Park grading and site preparation to start and stop over 20 days (Applicant). Building construction for stairwell addition to occur July 2019 to July 2020 (Applicant). Paving to occur over 75 days (start and stop) (Applicant). Painting and architectural coating to be done in stages during renovation/restoration beginning July 2019 to May 2020.

Off-road Equipment - No Building Demolition required for adaptive reuse.

Off-road Equipment -

Off-road Equipment - 2 excavators operating for 6 hours per day for 4 days (Applicant).

Off-road Equipment - Applicant: 5 lifts operating 8 hours per day for one week. 1 crane operating for 8 hours for 10 days.

Off-road Equipment - 1 pump per day operating for 4 hours per day for 10 days (applicant).

Off-road Equipment -

Grading - Victory Park - Site preparation and grading limited to Victory Park (0.61 ac). Soil export estimated at 500 cy (applicant).

Demolition - Approximately 1,000 tons of debris to be removed.

Vehicle Trips - Total trip generation for the hotel is 1,631 trips per day or 8.82 trips per room. Park trips are default trips.

Energy Use -

Mobile Land Use Mitigation -

Mobile Commute Mitigation - TDM Plan to be implemented for employees and hotel/venue patrons. No mitigation incorporated in analysis for conservative estimate.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10.00	220.00
tblConstructionPhase	NumDays	200.00	263.00
tblConstructionPhase	NumDays	20.00	0.00
tblConstructionPhase	NumDays	4.00	20.00
tblConstructionPhase	NumDays	10.00	75.00
tblConstructionPhase	NumDays	2.00	20.00
tblConstructionPhase	PhaseEndDate	2/7/2020	5/1/2020

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

tblConstructionPhase	PhaseEndDate	1/10/2020	7/1/2020
tblConstructionPhase	PhaseEndDate	3/28/2019	2/28/2019
tblConstructionPhase	PhaseEndDate	4/5/2019	5/28/2020
tblConstructionPhase	PhaseEndDate	1/24/2020	8/13/2020
tblConstructionPhase	PhaseEndDate	4/1/2019	5/28/2020
tblConstructionPhase	PhaseStartDate	1/25/2020	7/1/2019
tblConstructionPhase	PhaseStartDate	4/6/2019	7/1/2019
tblConstructionPhase	PhaseStartDate	4/2/2019	5/1/2020
tblConstructionPhase	PhaseStartDate	3/29/2019	5/1/2020
tblGrading	AcresOfGrading	7.50	0.61
tblGrading	AcresOfGrading	10.00	0.61
tblGrading	MaterialExported	0.00	500.00
tblLandUse	LandUseSquareFeet	268,620.00	186,032.00
tblLandUse	LotAcreage	6.17	0.49
tblOffRoadEquipment	LoadFactor	0.38	0.38
tblOffRoadEquipment	LoadFactor	0.31	0.31
tblOffRoadEquipment	LoadFactor	0.29	0.29
tblOffRoadEquipment	OffRoadEquipmentType		Excavators
tblOffRoadEquipment	OffRoadEquipmentType		Aerial Lifts
tblOffRoadEquipment	OffRoadEquipmentType		Cranes
tblOffRoadEquipment	OffRoadEquipmentType		Pumps
tblOffRoadEquipment	UsageHours	6.00	8.00
tblTripsAndVMT	HaulingTripNumber	63.00	62.00
tblVehicleTrips	ST_TR	8.19	8.82
tblVehicleTrips	SU_TR	5.95	8.82
tblVehicleTrips	WD_TR	8.17	8.82

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

2.0 Emissions Summary**2.1 Overall Construction (Maximum Daily Emission)****Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	11.7919	31.5747	28.4544	0.0598	1.4200	1.4169	2.8369	0.3817	1.3569	1.7385	0.0000	5,814.369 2	5,814.369 2	0.9584	0.0000	5,838.328 4
2020	16.0096	77.3120	58.8268	0.1215	11.7300	3.4869	15.2168	5.8898	3.2633	9.1531	0.0000	11,760.15 14	11,760.15 14	2.6157	0.0000	11,825.54 43
Maximum	16.0096	77.3120	58.8268	0.1215	11.7300	3.4869	15.2168	5.8898	3.2633	9.1531	0.0000	11,760.15 14	11,760.15 14	2.6157	0.0000	11,825.54 43

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	11.7919	31.5747	28.4544	0.0598	1.4200	1.4169	2.8369	0.3817	1.3569	1.7385	0.0000	5,814.369 2	5,814.369 2	0.9584	0.0000	5,838.328 4
2020	16.0096	77.3120	58.8268	0.1215	11.7300	3.4869	15.2168	5.8898	3.2633	9.1531	0.0000	11,760.15 14	11,760.15 14	2.6157	0.0000	11,825.54 43
Maximum	16.0096	77.3120	58.8268	0.1215	11.7300	3.4869	15.2168	5.8898	3.2633	9.1531	0.0000	11,760.15 14	11,760.15 14	2.6157	0.0000	11,825.54 43

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

[illegible]

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

2.2 Overall Operational**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	4.1591	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433
Energy	0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326
Mobile	2.5472	13.0462	29.2594	0.1015	8.3637	0.0852	8.4489	2.2379	0.0795	2.3174		10,333.2165	10,333.2165	0.5509		10,346.9901
Total	6.8380	14.2446	30.2849	0.1087	8.3637	0.1763	8.5400	2.2379	0.1707	2.4085		11,771.1451	11,771.1451	0.5786	0.0264	11,793.4660

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	4.1591	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433
Energy	0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326
Mobile	2.5472	13.0462	29.2594	0.1015	8.3637	0.0852	8.4489	2.2379	0.0795	2.3174		10,333.2165	10,333.2165	0.5509		10,346.9901
Total	6.8380	14.2446	30.2849	0.1087	8.3637	0.1763	8.5400	2.2379	0.1707	2.4085		11,771.1451	11,771.1451	0.5786	0.0264	11,793.4660

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	3/1/2019	2/28/2019	5	0	
2	Site Preparation	Site Preparation	5/1/2020	5/28/2020	5	20	Victory Park
3	Grading	Grading	5/1/2020	5/28/2020	5	20	Victory Park
4	Building Construction	Building Construction	7/1/2019	7/1/2020	5	263	Breakers Hotel Addition
5	Paving	Paving	1/11/2020	8/13/2020	5	75	Victory Park
6	Architectural Coating	Architectural Coating	7/1/2019	5/1/2020	5	220	Breakers Hotel

Acres of Grading (Site Preparation Phase): 0.61

Acres of Grading (Grading Phase): 0.61

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 279,048; Non-Residential Outdoor: 93,016; Striped Parking Area: 0
(Architectural Coating – sqft)

OffRoad Equipment

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	1	6.00	9	0.56
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	1	6.00	89	0.20
Site Preparation	Graders	1	8.00	187	0.41
Paving	Pavers	1	6.00	130	0.42
Paving	Rollers	1	7.00	80	0.38
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Rubber Tired Dozers	1	6.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Grading	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Graders	1	6.00	187	0.41
Paving	Paving Equipment	1	8.00	132	0.36
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40
Building Construction	Welders	3	8.00	46	0.45
Grading	Excavators	2	6.00	158	0.38
Building Construction	Aerial Lifts	5	8.00	63	0.31
Building Construction	Cranes	1	8.00	231	0.29
Paving	Pumps	1	4.00	84	0.74

Trips and VMT

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	13.00	0.00	99.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	5	13.00	0.00	62.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	13	89.00	35.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2019

Unmitigated Construction On-Site

[illegible]

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.2 Demolition - 2019

Unmitigated Construction Off-Site

[illegible]

Mitigated Construction On-Site

[illegible]

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.2 Demolition - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

3.3 Site Preparation - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.3017	0.0000	5.3017	2.8999	0.0000	2.8999			0.0000			0.0000
Off-Road	1.6299	18.3464	7.7093	0.0172		0.8210	0.8210		0.7553	0.7553		1,667.4119	1,667.4119	0.5393		1,680.8937
Total	1.6299	18.3464	7.7093	0.0172	5.3017	0.8210	6.1226	2.8999	0.7553	3.6552		1,667.4119	1,667.4119	0.5393		1,680.8937

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.3 Site Preparation - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906
Total	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					5.3017	0.0000	5.3017	2.8999	0.0000	2.8999			0.0000			0.0000
Off-Road	1.6299	18.3464	7.7093	0.0172		0.8210	0.8210		0.7553	0.7553	0.0000	1,667.4119	1,667.4119	0.5393		1,680.8937
Total	1.6299	18.3464	7.7093	0.0172	5.3017	0.8210	6.1226	2.8999	0.7553	3.6552	0.0000	1,667.4119	1,667.4119	0.5393		1,680.8937

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.3 Site Preparation - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906
Total	0.0395	0.0266	0.2945	8.6000e-004	0.0894	6.8000e-004	0.0901	0.0237	6.2000e-004	0.0243		85.6292	85.6292	2.4600e-003		85.6906

3.4 Grading - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.5517	0.0000	4.5517	2.4866	0.0000	2.4866			0.0000			0.0000
Off-Road	1.7191	18.7224	11.3805	0.0219		0.8606	0.8606		0.7917	0.7917		2,119.6469	2,119.6469	0.6855		2,136.7853
Total	1.7191	18.7224	11.3805	0.0219	4.5517	0.8606	5.4123	2.4866	0.7917	3.2783		2,119.6469	2,119.6469	0.6855		2,136.7853

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.4 Grading - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0242	0.8545	0.1807	2.3600e-003	0.0542	2.7600e-003	0.0569	0.0149	2.6400e-003	0.0175		255.0984	255.0984	0.0182		255.5533
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0642	0.0433	0.4785	1.4000e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		139.1474	139.1474	3.9900e-003		139.2472
Total	0.0884	0.8978	0.6592	3.7600e-003	0.1995	3.8600e-003	0.2033	0.0534	3.6600e-003	0.0570		394.2458	394.2458	0.0222		394.8005

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					4.5517	0.0000	4.5517	2.4866	0.0000	2.4866			0.0000			0.0000
Off-Road	1.7191	18.7224	11.3805	0.0219		0.8606	0.8606		0.7917	0.7917	0.0000	2,119.6469	2,119.6469	0.6855		2,136.7853
Total	1.7191	18.7224	11.3805	0.0219	4.5517	0.8606	5.4123	2.4866	0.7917	3.2783	0.0000	2,119.6469	2,119.6469	0.6855		2,136.7853

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.4 Grading - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0242	0.8545	0.1807	2.3600e-003	0.0542	2.7600e-003	0.0569	0.0149	2.6400e-003	0.0175		255.0984	255.0984	0.0182		255.5533
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0642	0.0433	0.4785	1.4000e-003	0.1453	1.1000e-003	0.1464	0.0385	1.0200e-003	0.0396		139.1474	139.1474	3.9900e-003		139.2472
Total	0.0884	0.8978	0.6592	3.7600e-003	0.1995	3.8600e-003	0.2033	0.0534	3.6600e-003	0.0570		394.2458	394.2458	0.0222		394.8005

3.5 Building Construction - 2019**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.9753	25.3322	21.1973	0.0361		1.2519	1.2519		1.1937	1.1937		3,411.8325	3,411.8325	0.8289		3,432.5558
Total	2.9753	25.3322	21.1973	0.0361		1.2519	1.2519		1.1937	1.1937		3,411.8325	3,411.8325	0.8289		3,432.5558

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.5 Building Construction - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1410	4.0077	1.0782	8.8200e-003	0.2240	0.0269	0.2510	0.0645	0.0258	0.0903		939.1069	939.1069	0.0687		940.8254
Worker	0.4746	0.3322	3.6079	9.8700e-003	0.9948	7.7400e-003	1.0026	0.2638	7.1300e-003	0.2710		983.1436	983.1436	0.0307		983.9115
Total	0.6155	4.3399	4.6861	0.0187	1.2188	0.0347	1.2535	0.3283	0.0329	0.3612		1,922.2506	1,922.2506	0.0995		1,924.7369

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.9753	25.3322	21.1973	0.0361		1.2519	1.2519		1.1937	1.1937	0.0000	3,411.8325	3,411.8325	0.8289		3,432.5558
Total	2.9753	25.3322	21.1973	0.0361		1.2519	1.2519		1.1937	1.1937	0.0000	3,411.8325	3,411.8325	0.8289		3,432.5558

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.5 Building Construction - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1410	4.0077	1.0782	8.8200e-003	0.2240	0.0269	0.2510	0.0645	0.0258	0.0903		939.1069	939.1069	0.0687		940.8254
Worker	0.4746	0.3322	3.6079	9.8700e-003	0.9948	7.7400e-003	1.0026	0.2638	7.1300e-003	0.2710		983.1436	983.1436	0.0307		983.9115
Total	0.6155	4.3399	4.6861	0.0187	1.2188	0.0347	1.2535	0.3283	0.0329	0.3612		1,922.2506	1,922.2506	0.0995		1,924.7369

3.5 Building Construction - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.6777	23.3439	20.7291	0.0361		1.0880	1.0880		1.0375	1.0375		3,364.6661	3,364.6661	0.8125		3,384.9780
Total	2.6777	23.3439	20.7291	0.0361		1.0880	1.0880		1.0375	1.0375		3,364.6661	3,364.6661	0.8125		3,384.9780

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.5 Building Construction - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1204	3.6689	0.9751	8.7500e-003	0.2240	0.0185	0.2425	0.0645	0.0177	0.0822		932.7948	932.7948	0.0648		934.4141
Worker	0.4392	0.2964	3.2760	9.5600e-003	0.9948	7.5500e-003	1.0024	0.2638	6.9500e-003	0.2708		952.6248	952.6248	0.0273		953.3078
Total	0.5596	3.9653	4.2510	0.0183	1.2188	0.0260	1.2448	0.3283	0.0246	0.3529		1,885.4196	1,885.4196	0.0921		1,887.7219

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	2.6777	23.3439	20.7291	0.0361		1.0880	1.0880		1.0375	1.0375	0.0000	3,364.6661	3,364.6661	0.8125		3,384.9780
Total	2.6777	23.3439	20.7291	0.0361		1.0880	1.0880		1.0375	1.0375	0.0000	3,364.6661	3,364.6661	0.8125		3,384.9780

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.5 Building Construction - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.1204	3.6689	0.9751	8.7500e-003	0.2240	0.0185	0.2425	0.0645	0.0177	0.0822		932.7948	932.7948	0.0648		934.4141
Worker	0.4392	0.2964	3.2760	9.5600e-003	0.9948	7.5500e-003	1.0024	0.2638	6.9500e-003	0.2708		952.6248	952.6248	0.0273		953.3078
Total	0.5596	3.9653	4.2510	0.0183	1.2188	0.0260	1.2448	0.3283	0.0246	0.3529		1,885.4196	1,885.4196	0.0921		1,887.7219

3.6 Paving - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0518	10.2159	10.7571	0.0168		0.5731	0.5731		0.5364	0.5364		1,608.4634	1,608.4634	0.4298		1,619.2078
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	1.0518	10.2159	10.7571	0.0168		0.5731	0.5731		0.5364	0.5364		1,608.4634	1,608.4634	0.4298		1,619.2078

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.6 Paving - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0740	0.0500	0.5521	1.6100e-003	0.1677	1.2700e-003	0.1689	0.0445	1.1700e-003	0.0456		160.5547	160.5547	4.6000e-003		160.6699
Total	0.0740	0.0500	0.5521	1.6100e-003	0.1677	1.2700e-003	0.1689	0.0445	1.1700e-003	0.0456		160.5547	160.5547	4.6000e-003		160.6699

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.0518	10.2159	10.7571	0.0168		0.5731	0.5731		0.5364	0.5364	0.0000	1,608.4634	1,608.4634	0.4298		1,619.2078
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	1.0518	10.2159	10.7571	0.0168		0.5731	0.5731		0.5364	0.5364	0.0000	1,608.4634	1,608.4634	0.4298		1,619.2078

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.6 Paving - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0740	0.0500	0.5521	1.6100e-003	0.1677	1.2700e-003	0.1689	0.0445	1.1700e-003	0.0456		160.5547	160.5547	4.6000e-003		160.6699
Total	0.0740	0.0500	0.5521	1.6100e-003	0.1677	1.2700e-003	0.1689	0.0445	1.1700e-003	0.0456		160.5547	160.5547	4.6000e-003		160.6699

3.7 Architectural Coating - 2019**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.8387					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2664	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288		281.4481	281.4481	0.0238		282.0423
Total	8.1052	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288		281.4481	281.4481	0.0238		282.0423

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.7 Architectural Coating - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0960	0.0672	0.7297	2.0000e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4400e-003	0.0548		198.8380	198.8380	6.2100e-003		198.9933
Total	0.0960	0.0672	0.7297	2.0000e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4400e-003	0.0548		198.8380	198.8380	6.2100e-003		198.9933

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.8387					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2664	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288	0.0000	281.4481	281.4481	0.0238		282.0423
Total	8.1052	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288	0.0000	281.4481	281.4481	0.0238		282.0423

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.7 Architectural Coating - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0960	0.0672	0.7297	2.0000e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4400e-003	0.0548		198.8380	198.8380	6.2100e-003		198.9933
Total	0.0960	0.0672	0.7297	2.0000e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4400e-003	0.0548		198.8380	198.8380	6.2100e-003		198.9933

3.7 Architectural Coating - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.8387					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109		281.4481	281.4481	0.0218		281.9928
Total	8.0809	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109		281.4481	281.4481	0.0218		281.9928

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.7 Architectural Coating - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0888	0.0599	0.6626	1.9300e-003	0.2012	1.5300e-003	0.2027	0.0534	1.4100e-003	0.0548		192.6657	192.6657	5.5300e-003		192.8038
Total	0.0888	0.0599	0.6626	1.9300e-003	0.2012	1.5300e-003	0.2027	0.0534	1.4100e-003	0.0548		192.6657	192.6657	5.5300e-003		192.8038

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.8387					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2422	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109	0.0000	281.4481	281.4481	0.0218		281.9928
Total	8.0809	1.6838	1.8314	2.9700e-003		0.1109	0.1109		0.1109	0.1109	0.0000	281.4481	281.4481	0.0218		281.9928

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

3.7 Architectural Coating - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0888	0.0599	0.6626	1.9300e-003	0.2012	1.5300e-003	0.2027	0.0534	1.4100e-003	0.0548		192.6657	192.6657	5.5300e-003		192.8038
Total	0.0888	0.0599	0.6626	1.9300e-003	0.2012	1.5300e-003	0.2027	0.0534	1.4100e-003	0.0548		192.6657	192.6657	5.5300e-003		192.8038

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	2.5472	13.0462	29.2594	0.1015	8.3637	0.0852	8.4489	2.2379	0.0795	2.3174		10,333.2165	10,333.2165	0.5509		10,346.9901
Unmitigated	2.5472	13.0462	29.2594	0.1015	8.3637	0.0852	8.4489	2.2379	0.0795	2.3174		10,333.2165	10,333.2165	0.5509		10,346.9901

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
City Park	1.15	13.88	10.21	12,272	12,272
Hotel	1,631.70	1,631.70	1,631.70	3,893,515	3,893,515
Total	1,632.85	1,645.58	1,641.91	3,905,787	3,905,787

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
City Park	16.60	8.40	6.90	33.00	48.00	19.00	66	28	6
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
City Park	0.548858	0.043235	0.200706	0.120309	0.016131	0.005851	0.021034	0.033479	0.002070	0.001877	0.004817	0.000707	0.000925
Hotel	0.548858	0.043235	0.200706	0.120309	0.016131	0.005851	0.021034	0.033479	0.002070	0.001877	0.004817	0.000707	0.000925

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326
NaturalGas Unmitigated	0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

5.2 Energy by Land Use - NaturalGas**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Hotel	12222	0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326
Total		0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Hotel	12.222	0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326
Total		0.1318	1.1982	1.0065	7.1900e-003		0.0911	0.0911		0.0911	0.0911		1,437.8880	1,437.8880	0.0276	0.0264	1,446.4326

6.0 Area Detail**6.1 Mitigation Measures Area**

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	4.1591	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433
Unmitigated	4.1591	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.4725					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	3.6848					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.7800e-003	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433
Total	4.1591	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

6.2 Area by SubCategory**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.4725					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	3.6848					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.7800e-003	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433
Total	4.1591	1.7000e-004	0.0190	0.0000		7.0000e-005	7.0000e-005		7.0000e-005	7.0000e-005		0.0406	0.0406	1.1000e-004		0.0433

7.0 Water Detail**7.1 Mitigation Measures Water****8.0 Waste Detail****8.1 Mitigation Measures Waste****9.0 Operational Offroad**

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment**Fire Pumps and Emergency Generators**

Breakers Hotel (1806-19) - South Coast AQMD Air District, Winter

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

Breakers Hotel (1806-19) - South Coast AQMD Air District, Annual

Breakers Hotel (1806-19)
South Coast AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Hotel	185.00	Room	0.49	186,032.00	0
City Park	0.61	Acre	0.61	26,571.60	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	31
Climate Zone	9			Operational Year	2021
Utility Company	Southern California Edison				
CO2 Intensity (lb/MW hr)	702.44	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	0.006

1.3 User Entered Comments & Non-Default Data

Breakers Hotel (1806-19) - South Coast AQMD Air District, Annual

Project Characteristics - Construction timeline from Applicant (March 2019 - March 2021)

Land Use - Adaptive reuse of (E) Breakers Hotel Building (approx 172,000 sf) to a 185-room hotel (back to original building use). New building area added for stairwell and elevator. Total final gross floor area = 186,032 sf (on 0.49 ac lot). The (E) Victory Park is on a separate lot (0.61 ac). Modifications in Victory Park include new landscaping, a reconfigured driveway, and new passive park amenities.

Construction Phase - The project is an adaptive reuse and no building demolition required. Grading and site preparation limited to Victory Park. Victory Park grading and site preparation to start and stop over 20 days (Applicant). Building construction for stairwell addition to occur July 2019 to July 2020 (Applicant). Paving to occur over 75 days (start and stop) (Applicant). Painting and architectural coating to be done in stages during renovation/restoration beginning July 2019 to May 2020.

Off-road Equipment - No Building Demolition required for adaptive reuse.

Off-road Equipment -

Off-road Equipment - 2 excavators operating for 6 hours per day for 4 days (Applicant).

Off-road Equipment - Applicant: 5 lifts operating 8 hours per day for one week. 1 crane operating for 8 hours for 10 days.

Off-road Equipment - 1 pump per day operating for 4 hours per day for 10 days (applicant).

Off-road Equipment -

Grading - Victory Park - Site preparation and grading limited to Victory Park (0.61 ac). Soil export estimated at 500 cy (applicant).

Demolition - Approximately 1,000 tons of debris to be removed.

Vehicle Trips - Total trip generation for the hotel is 1,631 trips per day or 8.82 trips per room. Park trips are default trips.

Energy Use -

Mobile Land Use Mitigation -

Mobile Commute Mitigation - TDM Plan to be implemented for employees and hotel/venue patrons. No mitigation incorporated in analysis for conservative estimate.

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10.00	220.00
tblConstructionPhase	NumDays	200.00	263.00
tblConstructionPhase	NumDays	20.00	0.00
tblConstructionPhase	NumDays	4.00	20.00
tblConstructionPhase	NumDays	10.00	75.00
tblConstructionPhase	NumDays	2.00	20.00
tblConstructionPhase	PhaseEndDate	2/7/2020	5/1/2020

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tblConstructionPhase	PhaseEndDate	1/10/2020	7/1/2020
tblConstructionPhase	PhaseEndDate	3/28/2019	2/28/2019
tblConstructionPhase	PhaseEndDate	4/5/2019	5/28/2020
tblConstructionPhase	PhaseEndDate	1/24/2020	8/13/2020
tblConstructionPhase	PhaseEndDate	4/1/2019	5/28/2020
tblConstructionPhase	PhaseStartDate	1/25/2020	7/1/2019
tblConstructionPhase	PhaseStartDate	4/6/2019	7/1/2019
tblConstructionPhase	PhaseStartDate	4/2/2019	5/1/2020
tblConstructionPhase	PhaseStartDate	3/29/2019	5/1/2020
tblGrading	AcresOfGrading	7.50	0.61
tblGrading	AcresOfGrading	10.00	0.61
tblGrading	MaterialExported	0.00	500.00
tblLandUse	LandUseSquareFeet	268,620.00	186,032.00
tblLandUse	LotAcreage	6.17	0.49
tblOffRoadEquipment	LoadFactor	0.38	0.38
tblOffRoadEquipment	LoadFactor	0.31	0.31
tblOffRoadEquipment	LoadFactor	0.29	0.29
tblOffRoadEquipment	OffRoadEquipmentType		Excavators
tblOffRoadEquipment	OffRoadEquipmentType		Aerial Lifts
tblOffRoadEquipment	OffRoadEquipmentType		Cranes
tblOffRoadEquipment	OffRoadEquipmentType		Pumps
tblOffRoadEquipment	UsageHours	6.00	8.00
tblTripsAndVMT	HaulingTripNumber	63.00	62.00
tblVehicleTrips	ST_TR	8.19	8.82
tblVehicleTrips	SU_TR	5.95	8.82
tblVehicleTrips	WD_TR	8.17	8.82

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2.0 Emissions Summary**2.1 Overall Construction****Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2019	0.7745	2.0895	1.8825	3.9700e-003	0.0927	0.0935	0.1862	0.0249	0.0895	0.1145	0.0000	350.3035	350.3035	0.0573	0.0000	351.7351
2020	0.6890	3.0411	2.8223	5.6600e-003	0.2011	0.1390	0.3401	0.0815	0.1314	0.2129	0.0000	495.4806	495.4806	0.0964	0.0000	497.8907
Maximum	0.7745	3.0411	2.8223	5.6600e-003	0.2011	0.1390	0.3401	0.0815	0.1314	0.2129	0.0000	495.4806	495.4806	0.0964	0.0000	497.8907

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2019	0.7745	2.0895	1.8825	3.9700e-003	0.0927	0.0935	0.1862	0.0249	0.0895	0.1145	0.0000	350.3032	350.3032	0.0573	0.0000	351.7348
2020	0.6890	3.0411	2.8223	5.6600e-003	0.2011	0.1390	0.3401	0.0815	0.1314	0.2129	0.0000	495.4802	495.4802	0.0964	0.0000	497.8903
Maximum	0.7745	3.0411	2.8223	5.6600e-003	0.2011	0.1390	0.3401	0.0815	0.1314	0.2129	0.0000	495.4802	495.4802	0.0964	0.0000	497.8903

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
2	6-1-2019	8-31-2019	0.9583	0.9583
3	9-1-2019	11-30-2019	1.4084	1.4084
4	12-1-2019	2-29-2020	1.5506	1.5506
5	3-1-2020	5-31-2020	2.0102	2.0102
6	6-1-2020	8-31-2020	0.6383	0.6383
		Highest	2.0102	2.0102

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.7589	2.0000e-005	2.3800e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	4.6100e-003	4.6100e-003	1.0000e-005	0.0000	4.9100e-003
Energy	0.0241	0.2187	0.1837	1.3100e-003		0.0166	0.0166		0.0166	0.0166	0.0000	687.3537	687.3537	0.0231	8.2000e-003	690.3758
Mobile	0.4492	2.4013	5.3529	0.0186	1.4841	0.0153	1.4994	0.3977	0.0143	0.4120	0.0000	1,720.858 1	1,720.858 1	0.0894	0.0000	1,723.094 1
Waste						0.0000	0.0000		0.0000	0.0000	20.5711	0.0000	20.5711	1.2157	0.0000	50.9640
Water						0.0000	0.0000		0.0000	0.0000	1.4888	23.8882	25.3770	0.1539	3.8100e-003	30.3614
Total	1.2322	2.6200	5.5390	0.0199	1.4841	0.0319	1.5160	0.3977	0.0309	0.4286	22.0599	2,432.104 6	2,454.164 5	1.4822	0.0120	2,494.800 2

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2.2 Overall Operational**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.7589	2.0000e-005	2.3800e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	4.6100e-003	4.6100e-003	1.0000e-005	0.0000	4.9100e-003
Energy	0.0241	0.2187	0.1837	1.3100e-003		0.0166	0.0166		0.0166	0.0166	0.0000	687.3537	687.3537	0.0231	8.2000e-003	690.3758
Mobile	0.4492	2.4013	5.3529	0.0186	1.4841	0.0153	1.4994	0.3977	0.0143	0.4120	0.0000	1,720.8581	1,720.8581	0.0894	0.0000	1,723.0941
Waste						0.0000	0.0000		0.0000	0.0000	20.5711	0.0000	20.5711	1.2157	0.0000	50.9640
Water						0.0000	0.0000		0.0000	0.0000	1.4888	23.8882	25.3770	0.1539	3.8100e-003	30.3614
Total	1.2322	2.6200	5.5390	0.0199	1.4841	0.0319	1.5160	0.3977	0.0309	0.4286	22.0599	2,432.1046	2,454.1645	1.4822	0.0120	2,494.8002

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail**Construction Phase**

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Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	3/1/2019	2/28/2019	5	0	
2	Site Preparation	Site Preparation	5/1/2020	5/28/2020	5	20	Victory Park
3	Grading	Grading	5/1/2020	5/28/2020	5	20	Victory Park
4	Building Construction	Building Construction	7/1/2019	7/1/2020	5	263	Breakers Hotel Addition
5	Paving	Paving	1/11/2020	8/13/2020	5	75	Victory Park
6	Architectural Coating	Architectural Coating	7/1/2019	5/1/2020	5	220	Breakers Hotel

Acres of Grading (Site Preparation Phase): 0.61

Acres of Grading (Grading Phase): 0.61

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 279,048; Non-Residential Outdoor: 93,016; Striped Parking Area: 0
(Architectural Coating – sqft)

OffRoad Equipment

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Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	1	6.00	9	0.56
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	1	6.00	89	0.20
Site Preparation	Graders	1	8.00	187	0.41
Paving	Pavers	1	6.00	130	0.42
Paving	Rollers	1	7.00	80	0.38
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Rubber Tired Dozers	1	6.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Grading	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Graders	1	6.00	187	0.41
Paving	Paving Equipment	1	8.00	132	0.36
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40
Building Construction	Welders	3	8.00	46	0.45
Grading	Excavators	2	6.00	158	0.38
Building Construction	Aerial Lifts	5	8.00	63	0.31
Building Construction	Cranes	1	8.00	231	0.29
Paving	Pumps	1	4.00	84	0.74

Trips and VMT

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Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	13.00	0.00	99.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	5	13.00	0.00	62.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	13	89.00	35.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	15.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2019

Unmitigated Construction On-Site

[illegible]

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3.2 Demolition - 2019

Unmitigated Construction Off-Site

[illegible]

Mitigated Construction On-Site

[illegible]

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3.2 Demolition - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

3.3 Site Preparation - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0530	0.0000	0.0530	0.0290	0.0000	0.0290	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0163	0.1835	0.0771	1.7000e-004		8.2100e-003	8.2100e-003		7.5500e-003	7.5500e-003	0.0000	15.1265	15.1265	4.8900e-003	0.0000	15.2488
Total	0.0163	0.1835	0.0771	1.7000e-004	0.0530	8.2100e-003	0.0612	0.0290	7.5500e-003	0.0366	0.0000	15.1265	15.1265	4.8900e-003	0.0000	15.2488

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3.3 Site Preparation - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.6000e-004	2.7000e-004	3.0300e-003	1.0000e-005	8.8000e-004	1.0000e-005	8.8000e-004	2.3000e-004	1.0000e-005	2.4000e-004	0.0000	0.7901	0.7901	2.0000e-005	0.0000	0.7907
Total	3.6000e-004	2.7000e-004	3.0300e-003	1.0000e-005	8.8000e-004	1.0000e-005	8.8000e-004	2.3000e-004	1.0000e-005	2.4000e-004	0.0000	0.7901	0.7901	2.0000e-005	0.0000	0.7907

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0530	0.0000	0.0530	0.0290	0.0000	0.0290	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0163	0.1835	0.0771	1.7000e-004		8.2100e-003	8.2100e-003		7.5500e-003	7.5500e-003	0.0000	15.1265	15.1265	4.8900e-003	0.0000	15.2488
Total	0.0163	0.1835	0.0771	1.7000e-004	0.0530	8.2100e-003	0.0612	0.0290	7.5500e-003	0.0366	0.0000	15.1265	15.1265	4.8900e-003	0.0000	15.2488

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3.3 Site Preparation - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.6000e-004	2.7000e-004	3.0300e-003	1.0000e-005	8.8000e-004	1.0000e-005	8.8000e-004	2.3000e-004	1.0000e-005	2.4000e-004	0.0000	0.7901	0.7901	2.0000e-005	0.0000	0.7907
Total	3.6000e-004	2.7000e-004	3.0300e-003	1.0000e-005	8.8000e-004	1.0000e-005	8.8000e-004	2.3000e-004	1.0000e-005	2.4000e-004	0.0000	0.7901	0.7901	2.0000e-005	0.0000	0.7907

3.4 Grading - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0455	0.0000	0.0455	0.0249	0.0000	0.0249	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0172	0.1872	0.1138	2.2000e-004		8.6100e-003	8.6100e-003		7.9200e-003	7.9200e-003	0.0000	19.2291	19.2291	6.2200e-003	0.0000	19.3846
Total	0.0172	0.1872	0.1138	2.2000e-004	0.0455	8.6100e-003	0.0541	0.0249	7.9200e-003	0.0328	0.0000	19.2291	19.2291	6.2200e-003	0.0000	19.3846

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3.4 Grading - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.4000e-004	8.7000e-003	1.7300e-003	2.0000e-005	5.3000e-004	3.0000e-005	5.6000e-004	1.5000e-004	3.0000e-005	1.7000e-004	0.0000	2.3394	2.3394	1.6000e-004	0.0000	2.3434
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8000e-004	4.4000e-004	4.9200e-003	1.0000e-005	1.4300e-003	1.0000e-005	1.4400e-003	3.8000e-004	1.0000e-005	3.9000e-004	0.0000	1.2840	1.2840	4.0000e-005	0.0000	1.2849
Total	8.2000e-004	9.1400e-003	6.6500e-003	3.0000e-005	1.9600e-003	4.0000e-005	2.0000e-003	5.3000e-004	4.0000e-005	5.6000e-004	0.0000	3.6234	3.6234	2.0000e-004	0.0000	3.6283

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0455	0.0000	0.0455	0.0249	0.0000	0.0249	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0172	0.1872	0.1138	2.2000e-004		8.6100e-003	8.6100e-003		7.9200e-003	7.9200e-003	0.0000	19.2291	19.2291	6.2200e-003	0.0000	19.3846
Total	0.0172	0.1872	0.1138	2.2000e-004	0.0455	8.6100e-003	0.0541	0.0249	7.9200e-003	0.0328	0.0000	19.2291	19.2291	6.2200e-003	0.0000	19.3846

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3.4 Grading - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	2.4000e-004	8.7000e-003	1.7300e-003	2.0000e-005	5.3000e-004	3.0000e-005	5.6000e-004	1.5000e-004	3.0000e-005	1.7000e-004	0.0000	2.3394	2.3394	1.6000e-004	0.0000	2.3434
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8000e-004	4.4000e-004	4.9200e-003	1.0000e-005	1.4300e-003	1.0000e-005	1.4400e-003	3.8000e-004	1.0000e-005	3.9000e-004	0.0000	1.2840	1.2840	4.0000e-005	0.0000	1.2849
Total	8.2000e-004	9.1400e-003	6.6500e-003	3.0000e-005	1.9600e-003	4.0000e-005	2.0000e-003	5.3000e-004	4.0000e-005	5.6000e-004	0.0000	3.6234	3.6234	2.0000e-004	0.0000	3.6283

3.5 Building Construction - 2019**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1964	1.6719	1.3990	2.3800e-003		0.0826	0.0826		0.0788	0.0788	0.0000	204.2807	204.2807	0.0496	0.0000	205.5215
Total	0.1964	1.6719	1.3990	2.3800e-003		0.0826	0.0826		0.0788	0.0788	0.0000	204.2807	204.2807	0.0496	0.0000	205.5215

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3.5 Building Construction - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	9.0700e-003	0.2694	0.0675	5.9000e-004	0.0146	1.7600e-003	0.0163	4.2000e-003	1.6900e-003	5.8900e-003	0.0000	57.1889	57.1889	3.9600e-003	0.0000	57.2878
Worker	0.0284	0.0225	0.2449	6.6000e-004	0.0645	5.1000e-004	0.0650	0.0171	4.7000e-004	0.0176	0.0000	59.8732	59.8732	1.8700e-003	0.0000	59.9200
Total	0.0374	0.2919	0.3124	1.2500e-003	0.0790	2.2700e-003	0.0813	0.0213	2.1600e-003	0.0235	0.0000	117.0621	117.0621	5.8300e-003	0.0000	117.2078

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1964	1.6719	1.3990	2.3800e-003		0.0826	0.0826		0.0788	0.0788	0.0000	204.2805	204.2805	0.0496	0.0000	205.5213
Total	0.1964	1.6719	1.3990	2.3800e-003		0.0826	0.0826		0.0788	0.0788	0.0000	204.2805	204.2805	0.0496	0.0000	205.5213

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3.5 Building Construction - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	9.0700e-003	0.2694	0.0675	5.9000e-004	0.0146	1.7600e-003	0.0163	4.2000e-003	1.6900e-003	5.8900e-003	0.0000	57.1889	57.1889	3.9600e-003	0.0000	57.2878
Worker	0.0284	0.0225	0.2449	6.6000e-004	0.0645	5.1000e-004	0.0650	0.0171	4.7000e-004	0.0176	0.0000	59.8732	59.8732	1.8700e-003	0.0000	59.9200
Total	0.0374	0.2919	0.3124	1.2500e-003	0.0790	2.2700e-003	0.0813	0.0213	2.1600e-003	0.0235	0.0000	117.0621	117.0621	5.8300e-003	0.0000	117.2078

3.5 Building Construction - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1754	1.5290	1.3578	2.3700e-003		0.0713	0.0713		0.0680	0.0680	0.0000	199.9305	199.9305	0.0483	0.0000	201.1374
Total	0.1754	1.5290	1.3578	2.3700e-003		0.0713	0.0713		0.0680	0.0680	0.0000	199.9305	199.9305	0.0483	0.0000	201.1374

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3.5 Building Construction - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	7.6800e-003	0.2447	0.0606	5.8000e-004	0.0145	1.2000e-003	0.0157	4.1700e-003	1.1500e-003	5.3200e-003	0.0000	56.3845	56.3845	3.7000e-003	0.0000	56.4770
Worker	0.0260	0.0200	0.2208	6.4000e-004	0.0640	4.9000e-004	0.0645	0.0170	4.6000e-004	0.0174	0.0000	57.5760	57.5760	1.6500e-003	0.0000	57.6173
Total	0.0337	0.2646	0.2814	1.2200e-003	0.0784	1.6900e-003	0.0801	0.0212	1.6100e-003	0.0228	0.0000	113.9605	113.9605	5.3500e-003	0.0000	114.0943

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1754	1.5290	1.3578	2.3700e-003		0.0713	0.0713		0.0680	0.0680	0.0000	199.9302	199.9302	0.0483	0.0000	201.1372
Total	0.1754	1.5290	1.3578	2.3700e-003		0.0713	0.0713		0.0680	0.0680	0.0000	199.9302	199.9302	0.0483	0.0000	201.1372

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3.5 Building Construction - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	7.6800e-003	0.2447	0.0606	5.8000e-004	0.0145	1.2000e-003	0.0157	4.1700e-003	1.1500e-003	5.3200e-003	0.0000	56.3845	56.3845	3.7000e-003	0.0000	56.4770
Worker	0.0260	0.0200	0.2208	6.4000e-004	0.0640	4.9000e-004	0.0645	0.0170	4.6000e-004	0.0174	0.0000	57.5760	57.5760	1.6500e-003	0.0000	57.6173
Total	0.0337	0.2646	0.2814	1.2200e-003	0.0784	1.6900e-003	0.0801	0.0212	1.6100e-003	0.0228	0.0000	113.9605	113.9605	5.3500e-003	0.0000	114.0943

3.6 Paving - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0810	0.7866	0.8283	1.3000e-003		0.0441	0.0441		0.0413	0.0413	0.0000	112.3564	112.3564	0.0300	0.0000	113.1069
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0810	0.7866	0.8283	1.3000e-003		0.0441	0.0441		0.0413	0.0413	0.0000	112.3564	112.3564	0.0300	0.0000	113.1069

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3.6 Paving - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.1600e-003	3.9500e-003	0.0437	1.3000e-004	0.0127	1.0000e-004	0.0128	3.3700e-003	9.0000e-005	3.4600e-003	0.0000	11.4075	11.4075	3.3000e-004	0.0000	11.4157
Total	5.1600e-003	3.9500e-003	0.0437	1.3000e-004	0.0127	1.0000e-004	0.0128	3.3700e-003	9.0000e-005	3.4600e-003	0.0000	11.4075	11.4075	3.3000e-004	0.0000	11.4157

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0810	0.7866	0.8283	1.3000e-003		0.0441	0.0441		0.0413	0.0413	0.0000	112.3562	112.3562	0.0300	0.0000	113.1068
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0810	0.7866	0.8283	1.3000e-003		0.0441	0.0441		0.0413	0.0413	0.0000	112.3562	112.3562	0.0300	0.0000	113.1068

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3.6 Paving - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.1600e-003	3.9500e-003	0.0437	1.3000e-004	0.0127	1.0000e-004	0.0128	3.3700e-003	9.0000e-005	3.4600e-003	0.0000	11.4075	11.4075	3.3000e-004	0.0000	11.4157
Total	5.1600e-003	3.9500e-003	0.0437	1.3000e-004	0.0127	1.0000e-004	0.0128	3.3700e-003	9.0000e-005	3.4600e-003	0.0000	11.4075	11.4075	3.3000e-004	0.0000	11.4157

3.7 Architectural Coating - 2019**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.5174					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0176	0.1211	0.1215	2.0000e-004		8.5000e-003	8.5000e-003		8.5000e-003	8.5000e-003	0.0000	16.8515	16.8515	1.4200e-003	0.0000	16.8871
Total	0.5349	0.1211	0.1215	2.0000e-004		8.5000e-003	8.5000e-003		8.5000e-003	8.5000e-003	0.0000	16.8515	16.8515	1.4200e-003	0.0000	16.8871

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3.7 Architectural Coating - 2019**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.7400e-003	4.5600e-003	0.0495	1.3000e-004	0.0130	1.0000e-004	0.0131	3.4600e-003	1.0000e-004	3.5600e-003	0.0000	12.1092	12.1092	3.8000e-004	0.0000	12.1187
Total	5.7400e-003	4.5600e-003	0.0495	1.3000e-004	0.0130	1.0000e-004	0.0131	3.4600e-003	1.0000e-004	3.5600e-003	0.0000	12.1092	12.1092	3.8000e-004	0.0000	12.1187

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.5174					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0176	0.1211	0.1215	2.0000e-004		8.5000e-003	8.5000e-003		8.5000e-003	8.5000e-003	0.0000	16.8515	16.8515	1.4200e-003	0.0000	16.8870
Total	0.5349	0.1211	0.1215	2.0000e-004		8.5000e-003	8.5000e-003		8.5000e-003	8.5000e-003	0.0000	16.8515	16.8515	1.4200e-003	0.0000	16.8870

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3.7 Architectural Coating - 2019**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.7400e-003	4.5600e-003	0.0495	1.3000e-004	0.0130	1.0000e-004	0.0131	3.4600e-003	1.0000e-004	3.5600e-003	0.0000	12.1092	12.1092	3.8000e-004	0.0000	12.1187
Total	5.7400e-003	4.5600e-003	0.0495	1.3000e-004	0.0130	1.0000e-004	0.0131	3.4600e-003	1.0000e-004	3.5600e-003	0.0000	12.1092	12.1092	3.8000e-004	0.0000	12.1187

3.7 Architectural Coating - 2020**Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.3449					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0107	0.0741	0.0806	1.3000e-004		4.8800e-003	4.8800e-003		4.8800e-003	4.8800e-003	0.0000	11.2343	11.2343	8.7000e-004	0.0000	11.2561
Total	0.3556	0.0741	0.0806	1.3000e-004		4.8800e-003	4.8800e-003		4.8800e-003	4.8800e-003	0.0000	11.2343	11.2343	8.7000e-004	0.0000	11.2561

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3.7 Architectural Coating - 2020**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.5400e-003	2.7100e-003	0.0300	9.0000e-005	8.6900e-003	7.0000e-005	8.7600e-003	2.3100e-003	6.0000e-005	2.3700e-003	0.0000	7.8223	7.8223	2.2000e-004	0.0000	7.8279
Total	3.5400e-003	2.7100e-003	0.0300	9.0000e-005	8.6900e-003	7.0000e-005	8.7600e-003	2.3100e-003	6.0000e-005	2.3700e-003	0.0000	7.8223	7.8223	2.2000e-004	0.0000	7.8279

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.3449					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0107	0.0741	0.0806	1.3000e-004		4.8800e-003	4.8800e-003		4.8800e-003	4.8800e-003	0.0000	11.2343	11.2343	8.7000e-004	0.0000	11.2561
Total	0.3556	0.0741	0.0806	1.3000e-004		4.8800e-003	4.8800e-003		4.8800e-003	4.8800e-003	0.0000	11.2343	11.2343	8.7000e-004	0.0000	11.2561

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3.7 Architectural Coating - 2020**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.5400e-003	2.7100e-003	0.0300	9.0000e-005	8.6900e-003	7.0000e-005	8.7600e-003	2.3100e-003	6.0000e-005	2.3700e-003	0.0000	7.8223	7.8223	2.2000e-004	0.0000	7.8279
Total	3.5400e-003	2.7100e-003	0.0300	9.0000e-005	8.6900e-003	7.0000e-005	8.7600e-003	2.3100e-003	6.0000e-005	2.3700e-003	0.0000	7.8223	7.8223	2.2000e-004	0.0000	7.8279

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.4492	2.4013	5.3529	0.0186	1.4841	0.0153	1.4994	0.3977	0.0143	0.4120	0.0000	1,720.858 1	1,720.858 1	0.0894	0.0000	1,723.094 1
Unmitigated	0.4492	2.4013	5.3529	0.0186	1.4841	0.0153	1.4994	0.3977	0.0143	0.4120	0.0000	1,720.858 1	1,720.858 1	0.0894	0.0000	1,723.094 1

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
City Park	1.15	13.88	10.21	12,272	12,272
Hotel	1,631.70	1,631.70	1,631.70	3,893,515	3,893,515
Total	1,632.85	1,645.58	1,641.91	3,905,787	3,905,787

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
City Park	16.60	8.40	6.90	33.00	48.00	19.00	66	28	6
Hotel	16.60	8.40	6.90	19.40	61.60	19.00	58	38	4

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
City Park	0.548858	0.043235	0.200706	0.120309	0.016131	0.005851	0.021034	0.033479	0.002070	0.001877	0.004817	0.000707	0.000925
Hotel	0.548858	0.043235	0.200706	0.120309	0.016131	0.005851	0.021034	0.033479	0.002070	0.001877	0.004817	0.000707	0.000925

Breakers Hotel (1806-19) - South Coast AQMD Air District, Annual

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	449.2953	449.2953	0.0186	3.8400e-003	450.9026
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	449.2953	449.2953	0.0186	3.8400e-003	450.9026
NaturalGas Mitigated	0.0241	0.2187	0.1837	1.3100e-003		0.0166	0.0166		0.0166	0.0166	0.0000	238.0585	238.0585	4.5600e-003	4.3600e-003	239.4731
NaturalGas Unmitigated	0.0241	0.2187	0.1837	1.3100e-003		0.0166	0.0166		0.0166	0.0166	0.0000	238.0585	238.0585	4.5600e-003	4.3600e-003	239.4731

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5.2 Energy by Land Use - NaturalGas**Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hotel	4.46105e+006	0.0241	0.2187	0.1837	1.3100e-003		0.0166	0.0166		0.0166	0.0166	0.0000	238.0585	238.0585	4.5600e-003	4.3600e-003	239.4731
Total		0.0241	0.2187	0.1837	1.3100e-003		0.0166	0.0166		0.0166	0.0166	0.0000	238.0585	238.0585	4.5600e-003	4.3600e-003	239.4731

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hotel	4.46105e+006	0.0241	0.2187	0.1837	1.3100e-003		0.0166	0.0166		0.0166	0.0166	0.0000	238.0585	238.0585	4.5600e-003	4.3600e-003	239.4731
Total		0.0241	0.2187	0.1837	1.3100e-003		0.0166	0.0166		0.0166	0.0166	0.0000	238.0585	238.0585	4.5600e-003	4.3600e-003	239.4731

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5.3 Energy by Land Use - Electricity**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
City Park	0	0.0000	0.0000	0.0000	0.0000
Hotel	1.41012e+006	449.2953	0.0186	3.8400e-003	450.9026
Total		449.2953	0.0186	3.8400e-003	450.9026

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
City Park	0	0.0000	0.0000	0.0000	0.0000
Hotel	1.41012e+006	449.2953	0.0186	3.8400e-003	450.9026
Total		449.2953	0.0186	3.8400e-003	450.9026

6.0 Area Detail**6.1 Mitigation Measures Area**

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.7589	2.0000e-005	2.3800e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	4.6100e-003	4.6100e-003	1.0000e-005	0.0000	4.9100e-003
Unmitigated	0.7589	2.0000e-005	2.3800e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	4.6100e-003	4.6100e-003	1.0000e-005	0.0000	4.9100e-003

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0862					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.6725					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.2000e-004	2.0000e-005	2.3800e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	4.6100e-003	4.6100e-003	1.0000e-005	0.0000	4.9100e-003
Total	0.7589	2.0000e-005	2.3800e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	4.6100e-003	4.6100e-003	1.0000e-005	0.0000	4.9100e-003

Breakers Hotel (1806-19) - South Coast AQMD Air District, Annual

6.2 Area by SubCategory**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0862					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.6725					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	2.2000e-004	2.0000e-005	2.3800e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	4.6100e-003	4.6100e-003	1.0000e-005	0.0000	4.9100e-003
Total	0.7589	2.0000e-005	2.3800e-003	0.0000		1.0000e-005	1.0000e-005		1.0000e-005	1.0000e-005	0.0000	4.6100e-003	4.6100e-003	1.0000e-005	0.0000	4.9100e-003

7.0 Water Detail**7.1 Mitigation Measures Water**

Breakers Hotel (1806-19) - South Coast AQMD Air District, Annual

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	25.3770	0.1539	3.8100e-003	30.3614
Unmitigated	25.3770	0.1539	3.8100e-003	30.3614

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
City Park	0 / 0.726804	2.5728	1.1000e-004	2.0000e-005	2.5820
Hotel	4.69285 / 0.521428	22.8042	0.1538	3.7900e-003	27.7793
Total		25.3770	0.1539	3.8100e-003	30.3613

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7.2 Water by Land Use**Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
City Park	0 / 0.726804	2.5728	1.1000e-004	2.0000e-005	2.5820
Hotel	4.69285 / 0.521428	22.8042	0.1538	3.7900e-003	27.7793
Total		25.3770	0.1539	3.8100e-003	30.3613

8.0 Waste Detail**8.1 Mitigation Measures Waste****Category/Year**

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	20.5711	1.2157	0.0000	50.9640
Unmitigated	20.5711	1.2157	0.0000	50.9640

Breakers Hotel (1806-19) - South Coast AQMD Air District, Annual

8.2 Waste by Land Use**Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
City Park	0.05	0.0102	6.0000e-004	0.0000	0.0252
Hotel	101.29	20.5610	1.2151	0.0000	50.9389
Total		20.5711	1.2157	0.0000	50.9640

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
City Park	0.05	0.0102	6.0000e-004	0.0000	0.0252
Hotel	101.29	20.5610	1.2151	0.0000	50.9389
Total		20.5711	1.2157	0.0000	50.9640

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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Breakers Hotel (1806-19) - South Coast AQMD Air District, Annual

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
----------------	--------	----------------	-----------------	---------------	-----------

User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

Appendix A. California Coastal Premium Analysis: Hotel Inventories and Maps

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A1. Introduction

Appendix A presents the hotel inventories and maps for the California coastal premium analysis performed in Chapter 5. The two inventories studied for this analysis are shown in Table A1.

Table A1. Inventories for California Coastal Premium Analysis

Political	Distance From Coast	Hotel Count
California Coastal Counties	Coastal Zone	228
California Coastal Counties	Five-Mile Zone	471

As explained in Chapter 5, the hotels in these inventories participate STR surveys, are located in the Coastal Zone or Five-Mile Zone, and are AAA-rated.

The 471 hotels in the California Coastal Counties – Five-Mile Zone inventory also serve as the master list for unique hotels used for data analysis. Some of these hotels will also appear in the CCC inventories presented in Appendix B for the CCC local costs analysis. For cross-references purposes, each hotel is assigned a unique identification number (ID) from 000 to 471.

A2. Hotel Inventories

Tables A2 through A16 list the hotels for the California coastal premium inventories. The tables are organized by county from north (Del Norte County) to south (San Diego County). To avoid redundancy in presentation, each hotel is listed only once. Each table includes the AAA-rated hotels in the respective county's Five-Mile Zone. The hotels in each table are divided into two groups:

- Hotels in the Coastal Zone, and
- Hotels outside the Coastal Zone, but inside the Five-Mile Zone.

The Coastal Zone inventory consists only of the hotels listed in the first group. The Five-Mile Zone inventory consists of hotels listed in both groups.

Each county's table is ordered by zone (the two groups described above, city, then zip code). The ID is the hotel's unique number from unique 000 to 471. The list number (No.) is the hotel's position on the list under the group heading – to the table, but not across all inventories.

Table A2. Del Norte County Hotel Inventory (3 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (2 hotels)										
1	001	Del Norte	CZ	Best Western Northwoods Inn	655 Us Highway 101 S	Crescent City	95531	41.7514440	-124.1810860	3
2	002	Del Norte	CZ	Holiday Inn Express Klamath Redwood National Park Area	171 Klamath Blvd.	Klamath	95548	41.5295460	-124.0391740	3
Outside Coastal Zone, Inside Five-Mile Zone (1 hotel)										
1	003	Del Norte	FZ	Econo Lodge Crescent City	725 U.S. 101	Crescent City	95531	41.7645970	-124.1939860	2

Table A3. Humboldt County Hotel Inventory (13 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (4 hotels)										
1	004	Humboldt	CZ	Quality Inn Arcata	3535 Janes Rd	Arcata	95521	40.8996989	-124.0917945	2
2	005	Humboldt	CZ	Red Lion Hotel Eureka	1929 4th St	Eureka	95501	40.8050930	-124.1504390	3
3	006	Humboldt	CZ	Clarion Hotel Eureka	2223 4th St	Eureka	95501	40.8050910	-124.1476780	3
4	007	Humboldt	CZ	Rodeway Inn Eureka	2014 4th St	Eureka	95501	40.8045392	-124.1495697	2
Outside Coastal Zone, Inside Five-Mile Zone (9 hotels)										
1	008	Humboldt	FZ	Best Western Arcata Inn	4827 Valley West Boulevard	Arcata	95521	40.9021330	-124.0837640	2
2	009	Humboldt	FZ	Days Inn & Suites Arcata	4701 Valley W Blvd	Arcata	95521	40.9014160	-124.0837460	2
3	010	Humboldt	FZ	Howard Johnson Express Arcata	4700 Valley W Blvd	Arcata	95521	40.9012285	-124.0830202	2
4	011	Humboldt	FZ	Hampton Inn & Suites	4750 Valley West Blvd	Arcata	95524	40.9020725	-124.0834611	3
5	012	Humboldt	FZ	Best Western Humboldt Bay Inn	232 W 5th St	Eureka	95501	40.8008480	-124.1745190	3
6	013	Humboldt	FZ	Quality Inn Eureka	1209 4th St	Eureka	95501	40.8039627	-124.1581471	2
7	014	Humboldt	FZ	Days Inn Eureka	270 5th St	Eureka	95501	40.8013550	-124.1673240	2
8	015	Humboldt	FZ	Comfort Inn Humboldt Bay Eureka	4260 Broadway St	Eureka	95503	40.7709312	-124.1911795	3
9	016	Humboldt	FZ	Holiday Inn Express & Suites Arcata Eureka Airport	3107 Concorde Dr	McKinley ville	95519	40.9680660	-124.1107190	3

Table A4. Mendocino County Hotel Inventory (3 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (2 hotels)										
1	017	Mendocino	CZ	Super 8 Fort Bragg	888 S Main St	Fort Bragg	95437	39.4302090	-123.8058070	2
2	018	Mendocino	CZ	Holiday Inn Express Fort Bragg	250 Highway 20	Fort Bragg	95437	39.4192230	-123.8041220	3
Outside Coastal Zone, Inside Five-Mile Zone (1 hotel)										
1	019	Mendocino	FZ	Best Western Vista Manor Lodge	1100 N Main St	Fort Bragg	95437	39.4578960	-123.8051280	2

Table A5. Sonoma County Hotel Inventory (1 hotel)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (1 hotel)										
1	020	Sonoma	CZ	Bodega Bay Lodge & Spa	103 California 1	Bodega Bay	94293	38.3179580	-123.0327720	4

Table A6. Marin County Hotel Inventory (5 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Outside Coastal Zone, Inside Five-Mile Zone (5 hotels)										
1	021	Marin	FZ	Holiday Inn Express Mill Valley San Francisco Area	160 Shoreline Hwy	Mill Valley	94941	37.8818990	-122.5188900	3
2	022	Marin	FZ	Mill Valley Inn	165 Throckmorton Ave	Mill Valley	94941	37.9053488	-122.5493906	3
3	023	Marin	FZ	Acqua Hotel	555 Redwood Hwy	Mill Valley	94941	37.8879120	-122.5174529	3
4	024	Marin	FZ	Inn Above Tide	30 El Portal	Sausalito	94965	37.8556180	-122.4785780	3
5	025	Marin	FZ	Lodge @ Tiburon	1651 Tiburon Blvd	Southeast Marin	94920	37.8748700	-122.4575720	3

Table A7. San Francisco County Hotel Inventory (10 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Outside Coastal Zone, Inside Five-Mile Zone (10 hotels)										
1	026	San Francisco	FZ	Joie De Vivre Hotel Tomo	1800 Sutter St	San Francisco	94115	37.7868070	-122.4302290	2
2	027	San Francisco	FZ	Joie De Vivre Hotel Kabuki	1625 Post St	San Francisco	94115	37.7855970	-122.4285180	3
3	028	San Francisco	FZ	Hotel Drisco	2901 Pacific Avenue	San Francisco	94115	37.7920711	-122.4430521	3
4	029	San Francisco	FZ	Joie De Vivre Laurel Inn	444 Presidio Ave	San Francisco	94115	37.7873790	-122.4467220	3
5	030	San Francisco	FZ	La Luna Inn	2599 Lombard St	San Francisco	94123	37.7986020	-122.4434630	2
6	031	San Francisco	FZ	Travelodge San Francisco @ Presidio	2755 Lombard St	San Francisco	94123	37.7983200	-122.4466890	2
7	032	San Francisco	FZ	Howard Johnson San Francisco Marina District	1940 Lombard St	San Francisco	94123	37.8005220	-122.4335110	2
8	033	San Francisco	FZ	Country Hearth Inn San Francisco	2707 Lombard St	San Francisco	94123	37.7984970	-122.4461870	2
9	034	San Francisco	FZ	Comfort Inn by the Bay San Francisco	2775 Van Ness Ave	San Francisco	94920	37.8010390	-122.4252260	2
10	035	San Francisco	FZ	Hotel Del Sol	3100 Webster St	San Francisco	94920	37.8000892	-122.4335458	3

Table A8. San Mateo County Hotel Inventory (8 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (7 hotels)										
1	036	San Mateo	CZ	Half Moon Bay Lodge	2400 Cabrillo Hwy S	Half Moon Bay	94019	37.4332270	-122.4275422	3
2	037	San Mateo	CZ	Beach House Inn & Conference Center	4100 Cabrillo Hwy N	Half Moon Bay	94019	37.5019149	-122.4741380	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
3	038	San Mateo	CZ	Ritz Carlton Half Moon Bay	1 Miramontes Point Rd	Half Moon Bay	94019	37.4338745	-122.4412107	4
4	039	San Mateo	CZ	Comfort Inn Half Moon Bay	2930 Cabrillo Hwy N	Half Moon Bay	94019	37.4919150	-122.4528230	3
5	040	San Mateo	CZ	Mill Rose Inn	615 Mill St	Half Moon Bay	94019	37.4651060	-122.4306240	4
6	041	San Mateo	CZ	Best Western Lighthouse Hotel	105 Rockaway Beach Ave	Pacifica	94044	37.6097270	-122.4963730	3
7	042	San Mateo	CZ	Holiday Inn Express Hotel & Suites Pacifica	519 Nick Gust Way	Pacifica	94044	37.6086839	-122.4964540	3
Outside Coastal Zone, Inside Five-Mile Zone (1 hotel)										
1	043	San Mateo	FZ	Hampton Inn	2700 Junipero Serra Blvd	Daly City	94920	37.6907710	-122.4714007	3

Table A9. Santa Cruz County Hotel Inventory (20 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (7 hotels)										
1	044	Santa Cruz	CZ	Seascape Beach Resort & Conference Center	1 Seascape Resort Dr	Aptos	95003	36.9507063	-121.8769390	4
2	045	Santa Cruz	CZ	Best Western Capitola By Sea	1435 41st Ave	Capitola	95010	36.9711439	-121.9654405	3
3	046	Santa Cruz	CZ	Fairfield Inn & Suites Santa Cruz Capitola	1255 41st Ave	Capitola	95010	36.9697890	-121.9655280	3
4	047	Santa Cruz	CZ	Super 8 Santa Cruz Beach Boardwalk W	321 Riverside Ave	Santa Cruz	95060	36.9666260	-122.0184830	2
5	048	Santa Cruz	CZ	Howard Johnson Inn Santa Cruz	130 West Cliff Drive	Santa Cruz	95060	36.9635655	-122.0251252	2
6	049	Santa Cruz	CZ	Super 8 Santa Cruz Beach Boardwalk E	338 Riverside Ave	Santa Cruz	95060	36.9673810	-122.0183730	2
7	050	Santa Cruz	CZ	Comfort Inn Beach Boardwalk	314 Riverside Ave	Santa Cruz	95060	36.9670190	-122.0182190	2
Outside Coastal Zone, Inside Five-Mile Zone (13 hotels)										
1	051	Santa Cruz	FZ	Best Western Seacliff Inn	7500 Old Dominion Ct	Aptos	95003	36.9791273	-121.9101238	3
2	052	Santa Cruz	FZ	Quality Inn & Suites Capitola By The Sea	720 Hill St	Capitola	95010	36.9826730	-121.9541880	2
3	053	Santa Cruz	FZ	The Hotel Paradox	611 Ocean St	Santa Cruz	95060	36.9768350	-122.0207540	3
4	054	Santa Cruz	FZ	Best Western Inn	126 Plymouth St	Santa Cruz	95060	36.9852822	-122.0229238	2
5	055	Santa Cruz	FZ	Ramada Limited	516 Water Street	Santa Cruz	95060	36.9799269	-122.0198164	2
6	056	Santa Cruz	FZ	Quality Inn Santa Cruz	1101 Ocean Street	Santa Cruz	95060	36.9817650	-122.0230130	2
7	057	Santa Cruz	FZ	Inn at Pasatiempo	555 California 17	Santa Cruz	95060	37.0003460	-122.0225110	3
8	058	Santa Cruz	FZ	Comfort Inn Santa Cruz	110 Plymouth Street	Santa Cruz	95060	36.9849663	-122.0229617	2
9	059	Santa Cruz	FZ	Best Western All Suite Inn	500 Ocean St	Santa Cruz	95060	36.9750720	-122.0185810	3
10	060	Santa Cruz	FZ	Hampton Inn	1505 Ocean Street	Santa Cruz	95060	36.9847574	-122.0239284	3
11	061	Santa Cruz	FZ	Holiday Inn Express Hotel & Suites Santa Cruz East	1410 Ocean Street	Santa Cruz	95060	36.9842954	-122.0228059	3
12	062	Santa Cruz	FZ	Chaminade	1 Chaminade Lane	Santa Cruz	95065	36.9981850	-121.9849720	4
13	063	Santa Cruz	FZ	Holiday Inn Express & Suites Watsonville	1855 Main St	Watsonville	95076	36.9167970	-121.7807160	3

Table A10. Monterey County Hotel Inventory (52 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (26 hotels)										
1	064	Monterey	CZ	Joie De Vivre Ventana Inn	48123 California 1	Big Sur	93920	36.2281900	-121.7604380	4
2	065	Monterey	CZ	Dolphin Inn	San Carlos St	Carmel	93921	36.5583320	-121.9217230	2
3	066	Monterey	CZ	Svendsgaard's Inn	San Carlos St & 4th Ave	Carmel	93921	36.5582880	-121.9221460	3
4	067	Monterey	CZ	Wayside Inn	Mission St	Carmel	93921	36.5535440	-121.9207090	3
5	068	Monterey	CZ	Pine Inn	Monte Verde St Ocean Ave between Lincoln St	Carmel	93921	36.5553890	-121.9240370	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
6	069	Monterey	CZ	Candle Light Inn	San Carlos between 4th & 5th Avenue	Carmel	93921	36.5574850	-121.9222540	2
7	070	Monterey	CZ	Best Western Carmel's Town House Lodge	Corner of San Carlos St and Fifth Ave	Carmel	93923	36.5572230	-121.9219580	3
8	071	Monterey	CZ	Carriage House Inn	Junipero between 7th & 8th Avenue	Carmel	93923	36.5528970	-121.9202930	4
9	072	Monterey	CZ	Colonial Terrace Inn	San Antonio Ave & 13th Ave	Carmel	93923	36.5463837	-121.9278189	3
10	073	Monterey	CZ	Tickle Pink Inn	155 Highland Dr	Carmel	93923	36.5003840	-121.9367160	4
11	074	Monterey	CZ	Hyatt Carmel Highlands	120 Highlands Dr	Carmel	93923	36.5019220	-121.9374880	4
12	075	Monterey	CZ	Best Western Beach Dunes Inn	3290 Dunes Dr	Marina	93933	36.7003150	-121.8045397	2
13	076	Monterey	CZ	Quality Inn Monterey Beach Dunes Marina	3280 Dunes Dr	Marina	93933	36.6993700	-121.8050120	1
14	077	Monterey	CZ	Sanctuary Beach Resort	3295 Dunes Rd	Marina	93933	36.6996160	-121.8054840	3
15	078	Monterey	CZ	Holiday Inn Express & Suites Marina	189 Seaside Ave	Marina	93933	36.6922950	-121.8021240	3
16	079	Monterey	CZ	Monterey Plaza Hotel & Spa	400 Cannery Row	Monterey	93922	36.6125760	-121.8979420	4
17	080	Monterey	CZ	Best Western Beach Resort Mont	2600 Sand Dunes Dr	Monterey	93940	36.6108690	-121.8583920	3
18	081	Monterey	CZ	Spindrift Inn	652 Cannery Row	Monterey	93940	36.6154690	-121.8996480	3
19	082	Monterey	CZ	Portola Hotel & Spa @ Monterey	2 Portola Plaza	Monterey	93940	36.6016370	-121.8944290	4
20	083	Monterey	CZ	Monterey Bay Inn	242 Cannery Row	Monterey	93940	36.6110370	-121.8970360	3
21	084	Monterey	CZ	La Quinta Inns & Suites Monterey	2401 Del Monte Ave	Monterey	93940	36.6057810	-121.8602210	2
22	085	Monterey	CZ	Hotel Pacific	300 Pacific St	Monterey	93940	36.6021600	-121.8956940	3
23	086	Monterey	CZ	InterContinental The Clement Monterey	750 Cannery Row	Monterey	93940	36.6168180	-121.9007230	4
24	087	Monterey	CZ	Asilomar Conference Grounds	800 Asilomar Ave	Pacific Grove	93950	36.6192274	-121.9357301	2
25	088	Monterey	CZ	Martine Inn	255 Ocean View Blvd	Pacific Grove	93950	36.6205930	-121.9085970	3
26	089	Monterey	CZ	Green Gables Inn	301 Ocean View Blvd	Pacific Grove	93950	36.6206650	-121.9094480	3
Outside Coastal Zone, Inside Five-Mile Zone (26 hotels)										
1	090	Monterey	FZ	Carmel Mission Inn	3665 Rio Rd	Carmel	93923	36.5398040	-121.9084170	3
2	091	Monterey	FZ	Ramada Marina	323 Reservation Rd	Marina	93933	36.6835390	-121.7903750	3
3	092	Monterey	FZ	Marriott Monterey	350 Calle Principal	Monterey	93940	36.6005840	-121.8953040	4
4	093	Monterey	FZ	Best Western De Anza Inn	2141 Fremont St	Monterey	93940	36.5967810	-121.8609540	3
5	094	Monterey	FZ	Best Western Monterey Inn	825 Abrego St	Monterey	93940	36.5940224	-121.8921753	3
6	095	Monterey	FZ	Best Western Park Crest Motel	1100 Munras Ave	Monterey	93940	36.5905910	-121.8966660	3
7	096	Monterey	FZ	Super 8 Monterey Munras Area	1300 Munras Ave	Monterey	93940	36.5857380	-121.9008150	2
8	097	Monterey	FZ	Best Western Plus Victorian Inn	487 Foam St	Monterey	93940	36.6127450	-121.9003110	3
9	098	Monterey	FZ	Comfort Inn Monterey By The Sea	1252 Munras Ave	Monterey	93940	36.5877400	-121.8996120	2
10	099	Monterey	FZ	Comfort Inn Monterey Bay	2050 N Fremont St	Monterey	93940	36.5955480	-121.8643580	2
11	100	Monterey	FZ	Hyatt Regency Monterey	1 Old Golf Course Rd	Monterey	93940	36.5927200	-121.8769352	3
12	101	Monterey	FZ	Hilton Garden Inn Monterey	1000 Aguajito Rd	Monterey	93940	36.5911130	-121.8822530	3
13	102	Monterey	FZ	The Casa Munras	700 Munras Ave	Monterey	93940	36.5954510	-121.8932570	3
14	103	Monterey	FZ	Ramada Limited Monterey North	2058 N Fremont St	Monterey	93940	36.5956740	-121.8640260	2
15	104	Monterey	FZ	Clarion Monterey	1046 Munras Ave	Monterey	93940	36.5911700	-121.8958910	3
16	105	Monterey	FZ	Hotel Abrego	755 Abrego St	Monterey	93940	36.5943860	-121.8918190	3
17	106	Monterey	FZ	Mariposa Inn	1386 Munras Ave	Monterey	93940	36.5840660	-121.9022210	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
18	107	Monterey	FZ	Days Inn Monterey Carmel	1288 Munras Ave	Monterey	93940	36.5866000	-121.9001540	2
19	108	Monterey	FZ	Vagabond Inn Monterey	1010 Munras Ave	Monterey	93940	36.5915390	-121.8953240	2
20	109	Monterey	FZ	Days Inn Monterey	850 Abrego St	Monterey	93940	36.5936630	-121.8927720	2
21	110	Monterey	FZ	Quality Inn Monterey	2075 Fremont St	Monterey	93940	36.5964850	-121.8639590	3
22	111	Monterey	FZ	Comfort Inn Monterey Peninsula Airport	1200 Olmsted Rd	Monterey	93940	36.5846010	-121.8503720	3
23	112	Monterey	FZ	Holiday Inn Express Monterey Cannery Row	443 Wave St	Monterey	93940	36.6124490	-121.8992120	3
24	113	Monterey	FZ	Ramada Limited Monterey Carmel	1182 Cass St	Monterey	93940	36.5892570	-121.8979970	2
25	114	Monterey	FZ	Gosby House Inn	643 Lighthouse Ave	Pacific Grove	93950	36.6216660	-121.9194670	3
26	115	Monterey	FZ	Howard Johnson Express Monterey Pacific Grove / BEST WESTERN The Inn & Suites Pacific Grove	660 Dennett St	Pacific Grove	93950	36.6199860	-121.9331910	2

Table A11. San Luis Obispo County Hotel Inventory (37 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (34 hotels)										
1	116	San Luis Obispo	CZ	Avila Lighthouse Suites	550 Front St	Avila Beach	93424	35.1794080	-120.7354469	3
2	117	San Luis Obispo	CZ	Castle Inn by the Sea	6620 Moonstone Beach Dr	Cambria	93428	35.5784520	-121.1152320	2
3	118	San Luis Obispo	CZ	San Simeon Pines Seaside Resort	7200 Moonstone Beach Dr	Cambria	93428	35.5831810	-121.1198010	2
4	119	San Luis Obispo	CZ	Fogcatcher Inn	6400 Moonstone Beach Dr	Cambria	93428	35.5759730	-121.1129980	3
5	120	San Luis Obispo	CZ	Sand Pebbles Inn	6252 Moonstone Beach Dr	Cambria	93428	35.5736830	-121.1123150	3
6	121	San Luis Obispo	CZ	Blue Dolphin Inn	6470 Moonstone Beach Dr	Cambria	93428	35.5767140	-121.1135340	3
7	122	San Luis Obispo	CZ	Pelican Cove Inn	6316 Moonstone Beach Dr	Cambria	93428	35.5745590	-121.1123610	3
8	123	San Luis Obispo	CZ	White Water Inn	6790 Moonstone Beach Dr	Cambria	93428	35.5804240	-121.1171290	2
9	124	San Luis Obispo	CZ	Econo Lodge Morro Bay	1100 Main St	Morro Bay	93422	35.3691040	-120.8496860	2
10	125	San Luis Obispo	CZ	Comfort Inn Downtown Morro Bay	590 Morro Ave	Morro Bay	93422	35.3638350	-120.8508380	3
11	126	San Luis Obispo	CZ	Ascend Collection Hotel Ascot Suites	260 Morro Bay Blvd	Morro Bay	93422	35.3656260	-120.8506470	3
12	127	San Luis Obispo	CZ	Best Western El Rancho	2460 Main St	Morro Bay	93442	35.3872480	-120.8573190	3
13	128	San Luis Obispo	CZ	Best Western San Marcos Inn	250 Pacific St	Morro Bay	93442	35.3646660	-120.8507530	3
14	129	San Luis Obispo	CZ	Best Western Tradewinds	225 Beach St	Morro Bay	93442	35.3690280	-120.8526310	2
15	130	San Luis Obispo	CZ	Days Inn Morro Bay	1095 Main St	Morro Bay	93442	35.3681486	-120.8501788	2
16	131	San Luis Obispo	CZ	Inn at Morro Bay	60 State Park Rd	Morro Bay	93442	35.3531640	-120.8437620	3
17	132	San Luis Obispo	CZ	Sundown Motel	640 Main St	Morro Bay	93442	35.3643748	-120.8498364	2
18	133	San Luis Obispo	CZ	Blue Sail Inn	851 Market Ave	Morro Bay	93442	35.3664700	-120.8526500	2
19	134	San Luis Obispo	CZ	Embarcadero Inn	456 Embarcadero	Morro Bay	93442	35.3619406	-120.8520309	3
20	135	San Luis Obispo	CZ	Best Western Shore Cliff Lodge	2555 Price St	Pismo Beach	93449	35.1512260	-120.6579720	3
21	136	San Luis Obispo	CZ	Seacrest Resort	2241 Price St	Pismo Beach	93449	35.1479010	-120.6495680	3
22	137	San Luis Obispo	CZ	Edgewater Motel Incorporated	280 Wadsworth Ave	Pismo Beach	93449	35.1429586	-120.6436127	2
23	138	San Luis Obispo	CZ	Cottage Inn by the Sea	2351 Price St	Pismo Beach	93449	35.1487400	-120.6504820	3
24	139	San Luis Obispo	CZ	Seaventure Resort	100 Ocean View Ave	Pismo Beach	93449	35.1367130	-120.6410440	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
25	140	San Luis Obispo	CZ	Spyglass Inn	2705 Spyglass Dr	Pismo Beach	93449	35.1631600	-120.6882770	3
26	141	San Luis Obispo	CZ	Best Western Shelter Cove Lodg	2651 Price St	Pismo Beach	93449	35.1500953	-120.6541509	3
27	142	San Luis Obispo	CZ	The Cliffs Resort	2757 Shell Beach Rd	Pismo Beach	93449	35.1653380	-120.6907690	3
28	143	San Luis Obispo	CZ	Oxford Suites Pismo Beach	651 5 Cities Dr	Pismo Beach	93449	35.1354074	-120.6212551	3
29	144	San Luis Obispo	CZ	Sandcastle Inn	100 Stimson Ave	Pismo Beach	93449	35.1378153	-120.6415751	3
30	145	San Luis Obispo	CZ	Pismo Lighthouse Suites	2411 Price St	Pismo Beach	93449	35.1493503	-120.6513377	3
31	146	San Luis Obispo	CZ	Hilton Garden Inn San Luis Obispo Pismo Beach	601 James Way	Pismo Beach	93449	35.1369090	-120.6206820	3
32	147	San Luis Obispo	CZ	Best Western Cavalier Oceanfro	9415 Hearst Drive	San Simeon	93452	35.6142060	-121.1464680	3
33	148	San Luis Obispo	CZ	Quality Inn San Simeon	9260 Castillo Dr	San Simeon	93452	35.6129480	-121.1433300	2
34	149	San Luis Obispo	CZ	The Morgan San Simeon	9135 Hearst Dr	San Simeon	93452	35.6110350	-121.1431010	3
Outside Coastal Zone, Inside Five-Mile Zone (3 hotels)										
1	150	San Luis Obispo	FZ	BEST WESTERN Casa Grande Inn	850 Oak Park Blvd	Arroyo Grande	93420	35.1318895	-120.6057191	3
2	151	San Luis Obispo	FZ	Hampton Inn	1400 W Branch St	Arroyo Grande	93420	35.1293219	-120.6016334	3
3	152	San Luis Obispo	FZ	Holiday Inn Express Hotel Grover Beach-Pismo Beach Area	775 N Oak Park Blvd	Grover Beach	93433	35.1296640	-120.6082260	3

Table A12. Santa Barbara County Hotel Inventory (22 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (8 hotels)										
1	153	Santa Barbara	CZ	Best Western Carpinteria Inn	4558 Carpinteria Ave	Carpinteria	93013	34.4023260	-119.5258980	3
2	154	Santa Barbara	CZ	Holiday Inn Express & Suites Carpinteria	5606 Carpinteria Ave	Carpinteria	93013	34.3925390	-119.5094940	3
3	155	Santa Barbara	CZ	Inn By The Harbor	433 W Montecito St	Santa Barbara	93101	34.4096390	-119.6981720	3
4	156	Santa Barbara	CZ	Brisas del Mar	223 Castillo St	Santa Barbara	93101	34.4098850	-119.6972910	3
5	157	Santa Barbara	CZ	Coast Hotel West Beach Inn	306 W Cabrillo Blvd	Santa Barbara	93101	34.4089540	-119.6933520	3
6	158	Santa Barbara	CZ	Lavender Inn By The Sea	206 Castillo St	Santa Barbara	93101	34.4103670	-119.6965110	3
7	159	Santa Barbara	CZ	Hyatt Regency Santa Barbara	1111 E Cabrillo Blvd	Santa Barbara	93103	34.4174520	-119.6706680	3
8	160	Santa Barbara	CZ	Doubletree Fess Parkers Resort	633 E Cabrillo Blvd	Santa Barbara	93103	34.4165080	-119.6769200	4
Outside Coastal Zone, Inside Five-Mile Zone (14 hotels)										
1	161	Santa Barbara	FZ	Hotel Goleta	5650 Calle Real Goleta	Goleta	93117	34.4417180	-119.8209820	3
2	162	Santa Barbara	FZ	Best Western South Coast Inn	5620 Calle Real	Goleta	93117	34.4411841	-119.8199626	3
3	163	Santa Barbara	FZ	Hampton Inn Santa Barbara Goleta	5665 Hollister Ave	Goleta	93117	34.4352780	-119.8223280	3
4	164	Santa Barbara	FZ	The Upham Hotel Country Hous	1404 De La Vina St	Santa Barbara	93013	34.4232491	-119.7093854	3
5	165	Santa Barbara	FZ	Best Western Beachside Inn	336 W Cabrillo Blvd	Santa Barbara	93101	34.4085565	-119.6935275	2
6	166	Santa Barbara	FZ	La Quinta Inns & Suites Santa Barbara	1601 State St	Santa Barbara	93101	34.4270100	-119.7101030	2
7	167	Santa Barbara	FZ	Holiday Inn Express Virginia Santa Barbara	17 W Haley St	Santa Barbara	93101	34.4162150	-119.6959710	3
8	168	Santa Barbara	FZ	Simpson House Inn	121 E Arrellaga St	Santa Barbara	93101	34.4290610	-119.7080340	4
9	169	Santa Barbara	FZ	Best Western Encina Lodge And Suites	2220 Bath St	Santa Barbara	93105	34.4302880	-119.7209350	3
10	170	Santa Barbara	FZ	Best Western Plus Pepper Tree Inn	3850 State St	Santa Barbara	93105	34.4407480	-119.7487010	3
11	171	Santa Barbara	FZ	Quality Inn Santa Barbara	3055 De La Vina St	Santa Barbara	93105	34.4399950	-119.7299970	2
12	172	Santa Barbara	FZ	Ramada Limited Santa Barbara	4770 Calle Real	Santa Barbara	93110	34.4440200	-119.7875910	3
13	173	Santa Barbara	FZ	Pacifica Suites	5490 Hollister Ave	Santa Barbara	93111	34.4358180	-119.8159270	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
14	174	Santa Barbara	FZ	Extended Stay America Santa Barbara Calle Real	4870 Calle Real	Santa Barbara	93111	34.4434260	-119.7915120	2

Table A13. Ventura County Hotel Inventory (14 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (11 hotels)										
1	175	Ventura	CZ	Embassy Suites Mandalay Beach Hotel & Resort	2101 Mandalay Beach Rd	Oxnard	93035	34.1788930	-119.2360140	3
2	176	Ventura	CZ	Hampton Inn Channel Islands Harbor	3231 Peninsula Rd	Oxnard	93035	34.1705930	-119.2257460	3
3	177	Ventura	CZ	Holiday Inn Express Port Hueneme	350 E Port Hueneme Rd	Port Hueneme	93041	34.1469870	-119.1964920	3
4	178	Ventura	CZ	Crowne Plaza Ventura Beach	450 E Harbor Blvd	Ventura	93001	34.2764930	-119.2934460	3
5	179	Ventura	CZ	Best Western Inn of Ventura	708 East Thompson	Ventura	93001	34.2776260	-119.2896640	3
6	180	Ventura	CZ	Marriott Ventura Beach	2055 E Harbor Blvd	Ventura	93001	34.2682320	-119.2745280	3
7	181	Ventura	CZ	Vagabond Inn Ventura	756 E Thompson Blvd	Ventura	93001	34.2776460	-119.2893680	2
8	182	Ventura	CZ	Country Inn & Suites Ventura	298 S Chestnut St	Ventura	93001	34.2774980	-119.2906610	3
9	183	Ventura	CZ	Four Points Ventura Harbor Resort	1050 Schooner Dr	Ventura	93001	34.2479430	-119.2592630	3
10	184	Ventura	CZ	Comfort Inn Ventura Beach	2094 E Harbor Blvd	Ventura	93001	34.2680110	-119.2727820	3
11	185	Ventura	CZ	Holiday Inn Express & Suites Ventura Harbor	1080 Navigator Dr	Ventura	93001	34.2463930	-119.2582590	3
Outside Coastal Zone, Inside Five-Mile Zone (3 hotels)										
1	186	Ventura	FZ	Best Western Oxnard Inn	1156 S Oxnard Blvd	Oxnard	93030	34.1884617	-119.1758428	3
2	187	Ventura	FZ	Residence Inn Oxnard River Ridge	2101 W Vineyard Ave	Oxnard	93030	34.2302260	-119.1989960	3
3	188	Ventura	FZ	Ramada Oxnard	1001 E Channel Islands Blvd	Oxnard	93033	34.1739830	-119.1665850	2

Table A14. Los Angeles County Hotel Inventory (101 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (27 hotels)										
1	189	Los Angeles	CZ	Beach House Hotel Hermosa Beach	1300 The Strand	Hermosa Beach	90254	33.8626163	-118.4019475	3
2	190	Los Angeles	CZ	Hyatt Regency Long Beach	200 S Pine Ave	Long Beach	90802	33.7635248	-118.1914638	4
3	191	Los Angeles	CZ	RI Long Beach Downtown	600 Queensway Dr	Long Beach	90802	33.7587510	-118.2013113	3
4	192	Los Angeles	CZ	Best Western Golden Sails Htl	6285 E Pacific Coast Hwy	Long Beach	90803	33.7656980	-118.1156440	2
5	193	Los Angeles	CZ	Doubletree Hotel Maya	700 Queensway Dr	Long Beach	90802	33.7571330	-118.1985300	3
6	194	Los Angeles	CZ	Hyatt The Pike Long Beach	285 Bay St	Long Beach	90802	33.7649970	-118.1946570	3
7	195	Los Angeles	CZ	The Inn at Venice Beach	327 Washington Blvd	Marina Del Rey	90292	33.9808303	-118.4641381	3
8	196	Los Angeles	CZ	Marina Del Rey Marriott	4100 Admiralty Way	Marina Del Rey	90292	33.9820510	-118.4595250	3
9	197	Los Angeles	CZ	The Ritz Carlton, Marina Del Rey	4375 Admiralty Way	Marina Del Rey	90292	33.9847217	-118.4505725	5
10	198	Los Angeles	CZ	DoubleTree Hotel MDR Marina Del Rey	13480 Maxella Ave	Marina Del Rey	90292	33.9851010	-118.4410280	3
11	199	Los Angeles	CZ	Hilton Garden Inn Marina Del Rey	4200 Admiralty Way	Marina Del Rey	90292	33.9836080	-118.4572140	3
12	200	Los Angeles	CZ	Terranea Resort	100 Terranea Way	Rancho Palos Verdes	90275	33.7384620	-118.3978690	4
13	201	Los Angeles	CZ	The Portofino Hotel and Yacht Club - A Noble House Hotel	260 Portofino Way	Redondo Beach	90277	33.8443997	-118.3966112	3
14	202	Los Angeles	CZ	Crowne Plaza Hotel Redondo Beach and Marina	300 N Harbor Dr	Redondo Beach	90277	33.8454585	-118.3928619	3
15	203	Los Angeles	CZ	Ramada Limited Redondo Beach	435 S Pacific Coast Hwy	Redondo Beach	90277	33.8353422	-118.3853403	2
16	204	Los Angeles	CZ	The Huntley Hotel	1111 2nd St	Santa Monica	90401	34.0187223	-118.5010592	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
17	205	Los Angeles	CZ	Viceroy Santa Monica	1819 Ocean Ave	Santa Monica	90401	34.0079333	-118.4907767	3
18	206	Los Angeles	CZ	Shangri-La Hotel	1301 Ocean Ave	Santa Monica	90401	34.0154272	-118.4993043	3
19	207	Los Angeles	CZ	Loews Santa Monica Beach Hotel	1700 Ocean Ave	Santa Monica	90401	34.0091184	-118.4930376	4
20	208	Los Angeles	CZ	JW Marriott Santa Monica Le Merigot	1740 Ocean Ave	Santa Monica	90401	34.0084910	-118.4924020	4
21	209	Los Angeles	CZ	Oceana Santa Monica	849 Ocean Ave	Santa Monica	90403	34.0213830	-118.5059580	3
22	210	Los Angeles	CZ	Wyndham Santa Monica Beach @ The Pier	120 Colorado Ave	Santa Monica	90401	34.0118320	-118.4941630	3
23	211	Los Angeles	CZ	Fairmont Miramar	101 Wilshire Blvd	Santa Monica	90401	34.0179160	-118.5016220	4
24	212	Los Angeles	CZ	Georgian Hotel	1415 Ocean Ave	Santa Monica	90401	34.0136710	-118.4973510	3
25	213	Los Angeles	CZ	Ocean View Hotel	1447 Ocean Ave	Santa Monica	90401	34.0131740	-118.4965600	2
26	214	Los Angeles	CZ	Shore Hotel	1515 Ocean Ave	Santa Monica	90401	34.0127100	-118.4956390	4
27	215	Los Angeles	CZ	Le Meridien Delfina Santa Monica	530 Pico Blvd	Santa Monica	90405	34.0107850	-118.4853660	4
Outside Coastal Zone, Inside Five-Mile Zone (74 hotels)										
1	216	Los Angeles	FZ	Four Points by Sheraton Los Angeles Westside	5990 Green Valley Cir	Culver City	90230	33.9838010	-118.3938540	3
2	217	Los Angeles	FZ	Travelodge Los Angeles Culver City	11180 Washington Pl	Culver City	90232	34.0089013	-118.4134370	2
3	218	Los Angeles	FZ	Doubletree by Hilton Hotel Los Angeles International Airport	1985 E Grand Ave	El Segundo	90245	33.9198460	-118.3920390	3
4	219	Los Angeles	FZ	Embassy Suites LAX South	1440 E Imperial Ave	El Segundo	90245	33.9305740	-118.4007440	3
5	220	Los Angeles	FZ	Courtyard by Marriott Los Angeles LAX El Segundo	2000 E Mariposa Ave	El Segundo	90245	33.9230480	-118.3914590	3
6	221	Los Angeles	FZ	Hilton Garden Inn LAX El Segundo	2100 E Mariposa Ave	El Segundo	90245	33.9230230	-118.3883270	3
7	222	Los Angeles	FZ	Residence Inn by Marriott El Segundo	2135 E El Segundo Blvd	El Segundo	90245	33.9166190	-118.3887580	3
8	223	Los Angeles	FZ	Extended Stay America Los Angeles LAX Airport El Segundo	1910 E Mariposa Ave	El Segundo	90245	33.9235690	-118.3946800	2
9	224	Los Angeles	FZ	Hyatt Place Los Angeles LAX El Segundo	750 N Nash St	El Segundo	90245	33.9262100	-118.3871810	3
10	225	Los Angeles	FZ	Springhill Suites by Marriott Manhattan Beach	14620 Aviation Blvd	Hawthorne	90250	33.8986850	-118.3780930	3
11	226	Los Angeles	FZ	Towneplace Suites by Marriott Los Angeles LAX/Manhattan Beach	14400 Aviation Blvd	Hawthorne	90260	33.9009600	-118.3780790	2
12	227	Los Angeles	FZ	Hampton Inn Los Angeles International Airport Hawthorne	11430 Acacia Ave	Hawthorne, CA	90250	33.9306680	-118.3506600	3
13	228	Los Angeles	FZ	Quality Inn & Suites Hermosa Beach	901 Aviation Blvd	Hermosa Beach	90254	33.8633567	-118.3911203	3
14	229	Los Angeles	FZ	Holiday Inn Express Hotel & Suites Hermosa Beach	125 Pacific Coast Hwy	Hermosa Beach	90254	33.8553203	-118.3906196	3
15	230	Los Angeles	FZ	Hampton Inn and Suites	1530 Pacific Coast Hwy	Hermosa Beach	90254	33.8658448	-118.3933275	3
16	231	Los Angeles	FZ	Wingate by Wyndham Los Angeles International Airport LAX	10300 S La Cienega Blvd	Inglewood	90304	33.9423811	-118.3699051	3
17	232	Los Angeles	FZ	Best Western South Bay Hotel	15000 Hawthorne Blvd	Lawndale	90260	33.8952471	-118.3522186	3
18	233	Los Angeles	FZ	Days Inn LAX Airport South Bay - Lawndale	15636 Hawthorne Blvd	Lawndale	90260	33.8886130	-118.3517860	2
19	234	Los Angeles	FZ	Renaissance Long Beach Hotel	111 E Ocean Blvd	Long Beach	90704	33.7593626	-118.2416893	3
20	235	Los Angeles	FZ	Holiday Inn Hotel Long Beach (Dwtn Area)	1133 Atlantic Ave	Long Beach	90704	33.7816303	-118.1851716	3
21	236	Los Angeles	FZ	Holiday Inn Hotel Long Beach-Airport (Conf Ctr)	2640 N Lakewood Blvd	Long Beach	90706	33.8034610	-118.1425580	3
22	237	Los Angeles	FZ	Comfort Inn & Suites Near Long Beach Conv Center	200 E Willow St	Long Beach	90706	33.8042468	-118.1908723	3
23	238	Los Angeles	FZ	Travelodge Long Beach Convention Center	80 Atlantic Ave	Long Beach	90802	33.7677371	-118.1850264	2
24	239	Los Angeles	FZ	Best Western of Long Beach	1725 Long Beach Blvd	Long Beach	90813	33.7887500	-118.1899050	2
25	240	Los Angeles	FZ	RI LONG BEACH	4111 E Willow St	Long Beach	90815	33.8035829	-118.1443800	3
26	241	Los Angeles	FZ	Marriott Long Beach Airport	4700 Airport Plaza Dr	Long Beach	90815	33.8115480	-118.1383780	3
27	242	Los Angeles	FZ	Extended Stay America Los Angeles - Long Beach Airport	4105 E Willow St	Long Beach	90815	33.8043260	-118.1463940	2
28	243	Los Angeles	FZ	Quality Inn Long Beach Airport	3201 E Pacific Coast Hwy	Long Beach	90755	33.7903280	-118.1543320	2
29	244	Los Angeles	FZ	Courtyard Long Beach Downtown	500 E 1st St	Long Beach	90802	33.7676010	-118.1856180	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
30	245	Los Angeles	FZ	Hotel Current	5325 Pacific Coast Hwy	Long Beach	90804	33.7814680	-118.1303120	3
31	246	Los Angeles	FZ	Holiday Inn Lax	9901 S La Cienega Blvd	Los Angeles	90045	33.9462250	-118.3711880	3
32	247	Los Angeles	FZ	Sheraton	6101 W Century Blvd	Los Angeles	90045	33.9465310	-118.3907800	3
33	248	Los Angeles	FZ	Crowne Plaza Hotel Los Angeles-Intl Airport	5985 W Century Blvd	Los Angeles	90045	33.9461664	-118.3888496	3
34	249	Los Angeles	FZ	La Quinta Inn & Suites Lax	5249 W Century Blvd	Los Angeles	90045	33.9455416	-118.3719777	3
35	250	Los Angeles	FZ	Radisson Hotel at Los Angeles Airport	6225 W Century Blvd	Los Angeles	90045	33.9458500	-118.3950740	3
36	251	Los Angeles	FZ	Four Points by Sheraton Los Angeles International Airport	9750 Airport Blvd	Los Angeles	90045	33.9476210	-118.3850643	3
37	252	Los Angeles	FZ	Embassy Suites LAX North	9801 Airport Blvd	Los Angeles	90045	33.9469520	-118.3865090	3
38	253	Los Angeles	FZ	Super8 - Los Angeles International Airport Hotel	9250 Airport Blvd	Los Angeles	90045	33.9517758	-118.3857294	2
39	254	Los Angeles	FZ	Renaissance Los Angeles Airport Hotel	9620 Airport Blvd	Los Angeles	90045	33.9491980	-118.3852390	3
40	255	Los Angeles	FZ	Courtyard by Marriott Los Angeles Century Boulevard	6161 W Century Blvd	Los Angeles	90045	33.9467100	-118.3934150	3
41	256	Los Angeles	FZ	Extended Stay America Los Angeles - LAX Airport	6531 S Sepulveda Blvd	Los Angeles	90045	33.9798020	-118.3952220	2
42	257	Los Angeles	FZ	Hotel Angeleno - A Joie De Vivre Hotel	170 N Church Ln	Los Angeles	90049	34.0736528	-118.4681940	3
43	258	Los Angeles	FZ	Best Western Royal Palace Inn	2528 S Sepulveda Blvd	Los Angeles	90064	34.0342872	-118.4333214	3
44	259	Los Angeles	FZ	Super 8 Los Angeles Culver City	12664 Washington Blvd	Los Angeles	90066	33.9968273	-118.4338681	2
45	260	Los Angeles	FZ	Rodeway Inn Culver City	11933 Washington Blvd	Los Angeles	90066	33.9979704	-118.4207488	2
46	261	Los Angeles	FZ	Luxe City Center Hotel	1020 S Figueroa St	Los Angeles	90704	33.7831215	-118.2803158	4
47	262	Los Angeles	FZ	Marriott Los Angeles Airport	5855 W Century Blvd	Los Angeles	90045	33.9466180	-118.3846890	3
48	263	Los Angeles	FZ	Hilton Los Angeles Airport	5711 W Century Blvd	Los Angeles	90045	33.9460270	-118.3816610	3
49	264	Los Angeles	FZ	Westin Los Angeles Airport	5400 W Century Blvd	Los Angeles	90045	33.9446220	-118.3741430	3
50	265	Los Angeles	FZ	Luxe Hotel Sunset Boulevard	11461 Sunset Blvd	Los Angeles	90049	34.0724580	-118.4683240	3
51	266	Los Angeles	FZ	Marriott Manhattan Beach	1400 Parkview Ave	Manhattan Beach	90266	33.9001180	-118.3882440	3
52	267	Los Angeles	FZ	Residence Inn-Lax	1700 N Sepulveda Blvd	Manhattan Beach	90266	33.8903210	-118.3958520	3
53	268	Los Angeles	FZ	Hawthorn Suites	1817 N Sepulveda Blvd	Manhattan Beach	90266	33.8920444	-118.3961056	3
54	269	Los Angeles	FZ	The Belamar Hotel	3501 N Sepulveda Blvd	Manhattan Beach	90266	33.9005810	-118.3967820	3
55	270	Los Angeles	FZ	Best Western Redondo Beach Inn	1850 S Pacific Coast Hwy	Redondo Beach	90277	33.8164670	-118.3790855	3
56	271	Los Angeles	FZ	Best Western Redondo Beach Gal	2740 Artesia Blvd	Redondo Beach	90278	33.8724200	-118.3597140	2
57	272	Los Angeles	FZ	Residence Inn Los Angeles Redondo Beach	2420 Marine Ave.	Redondo Beach, CA	90278	33.8929910	-118.3655320	3
58	273	Los Angeles	FZ	Hilton Garden Inn Los Angeles Redondo Beach	2410 Marine Ave.	Redondo Beach, CA	90278	33.8938200	-118.3665990	3
59	274	Los Angeles	FZ	Crowne Plaza Hotel Los Angeles Harbor Hotel	601 S Palos Verdes St	San Pedro	90704	33.7383010	-118.2820330	3
60	275	Los Angeles	FZ	Comfort Inn Near Santa Monica Pier	2815 Santa Monica Blvd	Santa Monica	90404	34.0351666	-118.4719971	2
61	276	Los Angeles	FZ	Best Western Gateway Hotel	1920 Santa Monica Blvd	Santa Monica	90404	34.0285234	-118.4800942	3
62	277	Los Angeles	FZ	Travelodge Santa Monica Pico Blvd	3102 Pico Blvd	Santa Monica	90405	34.0259460	-118.4571110	2
63	278	Los Angeles	FZ	Ambrose Hotel	1255 20th St	Santa Monica	91307	34.0303334	-118.4818477	3
64	279	Los Angeles	FZ	Doubletree Guest Suites Santa Monica	1707 4th St	Santa Monica	90401	34.0114610	-118.4889900	3
65	280	Los Angeles	FZ	Travelodge Torrance/Redondo Beach	2448 W Sepulveda Blvd	Torrance	90501	33.8210880	-118.3269700	2
66	281	Los Angeles	FZ	Courtyard by Marriott Torrance Palos Verdes	2633 W Sepulveda Blvd	Torrance	90501	33.8227010	-118.3314556	3
67	282	Los Angeles	FZ	Residence Inn	3701 Torrance Blvd	Torrance	90503	33.8387260	-118.3518580	3
68	283	Los Angeles	FZ	Marriott Torrance South Bay	3635 Fashion Way	Torrance	90503	33.8354160	-118.3501623	3
69	284	Los Angeles	FZ	Staybridge Suites	19901 Prairie Ave	Torrance	90503	33.8504000	-118.3460650	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
70	285	Los Angeles	FZ	Ramada Inn Torrance - South Bay	2880 Pacific Coast Hwy	Torrance	90505	33.7945960	-118.3378410	2
71	286	Los Angeles	FZ	Doubletree Torrance South Bay	21333 Hawthorne Blvd	Torrance	90503	33.8348300	-118.3542790	3
72	287	Los Angeles	FZ	Best Western Plus Avita Suites	3531 Torrance Blvd	Torrance	90503	33.8381180	-118.3480560	3
73	288	Los Angeles	FZ	Holiday Inn Express West Los Angeles	11250 Santa Monica Blvd	West Los Angeles	90025	34.0465740	-118.4473380	3
74	289	Los Angeles	FZ	BEST WESTERN Los Angeles Worldport Hotel	1402 W Pacific Coast Hwy	Wilmington	90803	33.7905820	-118.2830280	2

Table A15. Orange County Hotel Inventory (42 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (26 hotels)										
1	290	Orange	CZ	Ritz Carlton Laguna Niguel	1 Ritz Carlton Dr	Dana Point	92629	33.4765740	-117.7184310	5
2	291	Orange	CZ	Laguna Cliffs Resort	25135 Park Lantern	Dana Point	92629	33.4644157	-117.6914521	4
3	292	Orange	CZ	Best Western Plus Dana Point Inn By The Sea	34744 Coast Hwy	Dana Point	92624	33.4577300	-117.6705530	3
4	293	Orange	CZ	Doubletree Doheny Beach	34402 Pacific Coast Hwy	Dana Point	92629	33.4638270	-117.6816590	3
5	294	Orange	CZ	Best Western Plus Marina Shores Hotel	34280 Pacific Coast Hwy	Dana Point	92629	33.4658350	-117.6894270	3
6	295	Orange	CZ	St Regis Monarch Beach	1 Monarch Beach Resort N	Dana Point	92629	33.4822260	-117.7151730	5
7	296	Orange	CZ	BEST WESTERN Huntington Beach Inn	800 Pacific Coast Hwy	Huntington Beach	92648	33.6597944	-118.0052465	2
8	297	Orange	CZ	Hilton Waterfront Beach Resort	21100 Pacific Coast Hwy	Huntington Beach	92648	33.6532930	-117.9944030	4
9	298	Orange	CZ	Hyatt Regency Huntington Beach & Spa	21500 Pacific Coast Hwy	Huntington Beach	92648	33.6508470	-117.9903820	4
10	299	Orange	CZ	Best Western Laguna Brisas Spa	1600 S Coast Hwy	Laguna Beach	92651	33.5299868	-117.7724622	3
11	300	Orange	CZ	Surf and Sand Resort	1555 S Coast Hwy	Laguna Beach	92651	33.5303591	-117.7731664	4
12	301	Orange	CZ	Laguna Cliffs Inn	475 N Coast Hwy	Laguna Beach	92651	33.5448478	-117.7914419	3
13	302	Orange	CZ	Holiday Inn Laguna Beach	696 S Coast Hwy	Laguna Beach	92651	33.5380330	-117.7794000	3
14	303	Orange	CZ	Montage Laguna Beach	30801 S Coast Hwy	Laguna Beach	92651	33.5151530	-117.7570210	5
15	304	Orange	CZ	Hyatt Regency Newport Beach	1107 Jamboree Rd	Newport Beach	92660	33.6167331	-117.8879333	3
16	305	Orange	CZ	Newport Beach Marriott Bayview	500 Bayview Cir	Newport Beach	92660	33.6536018	-117.8681731	3
17	306	Orange	CZ	Newport Channel Inn	6030 West Coast Hwy	Newport Beach	92663	33.6258907	-117.9480626	2
18	307	Orange	CZ	Best Western Newport Beach Inn	6208 West Coast Hwy	Newport Beach	92663	33.6266580	-117.9493150	3
19	308	Orange	CZ	The Balboa Bay Club and Resort	1221 West Coast Hwy	Newport Beach	92663	33.6154726	-117.9143447	4
20	309	Orange	CZ	Bay Shores Peninsula Hotel	1800 W Balboa Blvd	Newport Beach	92663	33.6078950	-117.9251630	3
21	310	Orange	CZ	Pelican Hill Resort	22701 Pelican Hill Rd S	Newport Coast	92648	33.5868370	-117.8430420	5
22	311	Orange	CZ	Best Western Casablanca Inn	1601 N El Camino Real	San Clemente	92672	33.4328790	-117.6281340	2
23	312	Orange	CZ	Rodeway Inn San Clemente Beach	1301 N El Camino Real	San Clemente	92672	33.4322310	-117.6228010	2
24	313	Orange	CZ	Pacific Inn	600 Marina Dr	Seal Beach	90740	33.7449834	-118.1058175	3
25	314	Orange	CZ	Hampton Inn and Suites	2401 Seal Beach Blvd	Seal Beach	90740	33.7589180	-118.0814560	3
26	315	Orange	CZ	Best Western Harbour Inn & Suites	16912 Pacific Coast Hwy	Sunset Beach	90742	33.7164460	-118.0681290	3
Outside Coastal Zone, Inside Five-Mile Zone (16 hotels)										
1	316	Orange	FZ	Super 8 Costa Mesa Newport Beach	2645 Harbor Blvd	Costa Mesa	92626	33.6692910	-117.9201000	2
2	317	Orange	FZ	Best Western Newport Mesa Inn	2642 Newport Blvd	Costa Mesa	92627	33.6636840	-117.8954220	3
3	318	Orange	FZ	Travelodge Costa Mesa Newport Beach	1951 Costa Mesa Fwy	Costa Mesa	92627	33.6557417	-117.9050645	2
4	319	Orange	FZ	Ramada Inn and Suites Costa Mesa/Newport Beach	1680 Superior Ave	Costa Mesa	92627	33.6356133	-117.9240199	3
5	320	Orange	FZ	Holiday Inn Express Hotel & Suites Costa Mesa	2070 Costa Mesa Fwy	Costa Mesa	92627	33.6477301	-117.9124861	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
6	321	Orange	FZ	BLVD Hotel	2430 Newport Blvd	Costa Mesa	92627	33.6577080	-117.9015190	3
7	322	Orange	FZ	Best Western Regency Inn	19360 Beach Blvd	Huntington Beach	92646	33.6812045	-117.9885597	3
8	323	Orange	FZ	Howard Johnson Huntington Beach	17251 Beach Blvd	Huntington Beach	92647	33.7118820	-117.9894330	2
9	324	Orange	FZ	Comfort Suites Huntington Beach	16301 Beach Blvd	Huntington Beach	92647	33.7258490	-117.9894660	2
10	325	Orange	FZ	The Island Hotel	690 Newport Center Dr	Newport Beach	92660	33.6193350	-117.8756692	5
11	326	Orange	FZ	Holiday Inn Express San Clemente	35 Via Pico Plaza	San Clemente	92672	33.4353990	-117.6189420	3
12	327	Orange	FZ	Hampton Inn and Suites	2481 S El Camino Real	San Clemente	92672	33.4102600	-117.5998930	3
13	328	Orange	FZ	San Clemente Beach Travelodge	2441 S El Camino Real	San Clemente	92672	33.4108708	-117.6002653	2
14	329	Orange	FZ	Best Western Capistrano Inn	27174 Ortega Hwy	San Juan Capistrano	92675	33.5019800	-117.6564860	3
15	330	Orange	FZ	Residence Inn Dana Point San Juan Capistrano	33711 Camino Capistrano	San Juan Capistrano	92675	33.4732370	-117.6765260	3
16	331	Orange	FZ	Best Western Westminster Inn	5755 Westminster Blvd	Westminster	92683	33.7591023	-118.0286926	2

Table A16. San Diego County Hotel Inventory (140 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (73 hotels)										
1	332	San Diego	CZ	Holiday Inn Express Encinitas Cardiff Beach Area	1661 Villa Cardiff Dr	Cardiff By The Sea	92007	33.0275990	-117.2739410	3
2	333	San Diego	CZ	Best Western Beach View Lodge	3180 Carlsbad Blvd	Carlsbad	92008	33.1557680	-117.3503540	3
3	334	San Diego	CZ	Carlsbad by the Sea Resort	850 Palomar Airport Rd	Carlsbad	92008	33.1222492	-117.3197066	3
4	335	San Diego	CZ	Grand Pacific Palsades Resort	5805 Armada Dr	Carlsbad	92008	33.1252099	-117.3147141	3
5	336	San Diego	CZ	West Inn and Suites	4970 Avenida Encinas	Carlsbad	92008	33.1353100	-117.3312700	3
6	337	San Diego	CZ	La Quinta Inn Carlsbad	760 Macadamia Dr	Carlsbad	92011	33.1061752	-117.3142168	2
7	338	San Diego	CZ	Hilton Garden Inn Carlsbad Beach	6450 Carlsbad Blvd	Carlsbad	92011	33.1214474	-117.3260457	4
8	339	San Diego	CZ	Beach Terrace Inn	2775 Ocean St	Carlsbad	92008	33.1592030	-117.3542880	3
9	340	San Diego	CZ	Carlsbad Inn Beach Resort	3075 Carlsbad Blvd	Carlsbad	92008	33.1571830	-117.3514020	3
10	341	San Diego	CZ	Tamarack Beach Resort	3200 Carlsbad Blvd	Carlsbad	92008	33.1546340	-117.3502530	3
11	342	San Diego	CZ	Courtyard San Diego Carlsbad	5835 Owens Ave	Carlsbad	92008	33.1223230	-117.2812390	3
12	343	San Diego	CZ	Hyatt House San Diego Carlsbad	5010 Avenida Encinas	Carlsbad	92008	33.1332730	-117.3299910	3
13	344	San Diego	CZ	Ramada Carlsbad	751 Macadamia Dr	Carlsbad	92011	33.1057550	-117.3133970	2
14	345	San Diego	CZ	Park Hyatt Aviara Resort	7100 Aviara Resort Dr	Carlsbad	92011	33.0993130	-117.2855270	5
15	346	San Diego	CZ	Hilton Carlsbad Oceanfront Resort & Spa	1 Ponto Rd	Carlsbad	92011	33.0982510	-117.3160480	4
16	347	San Diego	CZ	Loews Coronado Bay Resort	4000 Coronado Bay Rd	Coronado	92118	32.6318260	-117.1341940	4
17	348	San Diego	CZ	Glorietta Bay Inn	1630 Glorietta Blvd	Coronado	92118	32.6817690	-117.1764380	3
18	349	San Diego	CZ	Hotel Del Coronado	1500 Orange Ave	Coronado	92118	32.6809290	-117.1784430	4
19	350	San Diego	CZ	Marriott Coronado Island Resort & Spa	2000 2nd St	Coronado	92118	32.6948240	-117.1659900	3
20	351	San Diego	CZ	Best Western Plus Suites Hotel Coronado Island	275 Orange Ave	Coronado	92118	32.6959450	-117.1734260	2
21	352	San Diego	CZ	Clarion Del Mar Inn	720 Camino Del Mar	Del Mar	92014	32.9513480	-117.2627540	3
22	353	San Diego	CZ	L' Auberge Del Mar Resort	1540 Camino Del Mar	Del Mar	92014	32.9601210	-117.2659590	4
23	354	San Diego	CZ	Hotel Indigo San Diego Del Mar	710 Camino Del Mar	Del Mar	92014	32.9502790	-117.2623950	3
24	355	San Diego	CZ	Hilton San Diego Del Mar	15575 Jimmy Durante Blvd	Del Mar	92014	32.9781400	-117.2550580	3
25	356	San Diego	CZ	Howard Johnson San Diego Encinitas	607 Leucadia Blvd	Encinitas	92024	33.0648676	-117.2911634	2
26	357	San Diego	CZ	Best Western Encinitas Inn & Suites At M	85 Encinitas Blvd	Encinitas	92024	33.0486209	-117.2904529	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
27	358	San Diego	CZ	Econo Lodge Encinitas Moonlight Beach	410 N Coast Highway 101	Encinitas	92024	33.0567290	-117.2989560	2
28	359	San Diego	CZ	Rodeway Inn North Encinitas	1444 N Coast Highway 101	Encinitas	92024	33.0728480	-117.3052080	2
29	360	San Diego	CZ	Days Inn Encinitas Lego Land Moonlight	133 Encinitas Blvd	Encinitas	92024	33.0478610	-117.2894460	2
30	361	San Diego	CZ	Best Western Inn by the Sea	7830 Fay Avenue	La Jolla	92037	32.8455490	-117.2758260	3
31	362	San Diego	CZ	Hilton La Jolla Torrey Pines	10950 N Torrey Pines Rd	La Jolla	92037	32.9015358	-117.2437714	3
32	363	San Diego	CZ	Travelodge San Diego La Jolla Beach	6750 La Jolla Blvd	La Jolla	92037	32.8302010	-117.2776200	2
33	364	San Diego	CZ	Holiday Inn Express La Jolla	6705 La Jolla Blvd	La Jolla	92037	32.8296780	-117.2767860	3
34	365	San Diego	CZ	La Jolla Shores Hotel	8110 Camino Del Oro	La Jolla	92037	32.8549130	-117.2579440	3
35	366	San Diego	CZ	Grande Colonial	910 Prospect St	La Jolla	92037	32.8472560	-117.2755360	4
36	367	San Diego	CZ	Kimpton Hotel La Jolla	7955 La Jolla Shores Dr	La Jolla	92037	32.8513470	-117.2532780	3
37	368	San Diego	CZ	The Lodge @ Torrey Pines	11480 N Torrey Pines Rd	La Jolla	92037	32.9042990	-117.2445250	5
38	369	San Diego	CZ	Preferred La Valencia Hotel	1132 Prospect St	La Jolla	92037	32.8485800	-117.2737130	4
39	370	San Diego	CZ	Estancia La Jolla Hotel & Spa	9700 N Torrey Pines Rd	La Jolla	92037	32.8837270	-117.2444420	4
40	371	San Diego	CZ	Scripps Inn	555 Coast Blvd S	La Jolla	92037	32.8439400	-117.2788940	3
41	372	San Diego	CZ	Best Western Plus Marina Gateway Hotel	800 Bay Marina Dr	National City	91950	32.6588600	-117.1097480	3
42	373	San Diego	CZ	Days Inn Oceanside	1501 Carmelo Dr	Oceanside	92054	33.2078110	-117.3886390	2
43	374	San Diego	CZ	La Quinta Inns & Suites Oceanside	937 N Coast Hwy	Oceanside	92054	33.2026600	-117.3845710	2
44	375	San Diego	CZ	Holiday Inn & Suites Oceanside Camp Pendleton Area	1401 Carmelo Dr	Oceanside	92054	33.2074980	-117.3879000	3
45	376	San Diego	CZ	Springhill Suites San Diego Oceanside Downtown	110 North Myers St.	Oceanside , CA	92054	33.1939530	-117.3816740	3
46	377	San Diego	CZ	Best Western Posada at the Yac	5005 N Harbor Dr	San Diego	92106	32.7259147	-117.2260532	2
47	378	San Diego	CZ	Best Western Island Palms Htl	2051 Shelter Island Dr	San Diego	92106	32.7135551	-117.2269768	3
48	379	San Diego	CZ	Humphrey's Half Moon Inn	2303 Shelter Island Dr	San Diego	92106	32.7186180	-117.2245720	3
49	380	San Diego	CZ	Hilton San Diego Resort	1775 E Mission Bay Dr	San Diego	92109	32.7789080	-117.2097770	3
50	381	San Diego	CZ	Wyndham San Diego Bayside	1355 N Harbor Dr	San Diego	92101	32.7192730	-117.1724580	3
51	382	San Diego	CZ	Sheraton Hotel & Marina San Diego	1380 Harbor Island Dr	San Diego	92101	32.7272520	-117.1978950	3
52	383	San Diego	CZ	Marriott San Diego Marquis & Marina	333 W Harbor Dr	San Diego	92101	32.7084220	-117.1651950	4
53	384	San Diego	CZ	Grand Hyatt Manchester San Diego	1 Market Pl	San Diego	92101	32.7102430	-117.1681700	4
54	385	San Diego	CZ	Embassy Suites San Diego Bay Downtown	601 Pacific Hwy	San Diego	92101	32.7120020	-117.1705590	3
55	386	San Diego	CZ	Residence Inn San Diego Downtown	1747 Pacific Hwy	San Diego	92101	32.7233240	-117.1708590	3
56	387	San Diego	CZ	Hampton Inn San Diego Downtown	1531 Pacific Hwy	San Diego	92101	32.7213340	-117.1707270	3
57	388	San Diego	CZ	Hilton San Diego Bayfront	1 Park Blvd	San Diego	92101	32.7032540	-117.1586210	4
58	389	San Diego	CZ	Comfort Inn San Diego @ The Harbor	5102 N Harbor Dr	San Diego	92106	32.7256190	-117.2275640	2
59	390	San Diego	CZ	Holiday Inn San Diego Bayside	4875 N Harbor Dr	San Diego	92106	32.7260750	-117.2225450	3
60	391	San Diego	CZ	Ramada San Diego Airport	1403 Rosecrans St	San Diego	92106	32.7249760	-117.2284650	2
61	392	San Diego	CZ	Kona Kai Resort & Spa	1551 Shelter Island Dr	San Diego	92106	32.7095620	-117.2317810	3
62	393	San Diego	CZ	Homewood Suites San Diego Airport Liberty Station	2576 Laning Rd	San Diego	92106	32.7292200	-117.2160880	3
63	394	San Diego	CZ	Courtyard San Diego Airport Liberty Station	2592 Laning Rd	San Diego	92106	32.7307470	-117.2157310	3
64	395	San Diego	CZ	Hyatt Regency Mission Bay	1441 Quivira Rd	San Diego	92109	32.7654640	-117.2396420	4
65	396	San Diego	CZ	Catamaran Resort Hotel	3999 Mission Blvd	San Diego	92109	32.7895320	-117.2527360	3
66	397	San Diego	CZ	The Dana On Mission Bay	1710 W Mission Bay Dr	San Diego	92109	32.7657690	-117.2371450	3
67	398	San Diego	CZ	Holiday Inn Express San Diego Sea World Beach Area	4540 Mission Bay Dr	San Diego	92109	32.8029530	-117.2172190	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
68	399	San Diego	CZ	Red Roof Inn San Diego Pacific Beach Sea World Area	4545 Mission Bay Dr	San Diego	92109	32.8037610	-117.2168780	2
69	400	San Diego	CZ	Doubletree San Diego Del Mar	11915 El Camino Real	San Diego	92130	32.9358650	-117.2362660	3
70	401	San Diego	CZ	Hampton Inn San Diego Del Mar	11920 El Camino Real	San Diego	92130	32.9349860	-117.2382900	3
71	402	San Diego	CZ	Marriott San Diego Del Mar	11966 El Camino Real	San Diego	92130	32.9358190	-117.2388810	3
72	403	San Diego	CZ	Courtyard San Diego Solana Beach Del Mar	717 S Hwy 101	Solana Beach	92075	32.9829430	-117.2700310	3
73	404	San Diego	CZ	Holiday Inn Express & Suites Solana Beach Del Mar	621 S Hwy 101	Solana Beach	92075	32.9839690	-117.2706490	3
Outside Coastal Zone, Inside Five-Mile Zone (67 hotels)										
1	405	San Diego	FZ	Econo Lodge Inn & Suites Near Legoland Carlsbad	3666 Pio Pico Dr	Carlsbad	92008	33.1557950	-117.3375510	2
2	406	San Diego	FZ	Rodeway Inn Near Legoland Carlsbad	3570 Pio Pico Dr	Carlsbad	92008	33.1573860	-117.3384950	2
3	407	San Diego	FZ	Hampton Inn	2229 Palomar Airport Rd	Carlsbad	92011	33.1259157	-117.2735142	3
4	408	San Diego	FZ	Homewood Suites-Carlsbad	2223 Palomar Airport Rd	Carlsbad	92011	33.1258634	-117.2745261	3
5	409	San Diego	FZ	Best Western Chula Vista Inn	946 Broadway	Chula Vista	91911	32.6158865	-117.0838403	2
6	410	San Diego	FZ	Best Western South Bay Inn	710 E St	Chula Vista	91910	32.6398520	-117.0981430	2
7	411	San Diego	FZ	Holiday Inn Express San Diego South Chula Vista	632 E St	Chula Vista	91910	32.6405250	-117.0949460	3
8	412	San Diego	FZ	Marriott San Diego La Jolla	4240 La Jolla Village Dr	La Jolla	92037	32.8730640	-117.2157230	3
9	413	San Diego	FZ	Sheraton Hotel La Jolla	3299 Holiday Ct	La Jolla	92037	32.8704260	-117.2314790	3
10	414	San Diego	FZ	Residence Inn San Diego La Jolla	8901 Gilman Dr	La Jolla	92037	32.8705010	-117.2371290	3
11	415	San Diego	FZ	Clarion Hotel National City San Diego South	700 National City Blvd	National City	91950	32.6761190	-117.1078410	3
12	416	San Diego	FZ	Best Western Oceanside Inn	1680 Oceanside Blvd	Oceanside	92054	33.1898700	-117.3643730	2
13	417	San Diego	FZ	Quality Inn & Suites I-5 Near Camp Pendleton Oceanside	1403 Mission Ave	Oceanside	92058	33.2008416	-117.3703539	2
14	418	San Diego	FZ	Residence Inn San Diego Oceanside	3603 Ocean Ranch Blvd	Oceanside	92056	33.2088590	-117.3109850	3
15	419	San Diego	FZ	Courtyard San Diego Oceanside	3501 Seagate Way	Oceanside	92056	33.2066160	-117.3108730	3
16	420	San Diego	FZ	Super 8 Oceanside	3240 Mission Ave	Oceanside	92058	33.2150000	-117.3466630	2
17	421	San Diego	FZ	Morgan Run Resort	5690 Cancha De Golf	Rancho Santa Fe	92091	32.9909480	-117.2103560	3
18	422	San Diego	FZ	Best Western Bayside Inn	555 W Ash St	San Diego	92101	32.7196100	-117.1678350	3
19	423	San Diego	FZ	Best Western Cabrillo Garden Inn	840 W A St	San Diego	92101	32.7189212	-117.1567702	2
20	424	San Diego	FZ	Westgate Hotel	1055 2nd Ave	San Diego	92101	32.7162920	-117.1627350	4
21	425	San Diego	FZ	Porto Vista Hotel & Suites	1835 Columbia St	San Diego	92101	32.7243910	-117.1672580	3
22	426	San Diego	FZ	W San Diego	421 W B St	San Diego	92103	32.7176260	-117.1667460	3
23	427	San Diego	FZ	Best Western Mission Bay	2575 Clairemont Dr	San Diego	92110	32.7904272	-117.2038016	2
24	428	San Diego	FZ	Best Western Hacienda Suites O	4041 Harney St	San Diego	92110	32.7528500	-117.1931890	3
25	429	San Diego	FZ	Four Points San Diego Downtown	1617 1st Ave	San Diego	92101	32.7224000	-117.1634170	3
26	430	San Diego	FZ	Hilton San Diego Airport Harbor Island	1960 Harbor Island Dr	San Diego	92101	32.7251990	-117.2090960	3
27	431	San Diego	FZ	Bristol Hotel	1055 First Ave	San Diego	92101	32.7164190	-117.1635170	3
28	432	San Diego	FZ	Westin San Diego	400 W Broadway	San Diego	92101	32.7161730	-117.1669940	4
29	433	San Diego	FZ	Holiday Inn Express San Diego Downtown	1430 7th Ave	San Diego	92101	32.7204350	-117.1586050	3
30	434	San Diego	FZ	Luxury Collection The US Grant San Diego	326 Broadway	San Diego	92101	32.7159930	-117.1615290	4
31	435	San Diego	FZ	Marriott San Diego Gaslamp Quarter	530 Broadway	San Diego	92101	32.7159950	-117.1595540	4
32	436	San Diego	FZ	Westin San Diego Gaslamp Quarter	910 Broadway Cir	San Diego	92101	32.7144150	-117.1631190	4
33	437	San Diego	FZ	Comfort Inn Gaslamp San Diego	660 G St	San Diego	92101	32.7126820	-117.1584850	2
34	438	San Diego	FZ	Doubletree San Diego Downtown	1646 Front St	San Diego	92101	32.7223930	-117.1652230	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
35	439	San Diego	FZ	The Declan Suites San Diego	701 A St	San Diego	92101	32.7186460	-117.1579210	3
36	440	San Diego	FZ	Courtyard San Diego Downtown	530 Broadway	San Diego	92101	32.7159060	-117.1593330	3
37	441	San Diego	FZ	Hilton San Diego Gaslamp Quarter	401 K St	San Diego	92101	32.7079950	-117.1607830	3
38	442	San Diego	FZ	Omni San Diego Hotel	675 L St	San Diego	92101	32.7071370	-117.1588540	4
39	443	San Diego	FZ	Americas Best Value Inn San Diego Downtown	1840 4th Ave	San Diego	92101	32.7247990	-117.1614490	2
40	444	San Diego	FZ	Andaz San Diego	600 F St	San Diego	92101	32.7137200	-117.1587190	4
41	445	San Diego	FZ	Hard Rock Hotel San Diego	207 5th Ave	San Diego	92101	32.7074750	-117.1597510	4
42	446	San Diego	FZ	Residence Inn San Diego Downtown Gaslamp Quarter	356 6th Ave	San Diego	92101	32.7090150	-117.1594440	3
43	447	San Diego	FZ	Hotel Indigo San Diego Gaslamp Quarter	509 9th Ave	San Diego	92101	32.7107210	-117.1561910	3
44	448	San Diego	FZ	Howard Johnson Hotel San Diego Zoo Sea World	3330 Rosecrans St	San Diego	92108	32.7482890	-117.2080630	3
45	449	San Diego	FZ	Paradise Point Resort	1404 Vacation Rd	San Diego	92109	32.7751340	-117.2387880	4
46	450	San Diego	FZ	La Quinta Inns & Suites San Diego Mission Bay	4610 De Soto St	San Diego	92109	32.8072480	-117.2181180	3
47	451	San Diego	FZ	Wyndham Garden Hotel San Diego Near Sea World	3737 Sports Arena Blvd	San Diego	92110	32.7539840	-117.2154110	3
48	452	San Diego	FZ	La Quinta Inns & Suites San Diego Old Town Airport	2380 Moore St	San Diego	92110	32.7493720	-117.1947250	3
49	453	San Diego	FZ	Old Town Inn	4444 Pacific Hwy	San Diego	92110	32.7518880	-117.2007140	2
50	454	San Diego	FZ	Holiday Inn Express San Diego Sea World Area	3950 Jupiter St	San Diego	92110	32.7560710	-117.2200840	3
51	455	San Diego	FZ	Courtyard San Diego Old Town	2435 Jefferson St	San Diego	92110	32.7500040	-117.1952370	3
52	456	San Diego	FZ	Holiday Inn Express San Diego Airport Old Town	1955 San Diego Ave	San Diego	92110	32.7452510	-117.1869000	3
53	457	San Diego	FZ	Fairfield Inn & Suites San Diego Old Town	3900 Old Town Ave	San Diego	92110	32.7491900	-117.1926280	3
54	458	San Diego	FZ	Quality Inn I 5 Naval Base San Diego	3878 Daibergeria Ct	San Diego	92113	32.6833140	-117.1108640	2
55	459	San Diego	FZ	Courtyard San Diego Sorrento Mesa	9650 Scranton Rd	San Diego	92121	32.8954780	-117.2035430	3
56	460	San Diego	FZ	Country Inn & Suites San Diego North	5975 Lusk Blvd	San Diego	92121	32.8980540	-117.1926550	3
57	461	San Diego	FZ	Residence Inn San Diego Sorrento Mesa Sorrento Valley	5995 Pacific Mesa Ct	San Diego	92121	32.9016360	-117.1882670	3
58	462	San Diego	FZ	Hyatt House San Diego Sorrento Mesa	10044 Pacific Mesa Blvd	San Diego	92121	32.8994670	-117.1919540	3
59	463	San Diego	FZ	Holiday Inn Express & Suites San Diego Sorrento	5925 Lusk Blvd	San Diego	92121	32.8970720	-117.1935110	3
60	464	San Diego	FZ	Embassy Suites San Diego La Jolla	4550 La Jolla Village Dr	San Diego	92122	32.8744580	-117.2083930	3
61	465	San Diego	FZ	Hyatt Regency La Jolla @ Aventine	3777 La Jolla Village Dr	San Diego	92122	32.8707760	-117.2254250	4
62	466	San Diego	FZ	Homewood Suites San Diego Del Mar	11025 Vista Sorrento Pkwy	San Diego	92130	32.9164860	-117.2290860	3
63	467	San Diego	FZ	Preferred The Grand Del Mar	5300 Grand Del Mar Ct	San Diego	92130	32.9383840	-117.1976900	5
64	468	San Diego	FZ	Hilton Garden Inn San Diego Del Mar	3939 Ocean Bluff Ave	San Diego	92130	32.9171410	-117.2286310	3
65	469	San Diego	FZ	Hampton Inn San Diego Mission Valley	2151 Hotel Cir S	San Diego	92108	32.7582590	-117.1821060	3
66	470	San Diego	FZ	Holiday Inn Express & Suites San Diego Hotel Circle	635 Hotel Cir S	San Diego	92108	32.7598890	-117.1694660	3
67	471	San Diego	FZ	Quality Inn & Suites Near The Border San Ysidro	930 W San Ysidro Blvd	San Ysidro	92173	32.5594000	-117.0632300	2

A3. Hotel Maps

Figures A1 through A4 show maps of Coastal Zone and Five-Mile Zone hotels in the California coastal counties. The maps are organized by region:

- **Northern California:** Del Norte County, Humboldt County, and Mendocino County.
- **Bay Area California:** Sonoma County, Marin County, San Francisco County, San Mateo County, and Santa Cruz County.
- **Central Coast California:** Monterey County, San Luis Obispo County, Santa Barbara County, and Ventura County.
- **Southern California:** Los Angeles County, Orange County, and San Diego County.

The hotels presented in these maps include all AAA-rated and non-AAA-rated hotels. The maps do not include new hotels added from the September 24, 2015 STR participation list of new hotels participating in STR surveys since January 1, 2014. The mapping process for the new hotels is explained in Chapter 5 and a listing of these hotels is provided in Appendix D.

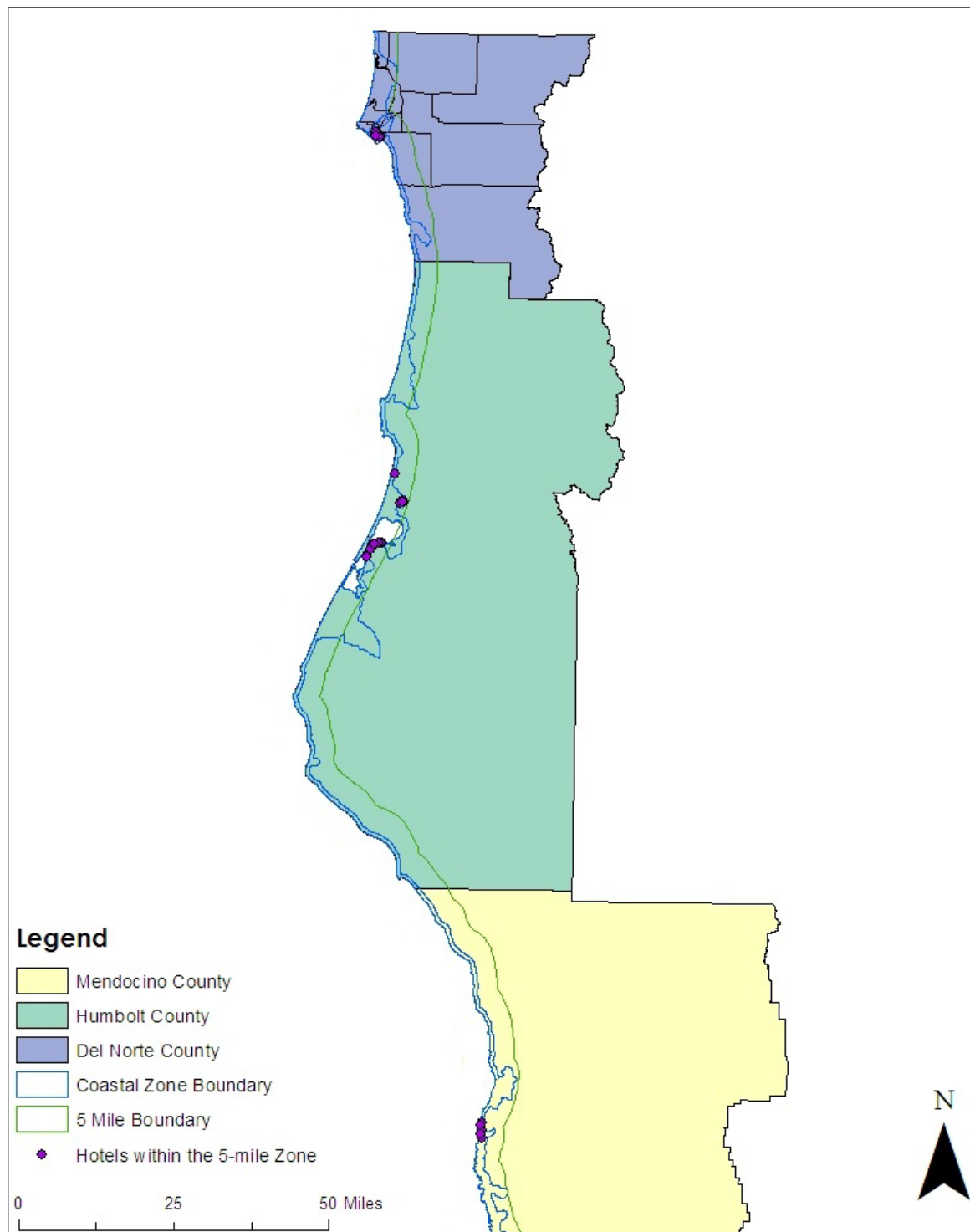


Figure A1. Northern California Counties Hotel Map

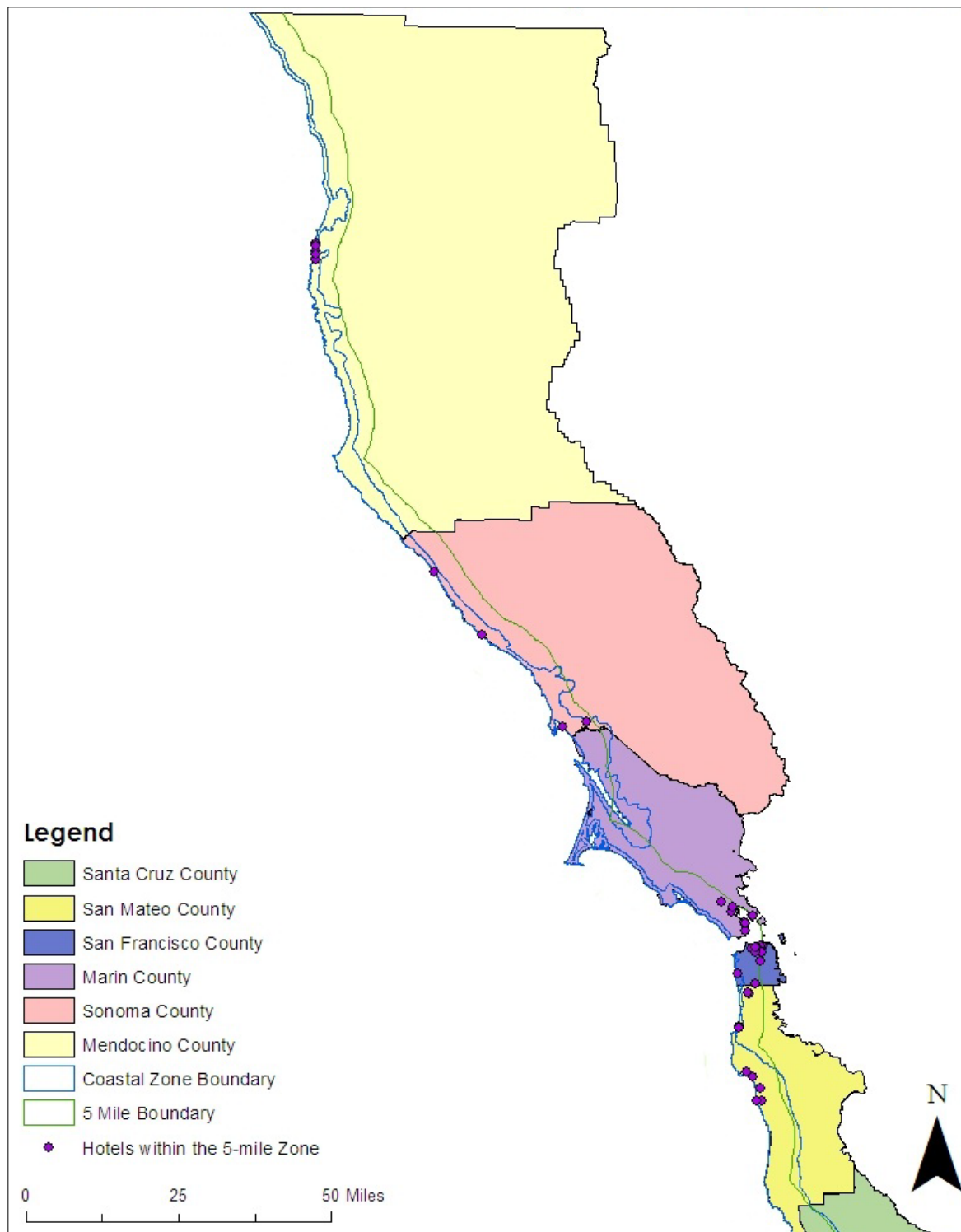


Figure A2. Bay Area California Counties Hotel Map

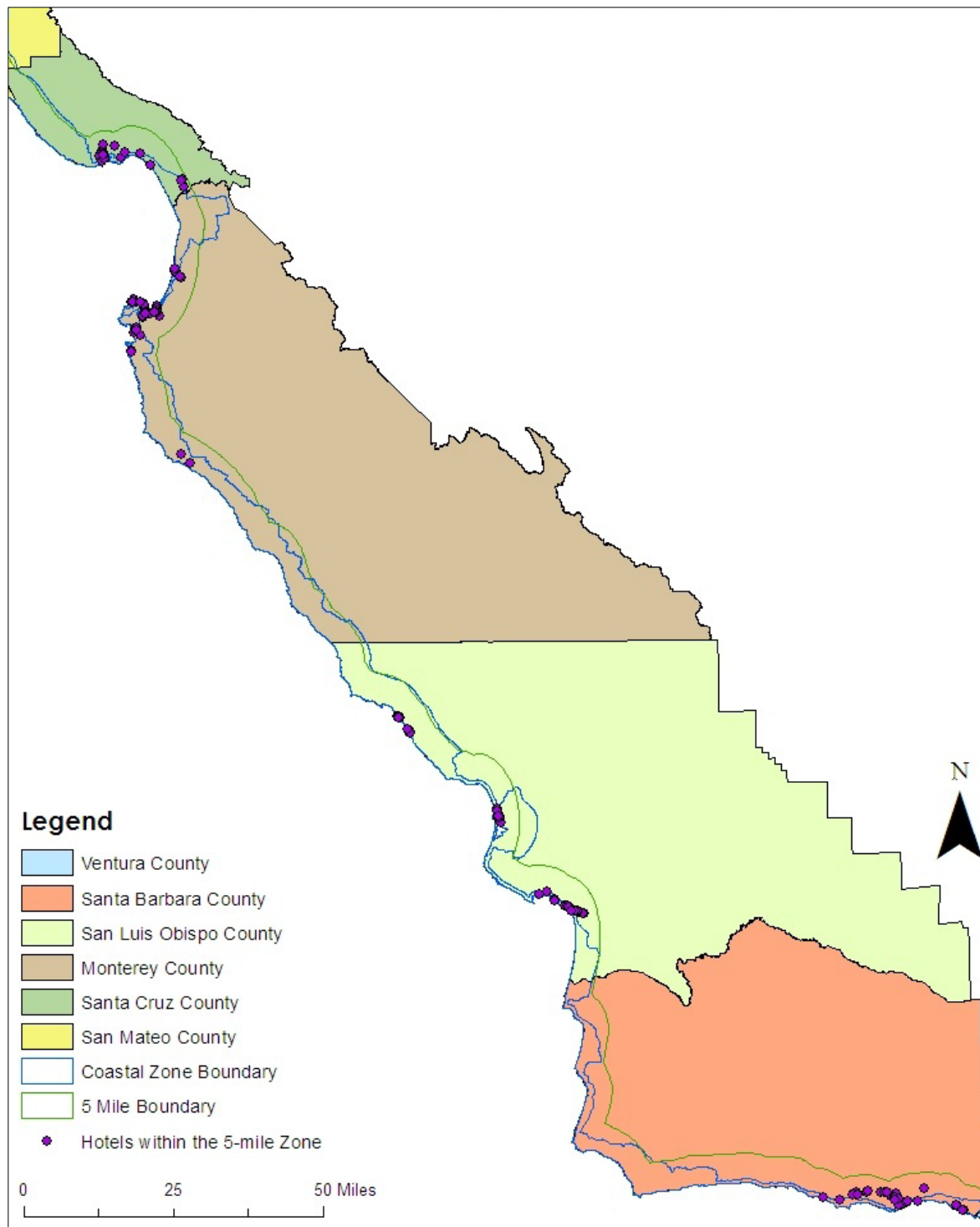


Figure A3. Central Coast Counties California Hotel Map

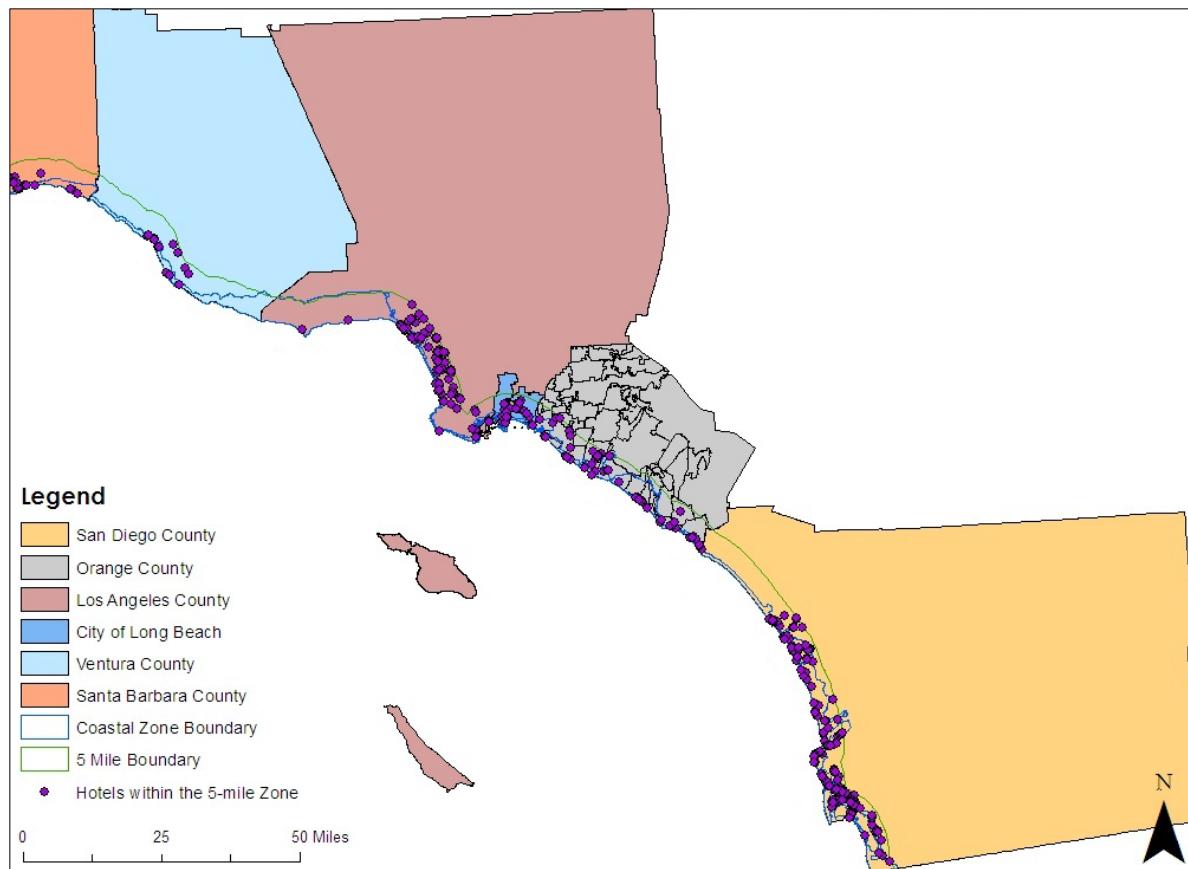


Figure A4. Southern California Counties Hotel Map

Appendix B. CCC Local Inventory Analysis: Hotel Inventories and Maps

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B1. Introduction

Appendix B presents the hotel inventories and maps for the CCC local cost analysis performed in Chapter 5. The eight inventories studied for this analysis are shown in Table B1.

Table B1. Inventories for CCC Local Cost Analysis

Political	Distance From Coast	Hotel Count
City of Long Beach	Coastal Zone	5
City of Long Beach	Five-Mile Zone	17
Los Angeles County	Coastal Zone	27
Los Angeles County	Five-Mile Zone	101
Orange County	Coastal Zone	26
Orange County	Five-Mile Zone	42
Los Angeles County and Orange County	Coastal Zone	53
Los Angeles County and Orange County	Five-Mile Zone	143

As explained in Chapter 5, the hotels in these inventories participate STR surveys, are located in the Coastal Zone or Five-Mile Zone, and are AAA-rated.

As explained in Appendix A, the 471 hotels California Coastal Counties – Five Mile Zone, part of the California coastal premium analysis, also serve as the master list for unique hotels used for data analysis. Accordingly, all of these hotels in the CCC local costs analysis inventories also appear in the California coastal premium analysis inventories presented in Appendix A. For cross-references purposes, each hotel is assigned a unique identification number (ID) from 000 to 471.

B2. Hotel Inventories

Tables B2 through B5 list the hotels for the CCC local cost analysis inventories. To avoid redundancy in presentation, each hotel is listed only once per table. Each table includes the AAA-rated hotels in the respective county's Five-Mile Zone. The hotels in each table are divided into two groups:

- Hotels in the Coastal Zone, and
- Hotels outside the Coastal Zone, but inside the Five-Mile Zone.

The Coastal Zone inventory consists only of the hotels listed in the first group. The Five-Mile Zone inventory consists of hotels listed in both groups.

Each table is ordered by zone (the two groups described above, city, then zip code). The ID is the hotel's unique number from unique 000 to 471. The list number (No.) is the hotel's position on the list under the group heading to the table, but not across all inventories.

Table B2. City of Long Beach Hotel Inventory (17 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (5 hotels)										
1	190	Los Angeles	CZ	Hyatt Regency Long Beach	200 S Pine Ave	Long Beach	90802	33.7635248	-118.1914638	4
2	191	Los Angeles	CZ	RI Long Beach Downtown	600 Queensway Dr	Long Beach	90802	33.7587510	-118.2013113	3
3	192	Los Angeles	CZ	Best Western Golden Sails Htl	6285 E Pacific Coast Hwy	Long Beach	90803	33.7656980	-118.1156440	2
4	193	Los Angeles	CZ	Doubletree Hotel Maya	700 Queensway Dr	Long Beach	90802	33.7571330	-118.1985300	3
5	194	Los Angeles	CZ	Hyatt The Pike Long Beach	285 Bay St	Long Beach	90802	33.7649970	-118.1946570	3
Outside Coastal Zone, Inside Five-Mile Zone (12 hotels)										
1	234	Los Angeles	FZ	Renaissance Long Beach Hotel	111 E Ocean Blvd	Long Beach	90704	33.7593626	-118.2416893	3
2	235	Los Angeles	FZ	Holiday Inn Hotel Long Beach (Dwtn Area)	1133 Atlantic Ave	Long Beach	90704	33.7816303	-118.1851716	3
3	236	Los Angeles	FZ	Holiday Inn Hotel Long Beach-Airport (Conf Ctr)	2640 N Lakewood Blvd	Long Beach	90706	33.8034610	-118.1425580	3
4	237	Los Angeles	FZ	Comfort Inn & Suites Near Long Beach Conv Center	200 E Willow St	Long Beach	90706	33.8042468	-118.1908723	3
5	238	Los Angeles	FZ	Travelodge Long Beach Convention Center	80 Atlantic Ave	Long Beach	90802	33.7677371	-118.1850264	2
6	239	Los Angeles	FZ	Best Western of Long Beach	1725 Long Beach Blvd	Long Beach	90813	33.7887500	-118.1899050	2
7	240	Los Angeles	FZ	RI LONG BEACH	4111 E Willow St	Long Beach	90815	33.8035829	-118.1443800	3
8	241	Los Angeles	FZ	Marriott Long Beach Airport	4700 Airport Plaza Dr	Long Beach	90815	33.8115480	-118.1383780	3
9	242	Los Angeles	FZ	Extended Stay America Los Angeles - Long Beach Airport	4105 E Willow St	Long Beach	90815	33.8043260	-118.1463940	2
10	243	Los Angeles	FZ	Quality Inn Long Beach Airport	3201 E Pacific Coast Hwy	Long Beach	90755	33.7903280	-118.1543320	2
11	244	Los Angeles	FZ	Courtyard Long Beach Downtown	500 E 1st St	Long Beach	90802	33.7676010	-118.1856180	3
12	245	Los Angeles	FZ	Hotel Current	5325 Pacific Coast Hwy	Long Beach	90804	33.7814680	-118.1303120	3

Table B3. Los Angeles County Hotel Inventory (101 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (27 hotels)										
1	189	Los Angeles	CZ	Beach House Hotel Hermosa Beach	1300 The Strand	Hermosa Beach	90254	33.8626163	-118.4019475	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
2	190	Los Angeles	CZ	Hyatt Regency Long Beach	200 S Pine Ave	Long Beach	90802	33.7635248	-118.1914638	4
3	191	Los Angeles	CZ	RI Long Beach Downtown	600 Queensway Dr	Long Beach	90802	33.7587510	-118.2013113	3
4	192	Los Angeles	CZ	Best Western Golden Sails Htl	6285 E Pacific Coast Hwy	Long Beach	90803	33.7656980	-118.1156440	2
5	193	Los Angeles	CZ	Doubletree Hotel Maya	700 Queensway Dr	Long Beach	90802	33.7571330	-118.1985300	3
6	194	Los Angeles	CZ	Hyatt The Pike Long Beach	285 Bay St	Long Beach	90802	33.7649970	-118.1946570	3
7	195	Los Angeles	CZ	The Inn at Venice Beach	327 Washington Blvd	Marina Del Rey	90292	33.9808303	-118.4641381	3
8	196	Los Angeles	CZ	Marina Del Rey Marriott	4100 Admiralty Way	Marina Del Rey	90292	33.9820510	-118.4595250	3
9	197	Los Angeles	CZ	The Ritz Carlton, Marina Del Rey	4375 Admiralty Way	Marina Del Rey	90292	33.9847217	-118.4505725	5
10	198	Los Angeles	CZ	DoubleTree Hotel MDR Marina Del Rey	13480 Maxella Ave	Marina Del Rey	90292	33.9851010	-118.4410280	3
11	199	Los Angeles	CZ	Hilton Garden Inn Marina Del Rey	4200 Admiralty Way	Marina Del Rey	90292	33.9836080	-118.4572140	3
12	200	Los Angeles	CZ	Terranea Resort	100 Terranea Way	Rancho Palos Verdes	90275	33.7384620	-118.3978690	4
13	201	Los Angeles	CZ	The Portofino Hotel and Yacht Club - A Noble House Hotel	260 Portofino Way	Redondo Beach	90277	33.8443997	-118.3966112	3
14	202	Los Angeles	CZ	Crowne Plaza Hotel Redondo Beach and Marina	300 N Harbor Dr	Redondo Beach	90277	33.8454585	-118.3928619	3
15	203	Los Angeles	CZ	Ramada Limited Redondo Beach	435 S Pacific Coast Hwy	Redondo Beach	90277	33.8353422	-118.3853403	2
16	204	Los Angeles	CZ	The Huntley Hotel	1111 2nd St	Santa Monica	90401	34.0187223	-118.5010592	3
17	205	Los Angeles	CZ	Viceroy Santa Monica	1819 Ocean Ave	Santa Monica	90401	34.0079333	-118.4907767	3
18	206	Los Angeles	CZ	Shangri-La Hotel	1301 Ocean Ave	Santa Monica	90401	34.0154272	-118.4993043	3
19	207	Los Angeles	CZ	Loews Santa Monica Beach Hotel	1700 Ocean Ave	Santa Monica	90401	34.0091184	-118.4930376	4
20	208	Los Angeles	CZ	JW Marriott Santa Monica Le Merigot	1740 Ocean Ave	Santa Monica	90401	34.0084910	-118.4924020	4
21	209	Los Angeles	CZ	Oceana Santa Monica	849 Ocean Ave	Santa Monica	90403	34.0213830	-118.5059580	3
22	210	Los Angeles	CZ	Wyndham Santa Monica Beach @ The Pier	120 Colorado Ave	Santa Monica	90401	34.0118320	-118.4941630	3
23	211	Los Angeles	CZ	Fairmont Miramar	101 Wilshire Blvd	Santa Monica	90401	34.0179160	-118.5016220	4
24	212	Los Angeles	CZ	Georgian Hotel	1415 Ocean Ave	Santa Monica	90401	34.0136710	-118.4973510	3
25	213	Los Angeles	CZ	Ocean View Hotel	1447 Ocean Ave	Santa Monica	90401	34.0131740	-118.4965600	2
26	214	Los Angeles	CZ	Shore Hotel	1515 Ocean Ave	Santa Monica	90401	34.0127100	-118.4956390	4
27	215	Los Angeles	CZ	Le Meridien Delfina Santa Monica	530 Pico Blvd	Santa Monica	90405	34.0107850	-118.4853660	4
Outside Coastal Zone, Inside Five-Mile Zone (74 hotels)										
1	216	Los Angeles	FZ	Four Points by Sheraton Los Angeles Westside	5990 Green Valley Cir	Culver City	90230	33.9838010	-118.3938540	3
2	217	Los Angeles	FZ	Travelodge Los Angeles Culver City	11180 Washington Pl	Culver City	90232	34.0089013	-118.4134370	2
3	218	Los Angeles	FZ	Doubletree by Hilton Hotel Los Angeles International Airport	1985 E Grand Ave	El Segundo	90245	33.9198460	-118.3920390	3
4	219	Los Angeles	FZ	Embassy Stes Lax South	1440 E Imperial Ave	El Segundo	90245	33.9305740	-118.4007440	3
5	220	Los Angeles	FZ	Courtyard by Marriott Los Angeles LAX El Segundo	2000 E Mariposa Ave	El Segundo	90245	33.9230480	-118.3914590	3
6	221	Los Angeles	FZ	Hilton Garden Inn LAX El Segundo	2100 E Mariposa Ave	El Segundo	90245	33.9230230	-118.3883270	3
7	222	Los Angeles	FZ	Residence Inn by Marriott El Segundo	2135 E El Segundo Blvd	El Segundo	90245	33.9166190	-118.3887580	3
8	223	Los Angeles	FZ	Extended Stay America Los Angeles LAX Airport El Segundo	1910 E Mariposa Ave	El Segundo	90245	33.9235690	-118.3946800	2
9	224	Los Angeles	FZ	Hyatt Place Los Angeles LAX El Segundo	750 N Nash St	El Segundo	90245	33.9262100	-118.3871810	3
10	225	Los Angeles	FZ	Springhill Suites by Marriott Manhattan Beach	14620 Aviation Blvd	Hawthorne	90250	33.8986850	-118.3780930	3
11	226	Los Angeles	FZ	Towneplace Suites by Marriott Los Angeles LAX/Manhattan Beach	14400 Aviation Blvd	Hawthorne	90260	33.9009600	-118.3780790	2
12	227	Los Angeles	FZ	Hampton Inn Los Angeles International Airport Hawthorne	11430 Acacia Ave	Hawthorne	90250	33.9306680	-118.3506600	3
13	228	Los Angeles	FZ	Quality Inn & Suites Hermosa Beach	901 Aviation Blvd	Hermosa Beach	90254	33.8633567	-118.3911203	3
14	229	Los Angeles	FZ	Holiday Inn Express Hotel & Suites Hermosa Beach	125 Pacific Coast Hwy	Hermosa Beach	90254	33.8553203	-118.3906196	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
15	230	Los Angeles	FZ	Hampton Inn and Suites	1530 Pacific Coast Hwy	Hermosa Beach	90254	33.8658448	-118.3933275	3
16	231	Los Angeles	FZ	Wingate by Wyndham Los Angeles International Airport LAX	10300 S La Cienega Blvd	Inglewood	90304	33.9423811	-118.3699051	3
17	232	Los Angeles	FZ	Best Western South Bay Hotel	15000 Hawthorne Blvd	Lawndale	90260	33.8952471	-118.3522186	3
18	233	Los Angeles	FZ	Days Inn LAX Airport South Bay - Lawndale	15636 Hawthorne Blvd	Lawndale	90260	33.8886130	-118.3517860	2
19	234	Los Angeles	FZ	Renaissance Long Beach Hotel	111 E Ocean Blvd	Long Beach	90704	33.7593626	-118.2416893	3
20	235	Los Angeles	FZ	Holiday Inn Hotel Long Beach (Dwtn Area)	1133 Atlantic Ave	Long Beach	90704	33.7816303	-118.1851716	3
21	236	Los Angeles	FZ	Holiday Inn Hotel Long Beach-Airport (Conf Ctr)	2640 N Lakewood Blvd	Long Beach	90706	33.8034610	-118.1425580	3
22	237	Los Angeles	FZ	Comfort Inn & Suites Near Long Beach Conv Center	200 E Willow St	Long Beach	90706	33.8042468	-118.1908723	3
23	238	Los Angeles	FZ	Travelodge Long Beach Convention Center	80 Atlantic Ave	Long Beach	90802	33.7677371	-118.1850264	2
24	239	Los Angeles	FZ	Best Western of Long Beach	1725 Long Beach Blvd	Long Beach	90813	33.7887500	-118.1899050	2
25	240	Los Angeles	FZ	Ri LONG BEACH	4111 E Willow St	Long Beach	90815	33.8035829	-118.1443800	3
26	241	Los Angeles	FZ	Marriott Long Beach Airport	4700 Airport Plaza Dr	Long Beach	90815	33.8115480	-118.1383780	3
27	242	Los Angeles	FZ	Extended Stay America Los Angeles - Long Beach Airport	4105 E Willow St	Long Beach	90815	33.8043260	-118.1463940	2
28	243	Los Angeles	FZ	Quality Inn Long Beach Airport	3201 E Pacific Coast Hwy	Long Beach	90755	33.7903280	-118.1543320	2
29	244	Los Angeles	FZ	Courtyard Long Beach Downtown	500 E 1st St	Long Beach	90802	33.7676010	-118.1856180	3
30	245	Los Angeles	FZ	Hotel Current	5325 Pacific Coast Hwy	Long Beach	90804	33.7814680	-118.1303120	3
31	246	Los Angeles	FZ	Holiday Inn Lax	9901 S La Cienega Blvd	Los Angeles	90045	33.9462250	-118.3711880	3
32	247	Los Angeles	FZ	Sheraton	6101 W Century Blvd	Los Angeles	90045	33.9465310	-118.3907800	3
33	248	Los Angeles	FZ	Crowne Plaza Hotel Los Angeles-Intl Airport	5985 W Century Blvd	Los Angeles	90045	33.9461664	-118.3888496	3
34	249	Los Angeles	FZ	La Quinta Inn & Suites Lax	5249 W Century Blvd	Los Angeles	90045	33.9455416	-118.3719777	3
35	250	Los Angeles	FZ	Radisson Hotel at Los Angeles Airport	6225 W Century Blvd	Los Angeles	90045	33.9458500	-118.3950740	3
36	251	Los Angeles	FZ	Four Points by Sheraton Los Angeles International Airport	9750 Airport Blvd	Los Angeles	90045	33.9476210	-118.3850643	3
37	252	Los Angeles	FZ	Embassy Suites LAX North	9801 Airport Blvd	Los Angeles	90045	33.9469520	-118.3865090	3
38	253	Los Angeles	FZ	Super8 - Los Angeles International Airport Hotel	9250 Airport Blvd	Los Angeles	90045	33.9517758	-118.3857294	2
39	254	Los Angeles	FZ	Renaissance Los Angeles Airport Hotel	9620 Airport Blvd	Los Angeles	90045	33.9491980	-118.3852390	3
40	255	Los Angeles	FZ	Courtyard by Marriott Los Angeles Century Boulevard	6161 W Century Blvd	Los Angeles	90045	33.9467100	-118.3934150	3
41	256	Los Angeles	FZ	Extended Stay America Los Angeles - LAX Airport	6531 S Sepulveda Blvd	Los Angeles	90045	33.9798020	-118.3952220	2
42	257	Los Angeles	FZ	Hotel Angeleno - A Joie De Vivre Hotel	170 N Church Ln	Los Angeles	90049	34.0736528	-118.4681940	3
43	258	Los Angeles	FZ	Best Western Royal Palace Inn	2528 S Sepulveda Blvd	Los Angeles	90064	34.0342872	-118.4333214	3
44	259	Los Angeles	FZ	Super 8 Los Angeles Culver City	12664 Washington Blvd	Los Angeles	90066	33.9968273	-118.4338681	2
45	260	Los Angeles	FZ	Rodeway Inn Culver City	11933 Washington Blvd	Los Angeles	90066	33.9979704	-118.4207488	2
46	261	Los Angeles	FZ	Luxe City Center Hotel	1020 S Figueroa St	Los Angeles	90704	33.7831215	-118.2803158	4
47	262	Los Angeles	FZ	Marriott Los Angeles Airport	5855 W Century Blvd	Los Angeles	90045	33.9466180	-118.3846890	3
48	263	Los Angeles	FZ	Hilton Los Angeles Airport	5711 W Century Blvd	Los Angeles	90045	33.9460270	-118.3816610	3
49	264	Los Angeles	FZ	Westin Los Angeles Airport	5400 W Century Blvd	Los Angeles	90045	33.9446220	-118.3741430	3
50	265	Los Angeles	FZ	Luxe Hotel Sunset Boulevard	11461 Sunset Blvd	Los Angeles	90049	34.0724580	-118.4683240	3
51	266	Los Angeles	FZ	Marriott Manhattan Beach	1400 Parkview Ave	Manhattan Beach	90266	33.9001180	-118.3882440	3
52	267	Los Angeles	FZ	Residence Inn-Lax	1700 N Sepulveda Blvd	Manhattan Beach	90266	33.8903210	-118.3958520	3
53	268	Los Angeles	FZ	Hawthorn Suites	1817 N Sepulveda Blvd	Manhattan Beach	90266	33.8920444	-118.3961056	3
54	269	Los Angeles	FZ	The Belamar Hotel	3501 N Sepulveda Blvd	Manhattan Beach	90266	33.9005810	-118.3967820	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
55	270	Los Angeles	FZ	Best Western Redondo Beach Inn	1850 S Pacific Coast Hwy	Redondo Beach	90277	33.8164670	-118.3790855	3
56	271	Los Angeles	FZ	Best Western Redondo Beach Gal	2740 Artesia Blvd	Redondo Beach	90278	33.8724200	-118.3597140	2
57	272	Los Angeles	FZ	Residence Inn Los Angeles Redondo Beach	2420 Marine Ave.	Redondo Beach, CA	90278	33.8929910	-118.3655320	3
58	273	Los Angeles	FZ	Hilton Garden Inn Los Angeles Redondo Beach	2410 Marine Ave.	Redondo Beach, CA	90278	33.8938200	-118.3665990	3
59	274	Los Angeles	FZ	Crowne Plaza Hotel Los Angeles Harbor Hotel	601 S Palos Verdes St	San Pedro	90704	33.7383010	-118.2820330	3
60	275	Los Angeles	FZ	Comfort Inn Near Santa Monica Pier	2815 Santa Monica Blvd	Santa Monica	90404	34.0351666	-118.4719971	2
61	276	Los Angeles	FZ	Best Western Gateway Hotel	1920 Santa Monica Blvd	Santa Monica	90404	34.0285234	-118.4800942	3
62	277	Los Angeles	FZ	Travelodge Santa Monica Pico Blvd	3102 Pico Blvd	Santa Monica	90405	34.0259460	-118.4571110	2
63	278	Los Angeles	FZ	Ambrose Hotel	1255 20th St	Santa Monica	91307	34.0303334	-118.4818477	3
64	279	Los Angeles	FZ	Doubletree Guest Suites Santa Monica	1707 4th St	Santa Monica	90401	34.0114610	-118.4889900	3
65	280	Los Angeles	FZ	Travelodge Torrance/Redondo Beach	2448 W Sepulveda Blvd	Torrance	90501	33.8210880	-118.3269700	2
66	281	Los Angeles	FZ	Courtyard by Marriott Torrance Palos Verdes	2633 W Sepulveda Blvd	Torrance	90501	33.8227010	-118.3314556	3
67	282	Los Angeles	FZ	Residence Inn	3701 Torrance Blvd	Torrance	90503	33.8387260	-118.3518580	3
68	283	Los Angeles	FZ	Marriott Torrance South Bay	3635 Fashion Way	Torrance	90503	33.8354160	-118.3501623	3
69	284	Los Angeles	FZ	Staybridge Suites	19901 Prairie Ave	Torrance	90503	33.8504000	-118.3460650	3
70	285	Los Angeles	FZ	Ramada Inn Torrance - South Bay	2880 Pacific Coast Hwy	Torrance	90505	33.7945960	-118.3378410	2
71	286	Los Angeles	FZ	Doubletree Torrance South Bay	21333 Hawthorne Blvd	Torrance	90503	33.8348300	-118.3542790	3
72	287	Los Angeles	FZ	Best Western Plus Avita Suites	3531 Torrance Blvd	Torrance	90503	33.8381180	-118.3480560	3
73	288	Los Angeles	FZ	Holiday Inn Express West Los Angeles	11250 Santa Monica Blvd	West Los Angeles	90025	34.0465740	-118.4473380	3
74	289	Los Angeles	FZ	BEST WESTERN Los Angeles Worldport Hotel	1402 W Pacific Coast Hwy	Wilmington	90803	33.7905820	-118.2830280	2

Table B4. Orange County Hotel Inventory (42 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (26 hotels)										
1	290	Orange	CZ	Ritz Carlton Laguna Niguel	1 Ritz Carlton Dr	Dana Point	92629	33.4765740	-117.7184310	5
2	291	Orange	CZ	Laguna Cliffs Resort	25135 Park Lantern	Dana Point	92629	33.4644157	-117.6914521	4
3	292	Orange	CZ	Best Western Plus Dana Point Inn By The Sea	34744 Coast Hwy	Dana Point	92624	33.4577300	-117.6705530	3
4	293	Orange	CZ	Doubletree Doheny Beach	34402 Pacific Coast Hwy	Dana Point	92629	33.4638270	-117.6816590	3
5	294	Orange	CZ	Best Western Plus Marina Shores Hotel	34280 Pacific Coast Hwy	Dana Point	92629	33.4658350	-117.6894270	3
6	295	Orange	CZ	St Regis Monarch Beach	1 Monarch Beach Resort N	Dana Point	92629	33.4822260	-117.7151730	5
7	296	Orange	CZ	BEST WESTERN Huntington Beach Inn	800 Pacific Coast Hwy	Huntington Beach	92648	33.6597944	-118.0052465	2
8	297	Orange	CZ	Hilton Waterfront Beach Resort	21100 Pacific Coast Hwy	Huntington Beach	92648	33.6532930	-117.9944030	4
9	298	Orange	CZ	Hyatt Regency Huntington Beach & Spa	21500 Pacific Coast Hwy	Huntington Beach	92648	33.6508470	-117.9903820	4
10	299	Orange	CZ	Best Western Laguna Brisas Spa	1600 S Coast Hwy	Laguna Beach	92651	33.5299868	-117.7724622	3
11	300	Orange	CZ	Surf and Sand Resort	1555 S Coast Hwy	Laguna Beach	92651	33.5303591	-117.7731664	4
12	301	Orange	CZ	Laguna Cliffs Inn	475 N Coast Hwy	Laguna Beach	92651	33.5448478	-117.7914419	3
13	302	Orange	CZ	Holiday Inn Laguna Beach	696 S Coast Hwy	Laguna Beach	92651	33.5380330	-117.7794000	3
14	303	Orange	CZ	Montage Laguna Beach	30801 S Coast Hwy	Laguna Beach	92651	33.5151530	-117.7570210	5
15	304	Orange	CZ	Hyatt Regency Newport Beach	1107 Jamboree Rd	Newport Beach	92660	33.6167331	-117.8879333	3
16	305	Orange	CZ	Newport Beach Marriott Bayview	500 Bayview Cir	Newport Beach	92660	33.6536018	-117.8681731	3
17	306	Orange	CZ	Newport Channel Inn	6030 West Coast Hwy	Newport Beach	92663	33.6258907	-117.9480626	2

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
18	307	Orange	CZ	Best Western Newport Beach Inn	6208 West Coast Hwy	Newport Beach	92663	33.6266580	-117.9493150	3
19	308	Orange	CZ	The Balboa Bay Club and Resort	1221 West Coast Hwy	Newport Beach	92663	33.6154726	-117.9143447	4
20	309	Orange	CZ	Bay Shores Peninsula Hotel	1800 W Balboa Blvd	Newport Beach	92663	33.6078950	-117.9251630	3
21	310	Orange	CZ	Pelican Hill Resort	22701 Pelican Hill Rd S	Newport Coast	92648	33.5868370	-117.8430420	5
22	311	Orange	CZ	Best Western Casablanca Inn	1601 N El Camino Real	San Clemente	92672	33.4328790	-117.6281340	2
23	312	Orange	CZ	Rodeway Inn San Clemente Beach	1301 N El Camino Real	San Clemente	92672	33.4322310	-117.6228010	2
24	313	Orange	CZ	Pacific Inn	600 Marina Dr	Seal Beach	90740	33.7449834	-118.1058175	3
25	314	Orange	CZ	Hampton Inn and Suites	2401 Seal Beach Blvd	Seal Beach	90740	33.7589180	-118.0814560	3
26	315	Orange	CZ	Best Western Harbour Inn & Suites	16912 Pacific Coast Hwy	Sunset Beach	90742	33.7164460	-118.0681290	3
Outside Coastal Zone, Inside Five-Mile Zone (16 hotels)										
1	316	Orange	FZ	Super 8 Costa Mesa Newport Beach	2645 Harbor Blvd	Costa Mesa	92626	33.6692910	-117.9201000	2
2	317	Orange	FZ	Best Western Newport Mesa Inn	2642 Newport Blvd	Costa Mesa	92627	33.6636840	-117.8954220	3
3	318	Orange	FZ	Travelodge Costa Mesa Newport Beach	1951 Costa Mesa Fwy	Costa Mesa	92627	33.6557417	-117.9050645	2
4	319	Orange	FZ	Ramada Inn and Suites Costa Mesa/Newport Beach	1680 Superior Ave	Costa Mesa	92627	33.6356133	-117.9240199	3
5	320	Orange	FZ	Holiday Inn Express Hotel & Suites Costa Mesa	2070 Costa Mesa Fwy	Costa Mesa	92627	33.6477301	-117.9124861	3
6	321	Orange	FZ	BLVD Hotel	2430 Newport Blvd	Costa Mesa	92627	33.6577080	-117.9015190	3
7	322	Orange	FZ	Best Western Regency Inn	19360 Beach Blvd	Huntington Beach	92646	33.6812045	-117.9885597	3
8	323	Orange	FZ	Howard Johnson Huntington Beach	17251 Beach Blvd	Huntington Beach	92647	33.7118820	-117.9894330	2
9	324	Orange	FZ	Comfort Suites Huntington Beach	16301 Beach Blvd	Huntington Beach	92647	33.7258490	-117.9894660	2
10	325	Orange	FZ	The Island Hotel	690 Newport Center Dr	Newport Beach	92660	33.6193350	-117.8756692	5
11	326	Orange	FZ	Holiday Inn Express San Clemente	35 Via Pico Plaza	San Clemente	92672	33.4353990	-117.6189420	3
12	327	Orange	FZ	Hampton Inn and Suites	2481 S El Camino Real	San Clemente	92672	33.4102600	-117.5998930	3
13	328	Orange	FZ	San Clemente Beach Travelodge	2441 S El Camino Real	San Clemente	92672	33.4108708	-117.6002653	2
14	329	Orange	FZ	Best Western Capistrano Inn	27174 Ortega Hwy	San Juan Capistrano	92675	33.5019800	-117.6564860	3
15	330	Orange	FZ	Residence Inn Dana Point San Juan Capistrano	33711 Camino Capistrano	San Juan Capistrano	92675	33.4732370	-117.6765260	3
16	331	Orange	FZ	Best Western Westminster Inn	5755 Westminster Blvd	Westminster	92683	33.7591023	-118.0286926	2

Table B5. Los Angeles County and Orange County Hotel Inventory (143 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (53 hotels)										
1	189	Los Angeles	CZ	Beach House Hotel Hermosa Beach	1300 The Strand	Hermosa Beach	90254	33.8626163	-118.4019475	3
2	190	Los Angeles	CZ	Hyatt Regency Long Beach	200 S Pine Ave	Long Beach	90802	33.7635248	-118.1914638	4
3	191	Los Angeles	CZ	RI Long Beach Downtown	600 Queensway Dr	Long Beach	90802	33.7587510	-118.2013113	3
4	192	Los Angeles	CZ	Best Western Golden Sails Htl	6285 E Pacific Coast Hwy	Long Beach	90803	33.7656980	-118.1156440	2
5	193	Los Angeles	CZ	Doubletree Hotel Maya	700 Queensway Dr	Long Beach	90802	33.7571330	-118.1985300	3
6	194	Los Angeles	CZ	Hyatt The Pike Long Beach	285 Bay St	Long Beach	90802	33.7649970	-118.1946570	3
7	195	Los Angeles	CZ	The Inn at Venice Beach	327 Washington Blvd	Marina Del Rey	90292	33.9808303	-118.4641381	3
8	196	Los Angeles	CZ	Marina Del Rey Marriott	4100 Admiralty Way	Marina Del Rey	90292	33.9820510	-118.4595250	3
9	197	Los Angeles	CZ	The Ritz Carlton, Marina Del Rey	4375 Admiralty Way	Marina Del Rey	90292	33.9847217	-118.4505725	5
10	198	Los Angeles	CZ	DoubleTree Hotel MDR Marina Del Rey	13480 Maxella Ave	Marina Del Rey	90292	33.9851010	-118.4410280	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
11	199	Los Angeles	CZ	Hilton Garden Inn Marina Del Rey	4200 Admiralty Way	Marina Del Rey	90292	33.9836080	-118.4572140	3
12	200	Los Angeles	CZ	Terranea Resort	100 Terranea Way	Rancho Palos Verdes	90275	33.7384620	-118.3978690	4
13	201	Los Angeles	CZ	The Portofino Hotel and Yacht Club - A Noble House Hotel	260 Portofino Way	Redondo Beach	90277	33.8443997	-118.3966112	3
14	202	Los Angeles	CZ	Crowne Plaza Hotel Redondo Beach and Marina	300 N Harbor Dr	Redondo Beach	90277	33.8454585	-118.3928619	3
15	203	Los Angeles	CZ	Ramada Limited Redondo Beach	435 S Pacific Coast Hwy	Redondo Beach	90277	33.8353422	-118.3853403	2
16	204	Los Angeles	CZ	The Huntley Hotel	1111 2nd St	Santa Monica	90401	34.0187223	-118.5010592	3
17	205	Los Angeles	CZ	Viceroy Santa Monica	1819 Ocean Ave	Santa Monica	90401	34.0079333	-118.4907767	3
18	206	Los Angeles	CZ	Shangri-La Hotel	1301 Ocean Ave	Santa Monica	90401	34.0154272	-118.4993043	3
19	207	Los Angeles	CZ	Loews Santa Monica Beach Hotel	1700 Ocean Ave	Santa Monica	90401	34.0091184	-118.4930376	4
20	208	Los Angeles	CZ	JW Marriott Santa Monica Le Merigot	1740 Ocean Ave	Santa Monica	90401	34.0084910	-118.4924020	4
21	209	Los Angeles	CZ	Oceana Santa Monica	849 Ocean Ave	Santa Monica	90403	34.0213830	-118.5059580	3
22	210	Los Angeles	CZ	Wyndham Santa Monica Beach @ The Pier	120 Colorado Ave	Santa Monica	90401	34.0118320	-118.4941630	3
23	211	Los Angeles	CZ	Fairmont Miramar	101 Wilshire Blvd	Santa Monica	90401	34.0179160	-118.5016220	4
24	212	Los Angeles	CZ	Georgian Hotel	1415 Ocean Ave	Santa Monica	90401	34.0136710	-118.4973510	3
25	213	Los Angeles	CZ	Ocean View Hotel	1447 Ocean Ave	Santa Monica	90401	34.0131740	-118.4965600	2
26	214	Los Angeles	CZ	Shore Hotel	1515 Ocean Ave	Santa Monica	90401	34.0127100	-118.4956390	4
27	215	Los Angeles	CZ	Le Meridien Delfina Santa Monica	530 Pico Blvd	Santa Monica	90405	34.0107850	-118.4853660	4
28	290	Orange	CZ	Ritz Carlton Laguna Niguel	1 Ritz Carlton Dr	Dana Point	92629	33.4765740	-117.7184310	5
29	291	Orange	CZ	Laguna Cliffs Resort	25135 Park Lantern	Dana Point	92629	33.4644157	-117.6914521	4
30	292	Orange	CZ	Best Western Plus Dana Point Inn By The Sea	34744 Coast Hwy	Dana Point	92624	33.4577300	-117.6705530	3
31	293	Orange	CZ	Doubletree Doheny Beach	34402 Pacific Coast Hwy	Dana Point	92629	33.4638270	-117.6816590	3
32	294	Orange	CZ	Best Western Plus Marina Shores Hotel	34280 Pacific Coast Hwy	Dana Point	92629	33.4658350	-117.6894270	3
33	295	Orange	CZ	St Regis Monarch Beach	1 Monarch Beach Resort N	Dana Point	92629	33.4822260	-117.7151730	5
34	296	Orange	CZ	BEST WESTERN Huntington Beach Inn	800 Pacific Coast Hwy	Huntington Beach	92648	33.6597944	-118.0052465	2
35	297	Orange	CZ	Hilton Waterfront Beach Resort	21100 Pacific Coast Hwy	Huntington Beach	92648	33.6532930	-117.9944030	4
36	298	Orange	CZ	Hyatt Regency Huntington Beach & Spa	21500 Pacific Coast Hwy	Huntington Beach	92648	33.6508470	-117.9903820	4
37	299	Orange	CZ	Best Western Laguna Brisas Spa	1600 S Coast Hwy	Laguna Beach	92651	33.5299868	-117.7724622	3
38	300	Orange	CZ	Surf and Sand Resort	1555 S Coast Hwy	Laguna Beach	92651	33.5303591	-117.7731664	4
39	301	Orange	CZ	Laguna Cliffs Inn	475 N Coast Hwy	Laguna Beach	92651	33.5448478	-117.7914419	3
40	302	Orange	CZ	Holiday Inn Laguna Beach	696 S Coast Hwy	Laguna Beach	92651	33.5380330	-117.7794000	3
41	303	Orange	CZ	Montage Laguna Beach	30801 S Coast Hwy	Laguna Beach	92651	33.5151530	-117.7570210	5
42	304	Orange	CZ	Hyatt Regency Newport Beach	1107 Jamboree Rd	Newport Beach	92660	33.6167331	-117.8879333	3
43	305	Orange	CZ	Newport Beach Marriott Bayview	500 Bayview Cir	Newport Beach	92660	33.6536018	-117.8681731	3
44	306	Orange	CZ	Newport Channel Inn	6030 West Coast Hwy	Newport Beach	92663	33.6258907	-117.9480626	2
45	307	Orange	CZ	Best Western Newport Beach Inn	6208 West Coast Hwy	Newport Beach	92663	33.6266580	-117.9493150	3
46	308	Orange	CZ	The Balboa Bay Club and Resort	1221 West Coast Hwy	Newport Beach	92663	33.6154726	-117.9143447	4
47	309	Orange	CZ	Bay Shores Peninsula Hotel	1800 W Balboa Blvd	Newport Beach	92663	33.6078950	-117.9251630	3
48	310	Orange	CZ	Pelican Hill Resort	22701 Pelican Hill Rd S	Newport Coast	92648	33.5868370	-117.8430420	5

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
49	311	Orange	CZ	Best Western Casablanca Inn	1601 N El Camino Real	San Clemente	92672	33.4328790	-117.6281340	2
50	312	Orange	CZ	Rodeway Inn San Clemente Beach	1301 N El Camino Real	San Clemente	92672	33.4322310	-117.6228010	2
51	313	Orange	CZ	Pacific Inn	600 Marina Dr	Seal Beach	90740	33.7449834	-118.1058175	3
52	314	Orange	CZ	Hampton Inn and Suites	2401 Seal Beach Blvd	Seal Beach	90740	33.7589180	-118.0814560	3
53	315	Orange	CZ	Best Western Harbour Inn & Suites	16912 Pacific Coast Hwy	Sunset Beach	90742	33.7164460	-118.0681290	3
Outside Coastal Zone, Inside Five-Mile Zone (90 hotels)										
1	216	Los Angeles	FZ	Four Points by Sheraton Los Angeles Westside	5990 Green Valley Cir	Culver City	90230	33.9838010	-118.3938540	3
2	217	Los Angeles	FZ	Travelodge Los Angeles Culver City	11180 Washington Pl	Culver City	90232	34.0089013	-118.4134370	2
3	218	Los Angeles	FZ	Doubletree by Hilton Hotel Los Angeles International Airport	1985 E Grand Ave	El Segundo	90245	33.9198460	-118.3920390	3
4	219	Los Angeles	FZ	Embassy Stes Lax South	1440 E Imperial Ave	El Segundo	90245	33.9305740	-118.4007440	3
5	220	Los Angeles	FZ	Courtyard by Marriott Los Angeles LAX El Segundo	2000 E Mariposa Ave	El Segundo	90245	33.9230480	-118.3914590	3
6	221	Los Angeles	FZ	Hilton Garden Inn LAX El Segundo	2100 E Mariposa Ave	El Segundo	90245	33.9230230	-118.3883270	3
7	222	Los Angeles	FZ	Residence Inn by Marriott El Segundo	2135 E El Segundo Blvd	El Segundo	90245	33.9166190	-118.3887580	3
8	223	Los Angeles	FZ	Extended Stay America Los Angeles LAX Airport El Segundo	1910 E Mariposa Ave	El Segundo	90245	33.9235690	-118.3946800	2
9	224	Los Angeles	FZ	Hyatt Place Los Angeles LAX El Segundo	750 N Nash St	El Segundo	90245	33.9262100	-118.3871810	3
10	225	Los Angeles	FZ	Springhill Suites by Marriott Manhattan Beach	14620 Aviation Blvd	Hawthorne	90250	33.8986850	-118.3780930	3
11	226	Los Angeles	FZ	Towneplace Suites by Marriott Los Angeles LAX/Manhattan Beach	14400 Aviation Blvd	Hawthorne	90260	33.9009600	-118.3780790	2
12	227	Los Angeles	FZ	Hampton Inn Los Angeles International Airport Hawthorne	11430 Acacia Ave.	Hawthorne	90250	33.9306680	-118.3506600	3
13	228	Los Angeles	FZ	Quality Inn & Suites Hermosa Beach	901 Aviation Blvd	Hermosa Beach	90254	33.8633567	-118.3911203	3
14	229	Los Angeles	FZ	Holiday Inn Express Hotel & Suites Hermosa Beach	125 Pacific Coast Hwy	Hermosa Beach	90254	33.8553203	-118.3906196	3
15	230	Los Angeles	FZ	Hampton Inn and Suites	1530 Pacific Coast Hwy	Hermosa Beach	90254	33.8658448	-118.3933275	3
16	231	Los Angeles	FZ	Wingate by Wyndham Los Angeles International Airport LAX	10300 S La Cienega Blvd	Inglewood	90304	33.9423811	-118.3699051	3
17	232	Los Angeles	FZ	Best Western South Bay Hotel	15000 Hawthorne Blvd	Lawndale	90260	33.8952471	-118.3522186	3
18	233	Los Angeles	FZ	Days Inn LAX Airport South Bay - Lawndale	15636 Hawthorne Blvd	Lawndale	90260	33.8886130	-118.3517860	2
19	234	Los Angeles	FZ	Renaissance Long Beach Hotel	111 E Ocean Blvd	Long Beach	90704	33.7593626	-118.2416893	3
20	235	Los Angeles	FZ	Holiday Inn Hotel Long Beach (Dwtin Area)	1133 Atlantic Ave	Long Beach	90704	33.7816303	-118.1851716	3
21	236	Los Angeles	FZ	Holiday Inn Hotel Long Beach-Airport (Conf Ctr)	2640 N Lakewood Blvd	Long Beach	90706	33.8034610	-118.1425580	3
22	237	Los Angeles	FZ	Comfort Inn & Suites Near Long Beach Conv Center	200 E Willow St	Long Beach	90706	33.8042468	-118.1908723	3
23	238	Los Angeles	FZ	Travelodge Long Beach Convention Center	80 Atlantic Ave	Long Beach	90802	33.7677371	-118.1850264	2
24	239	Los Angeles	FZ	Best Western of Long Beach	1725 Long Beach Blvd	Long Beach	90813	33.7887500	-118.1899050	2
25	240	Los Angeles	FZ	RI LONG BEACH	4111 E Willow St	Long Beach	90815	33.8035829	-118.1443800	3
26	241	Los Angeles	FZ	Marriott Long Beach Airport	4700 Airport Plaza Dr	Long Beach	90815	33.8115480	-118.1383780	3
27	242	Los Angeles	FZ	Extended Stay America Los Angeles - Long Beach Airport	4105 E Willow St	Long Beach	90815	33.8043260	-118.1463940	2
28	243	Los Angeles	FZ	Quality Inn Long Beach Airport	3201 E Pacific Coast Hwy	Long Beach	90755	33.7903280	-118.1543320	2
29	244	Los Angeles	FZ	Courtyard Long Beach Downtown	500 E 1st St	Long Beach	90802	33.7676010	-118.1856180	3
30	245	Los Angeles	FZ	Hotel Current	5325 Pacific Coast Hwy	Long Beach	90804	33.7814680	-118.1303120	3
31	246	Los Angeles	FZ	Holiday Inn Lax	9901 S La Cienega Blvd	Los Angeles	90045	33.9462250	-118.3711880	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
32	247	Los Angeles	FZ	Sheraton	6101 W Century Blvd	Los Angeles	90045	33.9465310	-118.3907800	3
33	248	Los Angeles	FZ	Crowne Plaza Hotel Los Angeles-Intl Airport	5985 W Century Blvd	Los Angeles	90045	33.9461664	-118.3888496	3
34	249	Los Angeles	FZ	La Quinta Inn & Suites Lax	5249 W Century Blvd	Los Angeles	90045	33.9455416	-118.3719777	3
35	250	Los Angeles	FZ	Radisson Hotel at Los Angeles Airport	6225 W Century Blvd	Los Angeles	90045	33.9458500	-118.3950740	3
36	251	Los Angeles	FZ	Four Points by Sheraton Los Angeles International Airport	9750 Airport Blvd	Los Angeles	90045	33.9476210	-118.3850643	3
37	252	Los Angeles	FZ	Embassy Suites LAX North	9801 Airport Blvd	Los Angeles	90045	33.9469520	-118.3865090	3
38	253	Los Angeles	FZ	Super8 - Los Angeles International Airport Hotel	9250 Airport Blvd	Los Angeles	90045	33.9517758	-118.3857294	2
39	254	Los Angeles	FZ	Renaissance Los Angeles Airport Hotel	9620 Airport Blvd	Los Angeles	90045	33.9491980	-118.3852390	3
40	255	Los Angeles	FZ	Courtyard by Marriott Los Angeles Century Boulevard	6161 W Century Blvd	Los Angeles	90045	33.9467100	-118.3934150	3
41	256	Los Angeles	FZ	Extended Stay America Los Angeles - LAX Airport	6531 S Sepulveda Blvd	Los Angeles	90045	33.9798020	-118.3952220	2
42	257	Los Angeles	FZ	Hotel Angeleno - A Joie De Vivre Hotel	170 N Church Ln	Los Angeles	90049	34.0736528	-118.4681940	3
43	258	Los Angeles	FZ	Best Western Royal Palace Inn	2528 S Sepulveda Blvd	Los Angeles	90064	34.0342872	-118.4333214	3
44	259	Los Angeles	FZ	Super 8 Los Angeles Culver City	12664 Washington Blvd	Los Angeles	90066	33.9968273	-118.4338681	2
45	260	Los Angeles	FZ	Rodeway Inn Culver City	11933 Washington Blvd	Los Angeles	90066	33.9979704	-118.4207488	2
46	261	Los Angeles	FZ	Luxe City Center Hotel	1020 S Figueroa St	Los Angeles	90704	33.7831215	-118.2803158	4
47	262	Los Angeles	FZ	Marriott Los Angeles Airport	5855 W Century Blvd	Los Angeles	90045	33.9466180	-118.3846890	3
48	263	Los Angeles	FZ	Hilton Los Angeles Airport	5711 W Century Blvd	Los Angeles	90045	33.9460270	-118.3816610	3
49	264	Los Angeles	FZ	Westin Los Angeles Airport	5400 W Century Blvd	Los Angeles	90045	33.9446220	-118.3741430	3
50	265	Los Angeles	FZ	Luxe Hotel Sunset Boulevard	11461 Sunset Blvd	Los Angeles	90049	34.0724580	-118.4683240	3
51	266	Los Angeles	FZ	Marriott Manhattan Beach	1400 Parkview Ave	Manhattan Beach	90266	33.9001180	-118.3882440	3
52	267	Los Angeles	FZ	Residence Inn-Lax	1700 N Sepulveda Blvd	Manhattan Beach	90266	33.8903210	-118.3958520	3
53	268	Los Angeles	FZ	Hawthorn Suites	1817 N Sepulveda Blvd	Manhattan Beach	90266	33.8920444	-118.3961056	3
54	269	Los Angeles	FZ	The Belamar Hotel	3501 N Sepulveda Blvd	Manhattan Beach	90266	33.9005810	-118.3967820	3
55	270	Los Angeles	FZ	Best Western Redondo Beach Inn	1850 S Pacific Coast Hwy	Redondo Beach	90277	33.8164670	-118.3790855	3
56	271	Los Angeles	FZ	Best Western Redondo Beach	2740 Artesia Blvd	Redondo Beach	90278	33.8724200	-118.3597140	2
57	272	Los Angeles	FZ	Residence Inn Los Angeles Redondo Beach	2420 Marine Ave.	Redondo Beach, CA	90278	33.8929910	-118.3655320	3
58	273	Los Angeles	FZ	Hilton Garden Inn Los Angeles Redondo Beach	2410 Marine Ave.	Redondo Beach, CA	90278	33.8938200	-118.3665990	3
59	274	Los Angeles	FZ	Crowne Plaza Hotel Los Angeles Harbor Hotel	601 S Palos Verdes St	San Pedro	90704	33.7383010	-118.2820330	3
60	275	Los Angeles	FZ	Comfort Inn Near Santa Monica Pier	2815 Santa Monica Blvd	Santa Monica	90404	34.0351666	-118.4719971	2
61	276	Los Angeles	FZ	Best Western Gateway Hotel	1920 Santa Monica Blvd	Santa Monica	90404	34.0285234	-118.4800942	3
62	277	Los Angeles	FZ	Travelodge Santa Monica Pico Blvd	3102 Pico Blvd	Santa Monica	90405	34.0259460	-118.4571110	2
63	278	Los Angeles	FZ	Ambrose Hotel	1255 20th St	Santa Monica	91307	34.0303334	-118.4818477	3
64	279	Los Angeles	FZ	Doubletree Guest Suites Santa Monica	1707 4th St	Santa Monica	90401	34.0114610	-118.4889900	3
65	280	Los Angeles	FZ	Travelodge Torrance/Redondo Beach	2448 W Sepulveda Blvd	Torrance	90501	33.8210880	-118.3269700	2
66	281	Los Angeles	FZ	Courtyard by Marriott Torrance Palos Verdes	2633 W Sepulveda Blvd	Torrance	90501	33.8227010	-118.3314556	3

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
67	282	Los Angeles	FZ	Residence Inn	3701 Torrance Blvd	Torrance	90503	33.8387260	-118.3518580	3
68	283	Los Angeles	FZ	Marriott Torrance South Bay	3635 Fashion Way	Torrance	90503	33.8354160	-118.3501623	3
69	284	Los Angeles	FZ	Staybridge Suites	19901 Prairie Ave	Torrance	90503	33.8504000	-118.3460650	3
70	285	Los Angeles	FZ	Ramada Inn Torrance - South Bay	2880 Pacific Coast Hwy	Torrance	90505	33.7945960	-118.3378410	2
71	286	Los Angeles	FZ	Doubletree Torrance South Bay	21333 Hawthorne Blvd	Torrance	90503	33.8348300	-118.3542790	3
72	287	Los Angeles	FZ	Best Western Plus Avita Suites	3531 Torrance Blvd	Torrance	90503	33.8381180	-118.3480560	3
73	288	Los Angeles	FZ	Holiday Inn Express West Los Angeles	11250 Santa Monica Blvd	West Los Angeles	90025	34.0465740	-118.4473380	3
74	289	Los Angeles	FZ	BEST WESTERN Los Angeles Worldport Hotel	1402 W Pacific Coast Hwy	Wilmington	90803	33.7905820	-118.2830280	2
75	316	Orange	FZ	Super 8 Costa Mesa Newport Beach	2645 Harbor Blvd	Costa Mesa	92626	33.6692910	-117.9201000	2
76	317	Orange	FZ	Best Western Newport Mesa Inn	2642 Newport Blvd	Costa Mesa	92627	33.6636840	-117.8954220	3
77	318	Orange	FZ	Travelodge Costa Mesa Newport Beach	1951 Costa Mesa Fwy	Costa Mesa	92627	33.6557417	-117.9050645	2
78	319	Orange	FZ	Ramada Inn and Suites Costa Mesa/Newport Beach	1680 Superior Ave	Costa Mesa	92627	33.6356133	-117.9240199	3
79	320	Orange	FZ	Holiday Inn Express Hotel & Suites Costa Mesa	2070 Costa Mesa Fwy	Costa Mesa	92627	33.6477301	-117.9124861	3
80	321	Orange	FZ	BLVD Hotel	2430 Newport Blvd	Costa Mesa	92627	33.6577080	-117.9015190	3
81	322	Orange	FZ	Best Western Regency Inn	19360 Beach Blvd	Huntington Beach	92646	33.6812045	-117.9885597	3
82	323	Orange	FZ	Howard Johnson Huntington Beach	17251 Beach Blvd	Huntington Beach	92647	33.7118820	-117.9894330	2
83	324	Orange	FZ	Comfort Suites Huntington Beach	16301 Beach Blvd	Huntington Beach	92647	33.7258490	-117.9894660	2
84	325	Orange	FZ	The Island Hotel	690 Newport Center Dr	Newport Beach	92660	33.6193350	-117.8756692	5
85	326	Orange	FZ	Holiday Inn Express San Clemente	35 Via Pico Plaza	San Clemente	92672	33.4353990	-117.6189420	3
86	327	Orange	FZ	Hampton Inn and Suites	2481 S El Camino Real	San Clemente	92672	33.4102600	-117.5998930	3
87	328	Orange	FZ	San Clemente Beach Travelodge	2441 S El Camino Real	San Clemente	92672	33.4108708	-117.6002653	2
88	329	Orange	FZ	Best Western Capistrano Inn	27174 Ortega Hwy	San Juan Capistrano	92675	33.5019800	-117.6564860	3
89	330	Orange	FZ	Residence Inn Dana Point San Juan Capistrano	33711 Camino Capistrano	San Juan Capistrano	92675	33.4732370	-117.6765260	3
90	331	Orange	FZ	Best Western Westminster Inn	5755 Westminster Blvd	Westminster	92683	33.7591023	-118.0286926	2

B3. Hotel Maps

Figures B1 through B3 show maps of Coastal Zone and Five-Mile Zone hotels for the City of Long Beach, Los Angeles County, and Orange County. The hotels presented in these maps include all AAA-rated and non-AAA-rated hotels. The maps do not include new hotels added from the September 24, 2015 STR participation list of new hotels participating in STR surveys since January 1, 2014. The mapping process for the new hotels is explained in Chapter 5 and a listing of these hotels is provided in Appendix D.

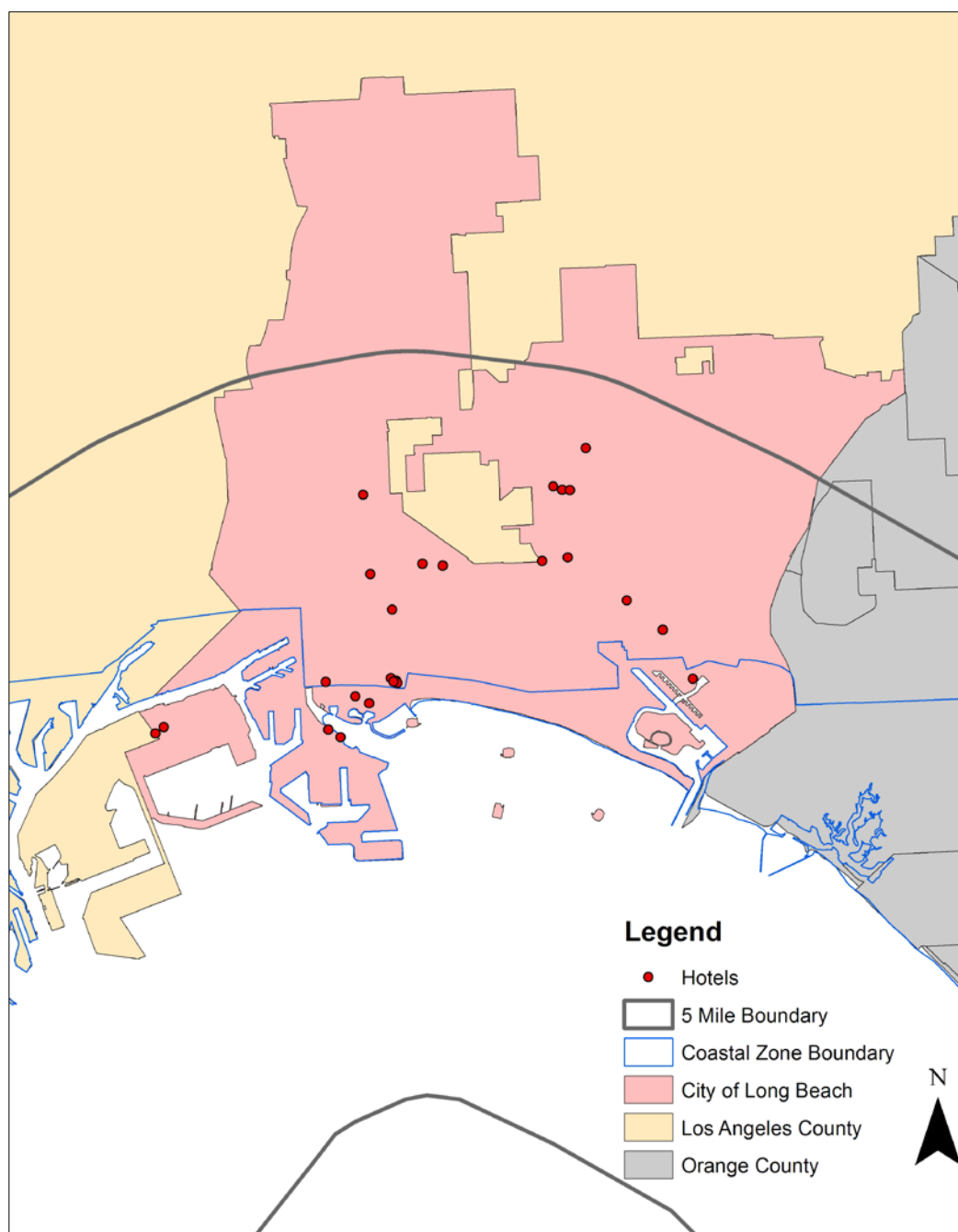


Figure B1. City of Long Beach Hotel Map

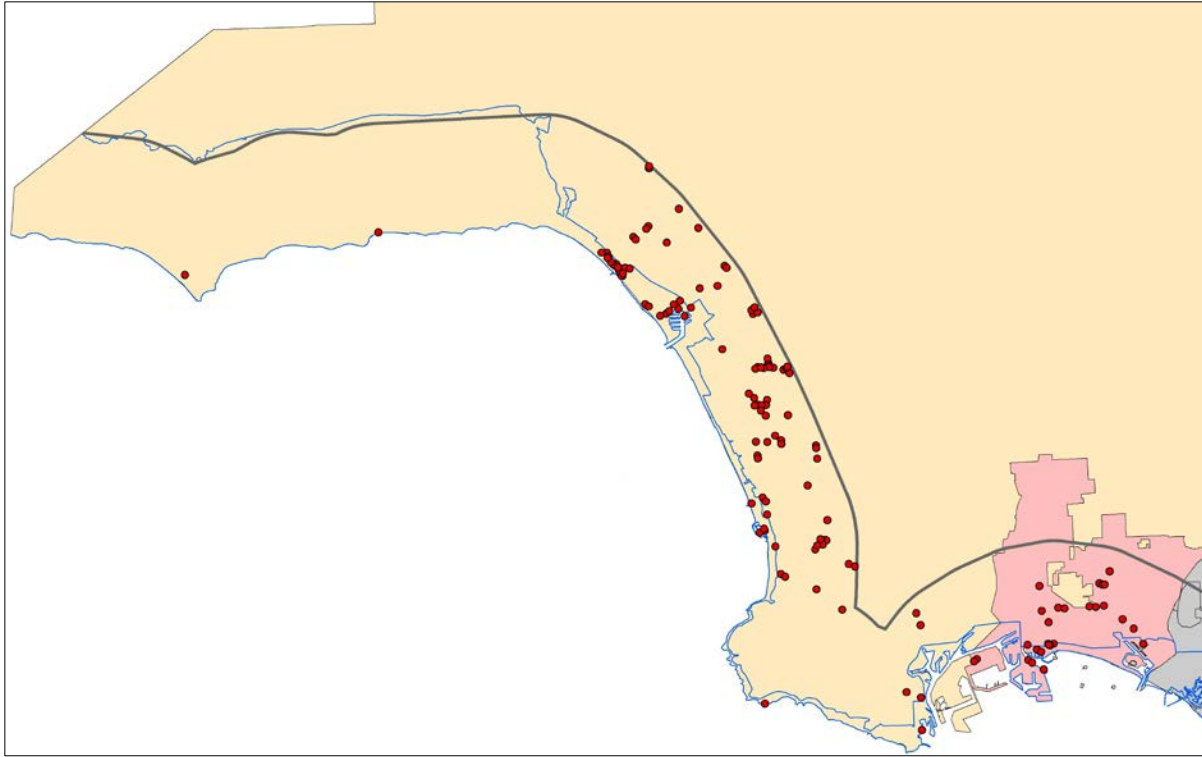


Figure B2. Los Angeles County Hotel Map

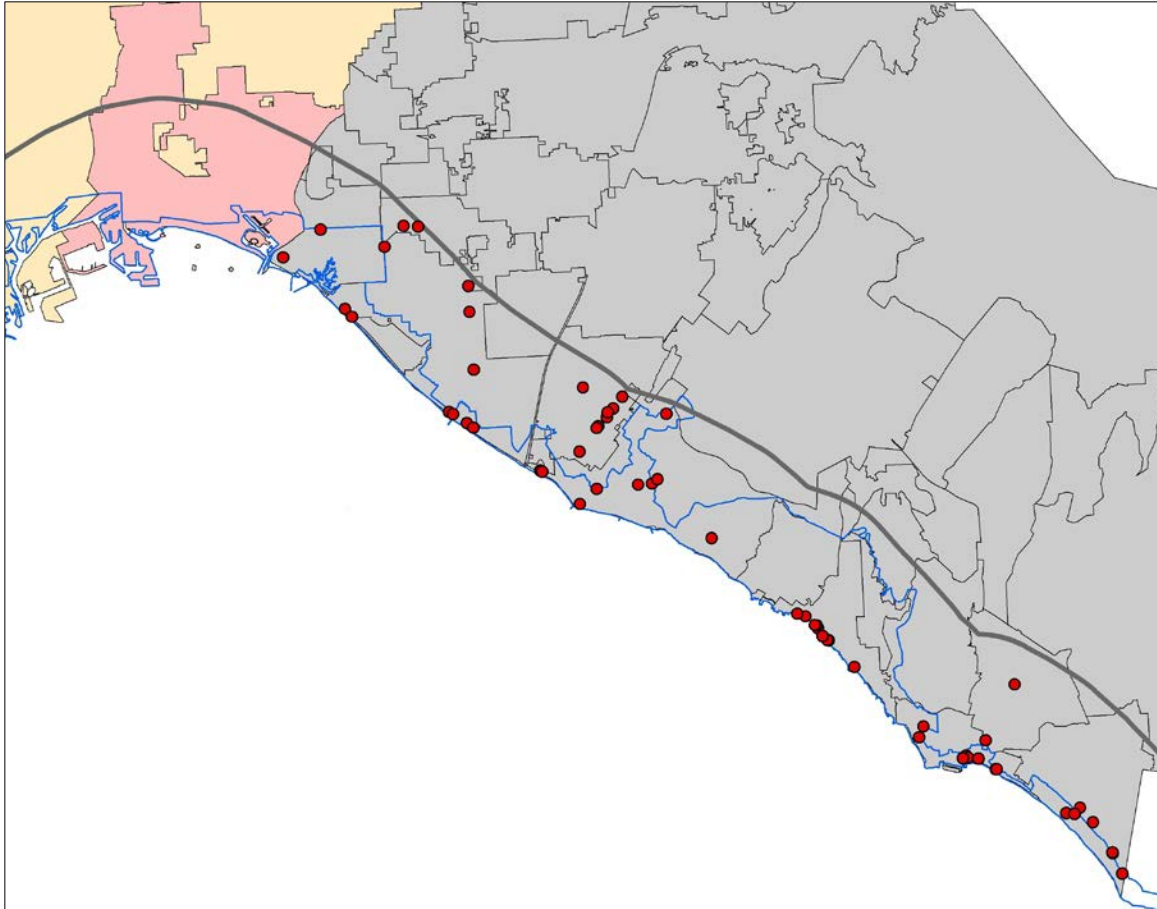


Figure B3. Orange County Hotel Map

Appendix C. AAA Hotel Ratings: Counts and Percentages

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C1. Introduction

Appendix C presents AAA rating counts and percentages for the all inventories, except California Statewide, studied in Chapter 5. For reasons explained in Chapter 5, California Statewide ADR findings were not limited to AAA-rated hotels. The tables below present counts and percentages of AAA-rated versus non-AAA-rated hotels as well as the diamond ratings (one, two, three, four, five, or not rated (NR)).

C2. AAA Rating Counts

C2.1. AAA-rated and Non-AAA-rated Hotel Counts

Table C1. Inventory AAA-rated and Non-AAA-rated Hotel Counts

Area	Coastal Zone			Out Coastal Zone, In Five-mile Zone			Five-mile Zone (Total)		
	AAA	Non- AAA	Total	AAA	Non- AAA	Total	AAA	Non- AAA	Total
California Coastal Counties	228	87	315	243	115	358	471	202	673
City of Long Beach	5	1	6	12	9	21	17	10	27
Los Angeles County	27	16	43	74	25	99	101	41	142
Orange County	26	8	34	16	6	22	42	14	56
Los Angeles County and Orange County	53	24	77	90	31	121	143	55	198

Table C2. California Coastal County AAA-rated and Non-AAA-rated Hotel Counts

Area (Counties from North to South)	Coastal Zone			Out Coastal Zone, In Five-mile Zone			Five-mile Zone (Total)		
	AAA	Non- AAA	Total	AAA	Non- AAA	Total	AAA	Non- AAA	Total
Del Norte	2	1	3	1	2	3	3	3	6
Humboldt	4	3	7	9	5	14	13	8	21
Mendocino	2	1	3	1	1	2	3	2	5
Sonoma	1	3	4	0	0	0	1	3	4
Marin	0	0	0	5	4	9	5	4	9
San Francisco	0	1	1	10	4	14	10	5	15
San Mateo	7	0	7	1	1	2	8	1	9
Santa Cruz	7	4	11	13	2	15	20	6	26
Monterey	26	5	31	26	15	41	52	20	72
San Luis Obispo	34	7	41	3	1	4	37	8	45
Santa Barbara	8	10	18	14	7	21	22	17	39
Ventura	11	1	12	3	1	4	14	2	16
Los Angeles	27	16	43	74	25	99	101	41	142
Orange	26	8	34	16	6	22	42	14	56
San Diego	73	27	100	67	41	108	140	68	208
Total	228	87	315	243	115	358	471	202	673

C2.2. AAA Diamond Rating Counts

Table C3. Inventory Coastal Zone AAA Diamond Rating Counts

Area	Coastal Zone							Out Coastal Zone, In Five-mile Zone							Five-mile Zone (Total)						
	1	2	3	4	5	NR	Total	1	2	3	4	5	NR	Total	1	2	3	4	5	NR	Total
California Coastal Counties	1	44	140	36	7	87	315	0	70	157	14	2	115	358	1	114	297	50	9	202	673
City of Long Beach	0	1	3	1	0	1	6	0	4	8	0	0	9	21	0	5	10	1	0	10	26
Los Angeles County	0	3	16	7	1	16	43	0	18	55	1	0	25	99	0	21	71	8	1	41	142
Orange County	0	4	13	5	4	8	34	0	6	9	0	1	6	22	0	10	22	5	5	14	56
Los Angeles County and Orange County	0	7	29	12	5	24	77	0	24	64	1	1	31	121	0	31	93	13	6	55	198

Table C4. California Coastal Counties Coastal Zone AAA Diamond Rating Counts

Area (Counties from North to South)	Coastal Zone							Out Coastal Zone, In Five-mile Zone							Five-mile Zone (Total)						
	1	2	3	4	5	NR	Total	1	2	3	4	5	NR	Total	1	2	3	4	5	NR	Total
Del Norte	0	0	2	0	0	1	3	0	1	0	0	0	2	3	0	1	2	0	0	3	6
Humboldt	0	2	2	0	0	3	7	0	5	4	0	0	5	14	0	7	6	0	0	8	21
Mendocino	0	1	1	0	0	1	3	0	1	0	0	0	1	2	0	2	1	0	0	2	5
Sonoma	0	0	0	1	0	3	4	0	0	0	0	0	0	0	0	0	0	1	0	3	4
Marin	0	0	0	0	0	0	0	0	0	5	0	0	4	9	0	0	5	0	0	4	9
San Francisco	0	0	0	0	0	1	1	0	6	4	0	0	4	14	0	6	4	0	0	5	15
San Mateo	0	0	5	2	0	0	7	0	0	1	0	0	1	2	0	0	6	2	0	1	9
Santa Cruz	0	4	2	1	0	4	11	0	5	7	1	0	2	15	0	9	9	2	0	6	26
Monterey	1	5	13	7	0	5	31	0	9	16	1	0	15	41	1	14	29	8	0	20	72
San Luis Obispo	0	10	24	0	0	7	41	0	0	3	0	0	1	4	0	10	27	0	0	8	45
Santa Barbara	0	0	7	1	0	10	18	0	4	9	1	0	7	21	0	4	16	2	0	17	39
Ventura	0	1	10	0	0	1	12	0	1	2	0	0	1	4	0	2	12	0	0	2	16
Los Angeles	0	3	16	7	1	16	43	0	18	55	1	0	25	99	0	21	71	8	1	41	142
Orange	0	4	13	5	4	8	34	0	6	9	0	1	6	22	0	10	22	5	5	14	56
San Diego	0	14	45	12	2	27	100	0	14	42	10	1	41	108	0	28	87	22	3	68	208
Total	1	44	140	36	7	87	315	0	70	157	14	2	115	358	1	114	297	50	9	202	673

C3. AAA Rating Percentages

C3.1. AAA-rated and Non-AAA-rated Hotel Percentages

Table C5. Inventory Coastal Zone AAA-rated and Non-AAA-rated Hotel Percentages

Area (Coastal Zone)	Total			%		
	AAA	Non-AAA	Total	AAA	Non-AAA	Total
California Coastal Counties	228	87	315	72%	28%	100%
City of Long Beach	5	1	6	83%	17%	100%
Los Angeles County	27	16	43	63%	37%	100%
Orange County	26	8	34	76%	24%	100%
Los Angeles County and Orange County	53	24	77	69%	31%	100%

Table C6. Inventory Five-Mile Zone AAA-rated and Non-AAA-rated Hotel Percentages

Area (Five-Mile Zone)	Total			%		
	AAA	Non-AAA	Total	AAA	Non-AAA	Total
California Coastal Counties	471	202	673	70%	30%	100%
City of Long Beach	17	10	27	63%	37%	100%
Los Angeles County	101	41	142	71%	29%	100%
Orange County	42	14	56	75%	25%	100%
Los Angeles County and Orange County	143	55	198	72%	28%	100%

Table C7. Coastal Counties Coastal Zone AAA-rated and non-AAA-rated Hotel Percentages

Area (Coastal Zone) (Counties from North to South)	Total			%		
	AAA	Non-AAA	Total	AAA	Non-AAA	Total
Del Norte	2	1	3	67%	33%	100%
Humboldt	4	3	7	57%	43%	100%
Mendocino	2	1	3	67%	33%	100%
Sonoma	1	3	4	25%	75%	100%
Marin	0	0	0	-	-	-
San Francisco	0	1	1	0%	100%	100%
San Mateo	7	0	7	100%	0%	100%
Santa Cruz	7	4	11	64%	36%	100%
Monterey	26	5	31	84%	16%	100%
San Luis Obispo	34	7	41	83%	17%	100%
Santa Barbara	8	10	18	44%	56%	100%
Ventura	11	1	12	92%	8%	100%
Los Angeles	27	16	43	63%	37%	100%
Orange	26	8	34	76%	24%	100%
San Diego	73	27	100	73%	27%	100%
Total	228	87	315	72%	28%	100%

Table C8. Five-Mile Zone AAA-rated and Non-AAA-rated Hotel Percentages

Area (Five-Mile Zone) (Counties from North to South)	Total			Total		
	AAA	Non-AAA	Total	AAA	Non-AAA	Total
Del Norte	3	3	6	50%	50%	100%
Humboldt	13	8	21	62%	38%	100%
Mendocino	3	2	5	60%	40%	100%
Sonoma	1	3	4	25%	75%	100%
Marin	5	4	9	56%	44%	100%
San Francisco	10	5	15	67%	33%	100%
San Mateo	8	1	9	89%	11%	100%
Santa Cruz	20	6	26	77%	23%	100%
Monterey	52	20	72	72%	28%	100%
San Luis Obispo	37	8	45	82%	18%	100%
Santa Barbara	22	17	39	56%	44%	100%
Ventura	14	2	16	88%	13%	100%
Los Angeles	101	41	142	71%	29%	100%
Orange	42	14	56	75%	25%	100%
San Diego	140	68	208	67%	33%	100%
Total	471	202	673	70%	30%	100%

C3.2. AAA Diamond Rating Percentages

Table C9. Inventory Coastal Zone AAA Diamond Rating Percentages

Area (Coastal Zone)	Total							%						
	1	2	3	4	5	NR	Total	1	2	3	4	5	NR	Total
California Coastal Counties	1	44	140	36	7	87	315	0%	14%	44%	11%	2%	28%	100%
City of Long Beach	0	1	3	1	0	1	6	0%	17%	50%	17%	0%	17%	100%
Los Angeles County	0	3	16	7	1	16	43	0%	7%	37%	16%	2%	37%	100%
Orange County	0	4	13	5	4	8	34	0%	12%	38%	15%	12%	24%	100%
Los Angeles County and Orange County	0	7	29	12	5	24	77	0%	9%	38%	16%	6%	31%	100%

Table C10. Inventory Five-Mile Zone AAA Diamond Rating Percentages

Area (Five-Mile Zone)	Total							%						
	1	2	3	4	5	NR	Total	1	2	3	4	5	NR	Total
California Coastal Counties	1	114	297	50	9	202	673	0%	17%	44%	7%	1%	30%	100%
City of Long Beach	0	5	10	1	0	10	26	0%	19%	38%	4%	0%	38%	100%
Los Angeles County	0	21	71	8	1	41	142	0%	15%	50%	6%	1%	29%	100%
Orange County	0	10	22	5	5	14	56	0%	18%	39%	9%	9%	25%	100%
Los Angeles County and Orange County	0	31	93	13	6	55	198	0%	16%	47%	7%	3%	28%	100%

Table C11. California Coastal Counties Coastal Zone AAA Diamond Rating Percentages

Area (Coastal Zone) (Counties from North to South)	Total							%						
	1	2	3	4	5	NR	Total	1	2	3	4	5	NR	Total
Del Norte	0	0	2	0	0	1	3	0%	0%	67%	0%	0%	33%	100%
Humboldt	0	2	2	0	0	3	7	0%	29%	29%	0%	0%	43%	100%
Mendocino	0	1	1	0	0	1	3	0%	33%	33%	0%	0%	33%	100%
Sonoma	0	0	0	1	0	3	4	0%	0%	0%	25%	0%	75%	100%
Marin	0	0	0	0	0	0	0	-	-	-	-	-	-	-
San Francisco	0	0	0	0	0	1	1	0%	0%	0%	0%	0%	100%	100%
San Mateo	0	0	5	2	0	0	7	0%	0%	71%	29%	0%	0%	100%
Santa Cruz	0	4	2	1	0	4	11	0%	36%	18%	9%	0%	36%	100%
Monterey	1	5	13	7	0	5	31	3%	16%	42%	23%	0%	16%	100%
San Luis Obispo	0	10	24	0	0	7	41	0%	24%	59%	0%	0%	17%	100%
Santa Barbara	0	0	7	1	0	10	18	0%	0%	39%	6%	0%	56%	100%
Ventura	0	1	10	0	0	1	12	0%	8%	83%	0%	0%	8%	100%
Los Angeles	0	3	16	7	1	16	43	0%	7%	37%	16%	2%	37%	100%
Orange	0	4	13	5	4	8	34	0%	12%	38%	15%	12%	24%	100%
San Diego	0	14	45	12	2	27	100	0%	14%	45%	12%	2%	27%	100%
Total	1	44	140	36	7	87	315	0%	14%	44%	11%	2%	28%	100%

Table C12. California Coastal Counties Five-Mile Zone AAA Diamond Rating Percentages

Area (Five-Mile Zone) (Counties from North to South)	Total							%						
	1	2	3	4	5	NR	Total	1	2	3	4	5	NR	Total
Del Norte	0	1	2	0	0	3	6	0%	17%	33%	0%	0%	50%	100%
Humboldt	0	7	6	0	0	8	21	0%	33%	29%	0%	0%	38%	100%
Mendocino	0	2	1	0	0	2	5	0%	40%	20%	0%	0%	40%	100%
Sonoma	0	0	0	1	0	3	4	0%	0%	0%	25%	0%	75%	100%
Marin	0	0	5	0	0	4	9	0%	0%	56%	0%	0%	44%	100%
San Francisco	0	6	4	0	0	5	15	0%	40%	27%	0%	0%	33%	100%
San Mateo	0	0	6	2	0	1	9	0%	0%	67%	22%	0%	11%	100%
Santa Cruz	0	9	9	2	0	6	26	0%	35%	35%	8%	0%	23%	100%
Monterey	1	14	29	8	0	20	72	1%	19%	40%	11%	0%	28%	100%
San Luis Obispo	0	10	27	0	0	8	45	0%	22%	60%	0%	0%	18%	100%
Santa Barbara	0	4	16	2	0	17	39	0%	10%	41%	5%	0%	44%	100%
Ventura	0	2	12	0	0	2	16	0%	13%	75%	0%	0%	13%	100%
Los Angeles	0	21	71	8	1	41	142	0%	15%	50%	6%	1%	29%	100%
Orange	0	10	22	5	5	14	56	0%	18%	39%	9%	9%	25%	100%
San Diego	0	28	87	22	3	68	208	0%	13%	42%	11%	1%	33%	100%
Total	1	114	297	50	9	202	673	0%	17%	44%	7%	1%	30%	100%

Appendix D. STR Trend Reports: Results and Data

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D1. Introduction

Appendix D presents the results and additional data from the STR trend reports discussed in Chapter 5. This appendix presents three sets of data:

- Hotel counts, ADR data, and multipliers from 2009 to 2015 for the inventories studied in Chapter 5,
- Changes in July and August ADR data from 2009 to 2015 and 2013 to 2015, and
- Ancillary data including the hotels added from the September 24, 2015 STR participation list and the data for the City of Long Beach – Outside Coastal Zone, Inside Five-Mile Zone inventory.

D2. 2009 to 2015 Hotel Counts, ADR Data, and Multipliers

Tables D1 through D11 show the hotel counts, ADR Data (July and August as well as annual), and multipliers from 2009 through 2015 for the inventories studied in the technical report. This data was derived from STR trend reports. As explained in Chapter 5, all inventories except for California Statewide are limited to AAA-rated hotels, which likely deflates the California Statewide ADR relative to the other inventories.

D2.1. California Statewide

Table D1. California Statewide Hotel Counts, ADR Data, and Multipliers

Year	Hotel Count (Year High)	July and August ADR				Annual ADR		Multiplier (July and August / Annual)
		July	August	Average	% Change	Annual	% Change	
2009	5,521	\$113.95	\$113.13	\$113.54		\$110.22		1.0301
2010	5,525	\$116.39	\$117.03	\$116.71	2.79%	\$110.31	0.08%	1.0580
2011	5,507	\$125.25	\$123.21	\$124.23	6.44%	\$116.61	5.71%	1.0653
2012	5,494	\$132.62	\$131.79	\$132.21	6.42%	\$123.64	6.03%	1.0693
2013	5,499	\$140.03	\$142.52	\$141.27	6.86%	\$130.67	5.69%	1.0812
2014	5,514	\$150.90	\$155.27	\$153.08	8.36%	\$140.18	7.28%	1.0920
2015	5,543	\$164.20	\$163.78	\$163.99	7.12%	\$151.21	7.86%	1.0845
Average		\$134.76	\$135.25	\$135.00	6.33%	\$121.94	4.96%	1.0660
2015 annual ADR represents January through September, and is not included in annual ADR or multiplier averages.								

D2.2. California Coastal Premium Inventories

Table D2. California Coastal Counties – Coastal Zone Hotel Counts, ADR Data, and Multiplier

Year	Hotel Count (Year High)	July and August ADR				Annual ADR		Multiplier (July and August / Annual)
		July	August	Average	% Change	Annual	% Change	
2009	223	\$193.87	\$192.01	\$192.94		\$173.75		1.1105
2010	223	\$200.66	\$198.98	\$199.82	3.57%	\$174.14	0.22%	1.1475
2011	225	\$215.74	\$205.70	\$210.72	5.45%	\$181.69	4.34%	1.1598
2012	226	\$227.77	\$221.22	\$224.50	6.54%	\$191.63	5.47%	1.1715
2013	226	\$238.00	\$233.03	\$235.51	4.91%	\$198.21	3.43%	1.1882
2014	229	\$253.22	\$254.55	\$253.88	7.80%	\$209.48	5.69%	1.2120
2015	228	\$271.22	\$258.85	\$265.04	4.39%	\$226.33	8.04%	1.1710
Average		\$228.64	\$223.48	\$226.06	5.44%	\$188.15	3.83%	1.1649
2015 annual ADR represents January through September, and is not included in annual ADR or multiplier averages.								

Table D3. California Coastal Counties – Five-Mile Zone Hotel Counts, ADR Data, and Multipliers

Year	Hotel Count (Year High)	July and August ADR				Annual ADR		Multiplier (July and August / Annual)
		July	August	Average	% Change	Annual	% Change	
2009	456	\$158.97	\$157.20	\$158.09		\$145.23		1.0885
2010	457	\$163.60	\$161.99	\$162.79	2.98%	\$144.80	-0.30%	1.1243
2011	459	\$175.49	\$167.20	\$171.35	5.26%	\$151.00	4.28%	1.1348
2012	463	\$185.22	\$179.39	\$182.31	6.40%	\$158.79	5.16%	1.1481
2013	464	\$194.28	\$189.18	\$191.73	5.17%	\$164.21	3.41%	1.1676
2014	470	\$206.72	\$206.57	\$206.64	7.78%	\$174.12	6.03%	1.1868
2015	471	\$223.76	\$213.70	\$218.73	5.85%	\$189.43	8.80%	1.1547
Average		\$186.86	\$182.18	\$184.52	5.57%	\$156.36	3.72%	1.1417
2015 annual ADR represents January through September, and is not included in annual ADR or multiplier averages.								

D2.3. Local Cost Inventories

D2.3.1. City of Long Beach

Table D4. City of Long Beach – Coastal Zone Hotel Counts, ADR Data, and Multipliers

Year	Hotel Count (Year High)	July and August ADR				Annual ADR		Multiplier (July and August / Annual)
		July	August	Average	% Change	Annual	% Change	
2009	5	\$127.52	\$125.76	\$126.64		\$132.59		0.9552
2010	5	\$131.53	\$133.93	\$132.73	4.81%	\$140.86	6.24%	0.9423
2011	5	\$147.18	\$135.08	\$141.13	6.32%	\$145.38	3.21%	0.9707
2012	5	\$152.26	\$146.53	\$149.40	5.86%	\$150.60	3.59%	0.9920
2013	5	\$152.31	\$150.41	\$151.36	1.31%	\$157.79	4.77%	0.9593
2014	5	\$170.89	\$166.38	\$168.64	11.41%	\$165.24	4.72%	1.0206
2015	5	\$202.74	\$180.34	\$191.54	13.58%	\$183.13	10.83%	1.0459
Average		\$154.92	\$148.35	\$151.63	7.22%	\$148.74	4.51%	0.9733
2015 annual ADR represents January through September, and is not included in annual ADR or multiplier averages.								

Table D5. City of Long Beach – Five-Mile Zone Hotel Counts, ADR Data, and Multipliers

Year	Hotel Count (Year High)	July and August ADR				Annual ADR		Multiplier (July and August / Annual)
		July	August	Average	% Change	Annual	% Change	
2009	17	\$110.79	\$113.48	\$112.13		\$117.39		0.9552
2010	17	\$110.18	\$112.96	\$111.57	-0.50%	\$118.22	0.71%	0.9437
2011	17	\$118.68	\$113.26	\$115.97	3.94%	\$119.95	1.46%	0.9668
2012	17	\$123.09	\$121.10	\$122.10	5.28%	\$122.88	2.45%	0.9936
2013	17	\$126.42	\$123.37	\$124.89	2.29%	\$127.68	3.90%	0.9782
2014	17	\$137.90	\$135.45	\$136.68	9.44%	\$133.31	4.41%	1.0253
2015	17	\$161.01	\$149.09	\$155.05	13.44%	\$148.30	11.25%	1.0455
Average		\$126.87	\$124.10	\$125.48	5.65%	\$123.24	2.59%	0.9771
2015 annual ADR represents January through September, and is not included in annual ADR or multiplier averages.								

D2.3.2. Los Angeles County

Table D6. Los Angeles County – Coastal Zone Hotel Counts, ADR Data, and Multipliers

Year	Hotel Count (Year High)	July and August ADR				Annual ADR		Multiplier (July and August / Annual)
		July	August	Average	% Change	Annual	% Change	
2009	26	\$190.10	\$193.76	\$191.93		\$182.21		1.0533
2010	26	\$205.92	\$209.58	\$207.75	8.24%	\$189.66	4.09%	1.0954
2011	27	\$234.87	\$231.46	\$233.17	12.23%	\$205.25	8.22%	1.1360
2012	27	\$249.23	\$246.47	\$247.85	6.30%	\$220.19	7.28%	1.1256
2013	27	\$260.57	\$269.69	\$265.13	6.97%	\$233.05	5.84%	1.1376
2014	27	\$286.17	\$298.93	\$292.55	10.34%	\$252.17	8.20%	1.1601
2015	27	\$313.47	\$315.10	\$314.29	7.43%	\$270.90	7.43%	1.1601
Average		\$248.62	\$252.14	\$250.38	8.59%	\$213.76	6.73%	1.1180
2015 annual ADR represents January through September, and is not included in annual ADR or multiplier averages.								

Table D7. Los Angeles County – Five-Mile Zone Hotel Counts, ADR Data, and Multipliers

Year	Hotel Count (Year High)	July and August ADR				Annual ADR		Multiplier (July and August / Annual)
		July	August	Average	% Change	Annual	% Change	
2009	96	\$124.30	\$126.91	\$125.61		\$122.78		1.0230
2010	96	\$128.73	\$131.97	\$130.35	3.78%	\$124.06	1.04%	1.0507
2011	97	\$143.86	\$140.88	\$142.37	9.22%	\$131.72	6.18%	1.0808
2012	97	\$152.49	\$151.23	\$151.86	6.67%	\$140.13	6.38%	1.0837
2013	98	\$158.17	\$161.38	\$159.77	5.21%	\$146.51	4.55%	1.0905
2014	101	\$174.02	\$179.03	\$176.53	10.48%	\$158.45	8.15%	1.1141
2015	101	\$198.27	\$196.56	\$197.42	11.83%	\$173.71	9.63%	1.1365
Average		\$154.26	\$155.42	\$154.84	7.87%	\$137.28	5.26%	1.0738
2015 annual ADR represents January through September, and is not included in annual ADR or multiplier averages.								

D2.3.3. Orange County

Table D8. Orange County – Coastal Zone Hotel Counts, ADR Data, and Multipliers

Year	Hotel Count (Year High)	July and August ADR				Annual ADR		Multiplier (July and August / Annual)
		July	August	Average	% Change	Annual	% Change	
2009	26	\$273.32	\$278.03	\$275.68		\$230.11		1.1980
2010	26	\$287.15	\$283.70	\$285.43	3.54%	\$228.01	-0.91%	1.2518
2011	26	\$312.59	\$303.28	\$307.93	7.89%	\$242.22	6.24%	1.2713
2012	26	\$335.61	\$327.21	\$331.41	7.62%	\$259.42	7.10%	1.2775
2013	26	\$349.11	\$356.66	\$352.89	6.48%	\$274.81	5.93%	1.2841
2014	26	\$369.62	\$401.80	\$385.71	9.30%	\$288.32	4.92%	1.3378
2015	26	\$397.51	\$400.82	\$399.16	3.49%	\$313.19	8.63%	1.2745
Average		\$332.13	\$335.93	\$334.03	6.39%	\$253.81	4.65%	1.2701
2015 annual ADR represents January through September, and is not included in annual ADR or multiplier averages.								

Table D9. Orange County – Five Mile Zone Hotel Counts, ADR Data, and Multipliers

Year	Hotel Count (Year High)	July and August ADR				Annual ADR		Multiplier (July and August / Annual)
		July	August	Average	% Change	Annual	% Change	
2009	41	\$238.90	\$244.10	\$241.50		\$203.40		1.1873
2010	41	\$249.33	\$247.69	\$248.51	2.90%	\$200.75	-1.30%	1.2379
2011	41	\$269.78	\$262.93	\$266.35	7.18%	\$212.83	6.01%	1.2515
2012	42	\$285.70	\$279.89	\$282.80	6.17%	\$224.77	5.61%	1.2582
2013	42	\$298.22	\$306.18	\$302.20	6.86%	\$238.57	6.14%	1.2667
2014	42	\$315.51	\$347.28	\$331.39	9.66%	\$250.75	5.10%	1.3216
2015	42	\$339.44	\$344.27	\$341.85	3.16%	\$271.42	8.24%	1.2595
Average		\$285.27	\$290.33	\$287.80	5.99%	\$221.84	4.31%	1.2539
2015 annual ADR represents January through September, and is not included in annual ADR or multiplier averages.								

D2.4. Los Angeles County and Orange County

Table D10. Los Angeles County and Orange County – Coastal Zone Hotel Counts, ADR Data, and Multipliers

Year	Hotel Count (Year High)	July and August ADR				Annual ADR		Multiplier (July and August / Annual)
		July	August	Average	% Change	Annual	% Change	
2009	52	\$230.93	\$235.10	\$233.01		\$205.71		1.1327
2010	52	\$245.77	\$245.94	\$245.86	5.51%	\$208.47	1.34%	1.1793
2011	53	\$272.99	\$266.69	\$269.84	9.76%	\$223.39	7.15%	1.2080
2012	53	\$291.61	\$286.08	\$288.84	7.04%	\$239.44	7.18%	1.2063
2013	53	\$304.01	\$312.35	\$308.18	6.69%	\$253.54	5.89%	1.2155
2014	53	\$327.11	\$349.39	\$338.25	9.76%	\$269.90	6.46%	1.2532
2015	53	\$354.70	\$357.15	\$355.92	5.22%	\$291.65	8.06%	1.2204
Average		\$289.59	\$293.24	\$291.42	7.33%	\$233.41	5.61%	1.1992
2015 annual ADR represents January through September, and is not included in annual ADR or multiplier averages.								

Table D11. Los Angeles County and Orange County – Five-Mile Zone Hotel Counts, ADR Data, and Multipliers

Year	Hotel Count (Year High)	July and August ADR				Annual ADR		Multiplier (July and August / Annual)
		July	August	Average	% Change	Annual	% Change	
2009	137	\$157.96	\$161.33	\$159.64		\$146.46		1.0900
2010	137	\$164.15	\$165.96	\$165.05	3.39%	\$146.58	0.08%	1.1260
2011	138	\$180.84	\$176.72	\$178.78	8.32%	\$155.54	6.11%	1.1494
2012	139	\$191.62	\$189.02	\$190.32	6.45%	\$164.99	6.07%	1.1535
2013	140	\$199.31	\$203.91	\$201.61	5.93%	\$173.55	5.19%	1.1617
2014	143	\$215.58	\$228.44	\$222.01	10.12%	\$185.56	6.92%	1.1964
2015	143	\$239.73	\$239.94	\$239.84	8.03%	\$202.41	9.08%	1.1849
Average		\$192.74	\$195.05	\$193.89	7.04%	\$162.11	4.88%	1.1462
2015 annual ADR represents January through September, and is not included in annual ADR or multiplier averages.								

D3. Change Over Time

While the tables above present percentage changes from year to year, the tables below show percentage changes from 2009 to 2015 and 2013 to 2015 for the July and August ADR.

Table D12. Coastal Zone and Statewide ADR Percentage Changes from 2009 to 2015 and 2013 to 2009

Area (Coastal Zone)	2015	2013		2009	
	July and August ADR	July and August ADR	% Change to 2015	July and August ADR	% Change to 2015
California (Statewide)	\$163.99	\$141.27	16.08%	\$113.54	44.44%
California Coastal Counties	\$265.04	\$235.51	12.54%	\$192.94	37.37%
City of Long Beach	\$191.54	\$151.36	26.55%	\$126.64	51.25%
Los Angeles County	\$314.29	\$265.13	18.54%	\$275.68	14.01%
Orange County	\$399.16	\$352.89	13.11%	\$233.01	71.30%
Los Angeles County and Orange County	\$355.92	\$308.18	15.49%	\$233.01	52.75%

Table D13. Five-Mile Zone and Statewide ADR Percentage Changes from 2009 to 2015 and 2013 to 2009

Area (Five-Mile Zone)	2015	2013		2009	
	July and August ADR	July and August ADR	% Change to 2015	July and August ADR	% Change to 2015
California (Statewide)	\$163.99	\$141.27	16.08%	\$113.54	44.44%
California Coastal Counties	\$218.73	\$191.73	14.08%	\$158.09	38.36%
City of Long Beach	\$155.05	\$124.89	24.15%	\$112.13	38.27%
Los Angeles County	\$197.42	\$159.77	23.56%	\$125.61	57.17%
Orange County	\$341.85	\$302.20	13.12%	\$241.50	41.56%
Los Angeles County and Orange County	\$239.84	\$201.61	18.96%	\$159.64	50.23%

D4. Ancillary Data

Tables D14 and D15 present ancillary data used in the collection and analysis stages discussed in Chapter 5. Table D14 shows the seven hotels added to the master list from the September 24, 2015 STR participation list of new hotels participating in STR surveys since January 1, 2014. Table D15 shows the results from the STR trend report for City of Long Beach – Outside Coastal Zone, Inside Five-Mile Zone. The data in Table D15 was disaggregated from the data for the City of Long Beach – Five-Mile Zone to produce the data for the City of Long Beach – Coastal Zone.

Table D14. STR Participating Hotels Starting January 2014 or Later (7 hotels)

No.	ID	County	Zone	Business Name	Address	City	Zip	LAT Poly	LONG Poly	AAA Rating
Coastal Zone (2 hotels)										
1	002	Del Norte	CZ	Holiday Inn Express Klamath Redwood National Park Area	171 Klamath Blvd.	Klamath	95548	41.529546	-124.039174	3
2	376	San Diego	CZ	Springhill Suites San Diego Oceanside Downtown	110 North Myers St.	Oceanside	92054	33.193953	-117.381674	3
Outside Coastal Zone, Inside Five-Mile Zone (5 hotels)										
1	227	Los Angeles	FZ	Hampton Inn Los Angeles International Airport Hawthorne	11430 Acacia Ave.	Hawthorne	90250	33.930668	-118.350660	3
2	272	Los Angeles	FZ	Residence Inn Los Angeles Redondo Beach	2420 Marine Ave.	Redondo Beach	90278	33.892991	-118.365532	3
3	273	Los Angeles	FZ	Hilton Garden Inn Los Angeles Redondo Beach	2410 Marine Ave.	Redondo Beach	90278	33.893820	-118.366599	3
4	469	San Diego	FZ	Hampton Inn San Diego Mission Valley	2151 Hotel Cir S	San Diego	92108	32.758259	-117.182106	3
5	470	San Diego	FZ	Holiday Inn Express & Suites San Diego Hotel Circle	635 Hotel Cir S	San Diego	92108	32.759889	-117.169466	3

Table D15. City of Long Beach - Outside Coastal Zone, Inside Five-Mile Zone Hotel Counts, ADR Data, and Multipliers

Year	Hotel Count (Year High)	July and August ADR				Annual ADR		Multiplier (July and August / Annual)
		July	August	Average	% Change	Annual	% Change	
2009	12	\$103.82	\$108.36	\$106.09		\$111.06		0.9553
2010	12	\$101.28	\$104.22	\$102.75	-3.15%	\$108.79	-2.04%	0.9445
2011	12	\$106.81	\$104.17	\$105.49	2.66%	\$109.35	0.51%	0.9647
2012	12	\$110.94	\$110.51	\$110.72	4.96%	\$111.34	1.82%	0.9945
2013	12	\$115.63	\$112.10	\$113.87	2.84%	\$115.14	3.41%	0.9889
2014	12	\$124.16	\$122.57	\$123.36	8.34%	\$120.00	4.22%	1.0280
2015	12	\$143.63	\$136.06	\$139.84	13.36%	\$133.79	11.49%	1.0453
Average		\$115.18	\$114.00	\$114.59	4.84%	\$112.61	1.59%	0.9793
2015 annual ADR represents January through September, and is not included in annual ADR or multiplier averages.								

Appendix E. CCC In-Lieu Fee Trigger Formula: Inventories and Application

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E1. Introduction

Appendix E presents the inventories and applications of the CCC in-lieu fee trigger formula as discussed in Chapter 5. Table E1 below shows summary counts of the inventories by AAA rating (limited one or two-diamond hotels, as explained in Chapter 3) and the 2014 multiplier applied to each inventories average 2015 AAA estimated annual ADR to produce the estimated July and August 2015 ADR. As explained in Chapter 5, the 2014 multipliers were used because the complete 12-month 2015 ADR figures needed to generate a 2015 multiplier are not yet available.

Table E1. CCC In-Lieu Fee Trigger Inventory Summary and Multipliers

Political	Distance from the Coast	AAA 1 or 2-Diamond Hotels				2014 Multiplier
		Total	Below CA ADR	Above CA ADR	Rates not Published	
City of Long Beach	Coastal Zone	1	0	1	0	1.0206
City of Long Beach	Five-Mile Zone	5	1	3	1	1.0253
Los Angeles County	Coastal Zone	3	1	1	1	1.1601
Los Angeles County	Five-Mile Zone	21	9	8	4	1.1141
Orange County	Coastal Zone	4	1	3	0	1.3216
Orange County	Five-Mile Zone	10	5	4	1	1.3378
Los Angeles County and Orange County	Coastal Zone	7	2	4	1	1.2532
Los Angeles County and Orange County	Five-Mile Zone	31	14	12	5	1.1964
None of the above inventories include 1-Diamond hotels.						

The tables below show the following:

- **Inventories:** The one or two-diamond AAA-rated hotels, the application of the 2014 multiplier, and the Local Low ADR produced by hotels falling below the July and August 2015 Statewide ADR of \$163.99.
- **Application:** The application of the CCC's in-lieu fee trigger formula to the each inventories Local Low ADR to produce the Local High Cost Point.

E2. CCC In-lieu Fee Trigger Inventories

E2.1. City of Long Beach

Table E2. City of Long Beach – Coastal Zone CCC In-Lieu Fee Trigger Inventory (1 hotel)

No.	ID	County	Zone	Business Name	City	Zip	AAA	AAA 2015 Cost Estimate			Est. July and August 2015 ADR	
								Low	High	Avg.	2014 Multiplier	Est. ADR
Above 2015 July and August Statewide ADR (\$163.99) (1 hotel)												
1	192	Los Angeles	CZ	Best Western Golden Sails Htl	Long Beach	90803	2	\$165.00	\$175.00	\$170.00	1.0206	\$173.50

Table E3. City of Long Beach – Five-Mile Zone CCC In-Lieu Fee Trigger Inventory (5 hotels)

No.	ID	County	Zone	Business Name	City	Zip	AAA	AAA 2015 Cost Estimate			Est. July and August 2015 ADR	
								Low	High	Avg.	2014 Multiplier	Est. ADR
Below 2015 July and August Statewide ADR (\$163.99) (1 hotel)												
1	243	Los Angeles	FZ	Quality Inn Long Beach Airport	Long Beach	90755	2	\$79.00	\$139.00	\$109.00	1.0253	\$111.76
Local Low ADR											\$111.76	
Above 2015 July and August Statewide ADR (\$163.99) (3 hotels)												
1	192	Los Angeles	CZ	Best Western Golden Sails Htl	Long Beach	90803	2	\$165.00	\$175.00	\$170.00	1.0253	\$174.30
2	239	Los Angeles	FZ	Best Western of Long Beach	Long Beach	90813	2	\$129.00	\$229.00	\$179.00	1.0253	\$183.53
3	238	Los Angeles	FZ	Travelodge Long Beach Convention Center	Long Beach	90802	2	\$119.00	\$259.00	\$189.00	1.0253	\$193.78
2015 AAA Rates Not Published (1 hotel)												
1	242	Los Angeles	FZ	Extended Stay America Los Angeles - Long Beach Airport	Long Beach	90815	2	NA	NA	NA	NA	NA

E2.2. Los Angeles County

Table E4. Los Angeles County – Coastal Zone CCC In-Lieu Fee Trigger Inventory (3 hotels)

No.	ID	County	Zone	Business Name	City	Zip	AAA	AAA 2015 Cost Estimate			Est. July and August 2015 ADR	
								Low	High	Avg.	2014 Multiplier	Est. ADR
Below 2015 July and August Statewide ADR (\$163.99) (1 hotel)												
1	203	Los Angeles	CZ	Ramada Limited Redondo Beach	Redondo Beach	90277	2	\$74.00	\$179.00	\$126.50	1.1601	\$146.75
Local Low ADR												\$146.75
Above 2015 July and August Statewide ADR (\$163.99) (1 hotel)												
1	192	Los Angeles	CZ	Best Western Golden Sails Htl	Long Beach	90803	2	\$165.00	\$175.00	\$170.00	1.1601	\$197.22
2015 AAA Rates Not Published (1 hotel)												
1	213	Los Angeles	CZ	Ocean View Hotel	Santa Monica	90401	2	NA	NA	NA	NA	NA

Table E5. Los Angeles County – Five-Mile Zone CCC In-Lieu Fee Trigger Inventory (21 hotels)

No.	ID	County	Zone	Business Name	City	Zip	AAA	AAA 2015 Cost Estimate			Est. July and August 2015 ADR	
								Low	High	Avg.	2014 Multiplier	Est. ADR
Below 2015 July and August Statewide ADR (\$163.99) (9 hotels)												
1	253	Los Angeles	FZ	Super8 - Los Angeles International Airport Hotel	Los Angeles	90045	2	\$74.00	\$100.00	\$87.00	1.1141	\$96.92
2	243	Los Angeles	FZ	Quality Inn Long Beach Airport	Long Beach	90755	2	\$79.00	\$139.00	\$109.00	1.1141	\$121.43
3	233	Los Angeles	FZ	Days Inn LAX Airport South Bay - Lawndale	Lawndale	90260	2	\$70.00	\$170.00	\$120.00	1.1141	\$133.69
4	280	Los Angeles	FZ	Travelodge Torrance/Redondo Beach	Torrance	90501	2	\$75.00	\$175.00	\$125.00	1.1141	\$139.26
5	203	Los Angeles	CZ	Ramada Limited Redondo Beach	Redondo Beach	90277	2	\$74.00	\$179.00	\$126.50	1.1141	\$140.93
6	259	Los Angeles	FZ	Super 8 Los Angeles Culver City	Los Angeles	90066	2	\$105.00	\$159.00	\$132.00	1.1141	\$147.06
7	217	Los Angeles	FZ	Travelodge Los Angeles Culver City	Culver City	90232	2	\$120.00	\$145.00	\$132.50	1.1141	\$147.61
8	285	Los Angeles	FZ	Ramada Inn Torrance - South Bay	Torrance	90505	2	\$74.00	\$199.00	\$136.50	1.1141	\$152.07
9	289	Los Angeles	FZ	BEST WESTERN Los Angeles Worldport Hotel	Wilmington	90803	2	\$100.00	\$174.00	\$137.00	1.1141	\$152.63
Local Low ADR												\$136.84
Above 2015 July and August Statewide ADR (\$163.99) (8 hotels)												
1	277	Los Angeles	FZ	Travelodge Santa Monica Pico Blvd	Santa Monica	90405	2	\$135.00	\$199.00	\$167.00	1.1141	\$186.05
2	271	Los Angeles	FZ	Best Western Redondo Beach Gal	Redondo Beach	90278	2	\$89.00	\$249.00	\$169.00	1.1141	\$188.28
3	192	Los Angeles	CZ	Best Western Golden Sails Htl	Long Beach	90803	2	\$165.00	\$175.00	\$170.00	1.1141	\$189.39
4	275	Los Angeles	FZ	Comfort Inn Near Santa Monica Pier	Santa Monica	90404	2	\$134.00	\$214.00	\$174.00	1.1141	\$193.85
5	239	Los Angeles	FZ	Best Western of Long Beach	Long Beach	90813	2	\$129.00	\$229.00	\$179.00	1.1141	\$199.42
6	238	Los Angeles	FZ	Travelodge Long Beach Convention Center	Long Beach	90802	2	\$119.00	\$259.00	\$189.00	1.1141	\$210.56
7	260	Los Angeles	FZ	Rodeway Inn Culver City	Los Angeles	90066	2	\$95.00	\$300.00	\$197.50	1.1141	\$220.03
8	226	Los Angeles	FZ	Towneplace Suites by Marriott Los Angeles LAX/Manhattan Beach	Hawthorne	90260	2	\$139.00	\$269.00	\$204.00	1.1141	\$227.27

No.	ID	County	Zone	Business Name	City	Zip	AAA	AAA 2015 Cost Estimate			Est. July and August 2015 ADR	
								Low	High	Avg.	2014 Multiplier	Est. ADR
2015 AAA Rates Not Published (4 hotels)												
1	213	Los Angeles	CZ	Ocean View Hotel	Santa Monica	90401	2	NA	NA	NA	NA	NA
2	223	Los Angeles	FZ	Extended Stay America Los Angeles LAX Airport El Segundo	El Segundo	90245	2	NA	NA	NA	NA	NA
3	242	Los Angeles	FZ	Extended Stay America Los Angeles - Long Beach Airport	Long Beach	90815	2	NA	NA	NA	NA	NA
4	256	Los Angeles	FZ	Extended Stay America Los Angeles - LAX Airport	Los Angeles	90045	2	NA	NA	NA	NA	NA

E2.3. Orange County

Table E6. Orange County – Coastal Zone CCC In-Lieu Fee Trigger Inventory (5 hotels)

No.	ID	County	Zone	Business Name	City	Zip	AAA	AAA 2015 Cost Estimate			Est. July and August 2015 ADR	
								Low	High	Avg.	2014 Multiplier	Est. ADR
Below 2015 July and August Statewide ADR (\$163.99) (1 hotel)												
1	312	Orange	CZ	Rodeway Inn San Clemente Beach	San Clemente	92672	2	\$80.00	\$100.00	\$90.00	1.3216	\$118.95
Local Low ADR												\$118.95
Above 2015 July and August Statewide ADR (\$163.99) (3 hotels)												
1	311	Orange	CZ	Best Western Casablanca Inn	San Clemente	92672	2	\$90.00	\$230.00	\$160.00	1.3216	\$211.46
2	306	Orange	CZ	Newport Channel Inn	Newport Beach	92663	2	\$79.00	\$249.00	\$164.00	1.3216	\$216.75
3	296	Orange	CZ	BEST WESTERN Huntington Beach Inn	Huntington Beach	92648	2	\$100.00	\$250.00	\$175.00	1.3216	\$231.29

Table E7. Orange County – Five-Mile Zone CCC In-Lieu Fee Trigger Inventory (10 hotels)

No.	ID	County	Zone	Business Name	City	Zip	AAA	AAA 2015 Cost Estimate			Est. July and August 2015 ADR	
								Low	High	Avg.	2014 Multiplier	Est. ADR
Below 2015 July and August Statewide ADR (\$163.99) (5 hotels)												
1	312	Orange	CZ	Rodeway Inn San Clemente Beach	San Clemente	92672	2	\$80.00	\$100.00	\$90.00	1.3378	\$120.40
2	328	Orange	FZ	San Clemente Beach Travelodge	San Clemente	92672	2	\$60.00	\$120.00	\$90.00	1.3378	\$120.40
3	331	Orange	FZ	Best Western Westminster Inn	Westminster	92683	2	\$85.00	\$120.00	\$102.50	1.3378	\$137.12
4	318	Orange	FZ	Travelodge Costa Mesa Newport Beach	Costa Mesa	92627	2	\$69.00	\$169.00	\$119.00	1.3378	\$159.20
5	323	Orange	FZ	Howard Johnson Huntington Beach	Huntington Beach	92647	2	\$89.00	\$149.00	\$119.00	1.3378	\$159.20
											Local Low ADR	\$139.26
Above 2015 July and August Statewide ADR (\$163.99) (4 hotels)												
1	311	Orange	CZ	Best Western Casablanca Inn	San Clemente	92672	2	\$90.00	\$230.00	\$160.00	1.3378	\$214.05
2	306	Orange	CZ	Newport Channel Inn	Newport Beach	92663	2	\$79.00	\$249.00	\$164.00	1.3378	\$219.40
3	296	Orange	CZ	BEST WESTERN Huntington Beach Inn	Huntington Beach	92648	2	\$100.00	\$250.00	\$175.00	1.3378	\$234.11
4	324	Orange	FZ	Comfort Suites Huntington Beach	Huntington Beach	92647	2	\$79.00	\$299.00	\$189.00	1.3378	\$252.84
2015 AAA Rates Not Published (1 hotel)												
1	316	Orange	FZ	Super 8 Costa Mesa Newport Beach	Costa Mesa	92626	2	NA	NA	NA	NA	NA

E2.4. Los Angeles County and Orange County

Table E8. Los Angeles County and Orange County – Coastal Zone CCC In-Lieu Fee Trigger Inventory (7 hotels)

No.	ID	County	Zone	Business Name	City	Zip	AAA	AAA 2015 Cost Estimate			Est. July and August 2015 ADR	
								Low	High	Avg.	2014 Multiplier	Est. ADR
Below 2015 July and August Statewide ADR (\$163.99) (2 hotels)												
1	312	Orange	CZ	Rodeway Inn San Clemente Beach	San Clemente	92672	2	\$80.00	\$100.00	\$90.00	1.2532	\$112.79
2	203	Los Angeles	CZ	Ramada Limited Redondo Beach	Redondo Beach	90277	2	\$74.00	\$179.00	\$126.50	1.2532	\$158.53
Local Low ADR												\$155.26
Above 2015 July and August Statewide ADR (\$163.99) (4 hotels)												
1	311	Orange	CZ	Best Western Casablanca Inn	San Clemente	92672	2	\$90.00	\$230.00	\$160.00	1.2532	\$200.52
2	306	Orange	CZ	Newport Channel Inn	Newport Beach	92663	2	\$79.00	\$249.00	\$164.00	1.2532	\$205.53
3	192	Los Angeles	CZ	Best Western Golden Sails Htl	Long Beach	90803	2	\$165.00	\$175.00	\$170.00	1.2532	\$213.05
4	296	Orange	CZ	BEST WESTERN Huntington Beach Inn	Huntington Beach	92648	2	\$100.00	\$250.00	\$175.00	1.2532	\$219.31
2015 AAA Rates Not Published (1 hotel)												
1	213	Los Angeles	CZ	Ocean View Hotel	Santa Monica	90401	2	NA	NA	NA	NA	NA

Table E9. Los Angeles County and Orange County – Five-Mile CCC In-Lieu Fee Trigger Inventory (21 hotels)

No.	ID	County	Zone	Business Name	City	Zip	AAA	AAA 2015 Cost Estimate			Est. July and August 2015 ADR	
								Low	High	Avg.	2014 Multiplier	Est. ADR
Below 2015 July and August Statewide ADR (\$163.99) (9 hotels)												
1	253	Los Angeles	FZ	Super8 - Los Angeles International Airport Hotel	Los Angeles	90045	2	\$74.00	\$100.00	\$87.00	1.1141	\$96.92
2	243	Los Angeles	FZ	Quality Inn Long Beach Airport	Long Beach	90755	2	\$79.00	\$139.00	\$109.00	1.1141	\$121.43
3	233	Los Angeles	FZ	Days Inn LAX Airport South Bay - Lawndale	Lawndale	90260	2	\$70.00	\$170.00	\$120.00	1.1141	\$133.69
4	280	Los Angeles	FZ	Travelodge Torrance/Redondo Beach	Torrance	90501	2	\$75.00	\$175.00	\$125.00	1.1141	\$139.26
5	203	Los Angeles	CZ	Ramada Limited Redondo Beach	Redondo Beach	90277	2	\$74.00	\$179.00	\$126.50	1.1141	\$140.93
6	259	Los Angeles	FZ	Super 8 Los Angeles Culver City	Los Angeles	90066	2	\$105.00	\$159.00	\$132.00	1.1141	\$147.06
7	217	Los Angeles	FZ	Travelodge Los Angeles Culver City	Culver City	90232	2	\$120.00	\$145.00	\$132.50	1.1141	\$147.61
8	285	Los Angeles	FZ	Ramada Inn Torrance - South Bay	Torrance	90505	2	\$74.00	\$199.00	\$136.50	1.1141	\$152.07
9	289	Los Angeles	FZ	BEST WESTERN Los Angeles Worldport Hotel	Wilmington	90803	2	\$100.00	\$174.00	\$137.00	1.1141	\$152.63
Local Low ADR												\$136.84
Above 2015 July and August Statewide ADR (\$163.99) (8 hotels)												
1	277	Los Angeles	FZ	Travelodge Santa Monica Pico Blvd	Santa Monica	90405	2	\$135.00	\$199.00	\$167.00	1.1141	\$186.05
2	271	Los Angeles	FZ	Best Western Redondo Beach Gal	Redondo Beach	90278	2	\$89.00	\$249.00	\$169.00	1.1141	\$188.28
3	192	Los Angeles	CZ	Best Western Golden Sails Htl	Long Beach	90803	2	\$165.00	\$175.00	\$170.00	1.1141	\$189.39
4	275	Los Angeles	FZ	Comfort Inn Near Santa Monica Pier	Santa Monica	90404	2	\$134.00	\$214.00	\$174.00	1.1141	\$193.85
5	239	Los Angeles	FZ	Best Western of Long Beach	Long Beach	90813	2	\$129.00	\$229.00	\$179.00	1.1141	\$199.42

No.	ID	County	Zone	Business Name	City	Zip	AAA	AAA 2015 Cost Estimate			Est. July and August 2015 ADR	
								Low	High	Avg.	2014 Multiplier	Est. ADR
6	238	Los Angeles	FZ	Travelodge Long Beach Convention Center	Long Beach	90802	2	\$119.00	\$259.00	\$189.00	1.1141	\$210.56
7	260	Los Angeles	FZ	Rodeway Inn Culver City	Los Angeles	90066	2	\$95.00	\$300.00	\$197.50	1.1141	\$220.03
8	226	Los Angeles	FZ	Towneplace Suites by Marriott Los Angeles LAX/Manhattan Beach	Hawthorne	90260	2	\$139.00	\$269.00	\$204.00	1.1141	\$227.27
2015 AAA Rates Not Published (4 hotels)												
1	213	Los Angeles	CZ	Ocean View Hotel	Santa Monica	90401	2	NA	NA	NA	NA	NA
2	223	Los Angeles	FZ	Extended Stay America Los Angeles LAX Airport El Segundo	El Segundo	90245	2	NA	NA	NA	NA	NA
3	242	Los Angeles	FZ	Extended Stay America Los Angeles - Long Beach Airport	Long Beach	90815	2	NA	NA	NA	NA	NA
4	256	Los Angeles	FZ	Extended Stay America Los Angeles - LAX Airport	Los Angeles	90045	2	NA	NA	NA	NA	NA

E3. Application of CCC In-Lieu Trigger Formula

The formula applied in Table E10 below is examined in detail in Chapter 3.

Table E10. Application of CCC In-Lieu Fee Trigger Formula

Political	Distance from the Coast	July and August 2015 ADR		Local Quotient (Local Low ADR / Statewide ADR)	Cost Range ((1 – Local Quotient) * Statewide ADR)	Local Cost High Point (Statewide ADR + Cost Range)	Local Cost Low Point (Statewide ADR – Cost Range)
		Statewide ADR	Est. Local Low ADR				
City of Long Beach	Coastal Zone	\$163.99	NA	NA	NA	NA	NA
City of Long Beach	Five-Mile Zone		\$111.76	0.68	\$52.24	\$216.23	\$111.76
Los Angeles County	Coastal Zone		\$146.75	0.89	\$17.24	\$181.23	\$146.75
Los Angeles County	Five-Mile Zone		\$136.84	0.83	\$27.15	\$191.14	\$136.84
Orange County	Coastal Zone		\$118.95	0.73	\$45.04	\$209.04	\$118.95
Orange County	Five-Mile Zone		\$139.26	0.85	\$24.73	\$188.72	\$139.26
Los Angeles County and Orange County	Coastal Zone		\$155.26	0.95	\$8.73	\$172.73	\$155.26
Los Angeles County and Orange County	Five-Mile Zone		\$138.96	0.85	\$25.03	\$189.02	\$138.96

Lower Cost Overnight Visitor Serving Accommodations (LCOVA) Mitigation

A Technical Report for the City of Long Beach

October 30, 2015
Administrative Draft

Abstract

Section 30213 of California Coastal Act requires the California Coastal Commission (“CCC”) to protect, encourage, and, where feasible, provide for lower cost overnight visitor accommodations (“LCOVA”) along the State’s coast. As a mitigation measure consistent with this charge, the CCC has, in certain cases, imposed a \$30,000 fee for 25 percent of rooms of new hotel developments that are determined to be high cost (“\$30,000/25% fee”), in-lieu of providing on-site LCOVA facilities. Generally, the CCC has applied this fee in two circumstances: (1) As an ad hoc fee charged to developers upon CCC review of coastal development permit applications, and (2) as a legislatively imposed fee to be adopted by coastal jurisdictions upon CCC certification of a Local Coastal Program or related policy. The City of Long Beach (“City”) requested Lisa Wise Consulting, Inc. to prepare this report to serve as a comprehensive, technical foundation for the City’s subsequent goals, policies, and programs concerning LCOVA mitigation, particularly in relation to the \$30,000/25% fee. Broadly, this report is composed of four parts: Policy analysis, data analysis, legal analysis, and recommendations. Ultimately, this report concludes that the CCC’s \$30,000/25% fee is not an advisable measure for application in Long Beach. (The legal analysis presented in this report does not constitute legal advice and is reserved for review by the city attorney.)

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Chapter 1. Introduction

The City of Long Beach (“City” or “Long Beach”) is an urban coastal community in southwest Los Angeles County located approximately 20 miles south Downtown Los Angeles. The City is roughly 52 square miles, and includes eleven miles of Pacific Ocean shoreline. In 1980, Long Beach’s Local Coastal Program (“LCP”) was first adopted by the City Council and certified by the California Coastal Commission (“CCC”).¹ Like other California coastal jurisdictions, Long Beach faces a number of challenging issues related to land use and economics in the Coastal Zone.

Prepared by Lisa Wise Consulting, Inc. at the request of the City, this report concerns the issue of lower cost overnight visitor serving accommodations (“LCOVA”) mitigation in California Coastal Zone. This chapter explains the issue’s background the report’s purpose and structure.

1.1. Background

Section 30213 of California Coastal Act requires the CCC to protect, encourage, and, where feasible, provide for LCOVA facilities along the State’s coast.² As a mitigation measure per Section 30213, the CCC requires certain hotel and other development projects to include LCOVA facilities or pay an in-lieu fee. From 1977 to 2014, the CCC required over \$25 million for such in-lieu fees across over 30 cases.³

In 2006, the CCC conducted a workshop that studied hotel affordability along the California coast. The study showed that only 7.9 percent of hotels in the State’s nine most popular coastal counties were of low-cost.⁴ Given its charge to provide for LCOVA, the CCC revisited its related mitigation measure and in-lieu fees. Since 2006, the CCC has generally applied a three-prong approach (explained in detail in Chapter 2) that results in the imposition of a \$30,000 fee for 25 percent of hotel rooms determined to be higher cost (“\$30,000/25% fee”). Generally, the CCC has imposed this fee in two circumstances:

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1. City of Long Beach, *Local Coastal Program*, (Long Beach, CA, 1980).
 2. Cal. Pub. Res. Code § 30213. The California Coastal Act is codified in the Cal. Public Res. Code §§ 30000, et seq.
 3. California Coastal Commission, *Public Workshop: Lower Cost Visitor Serving Accommodations Final Agenda (December 10, 2014)*, W3-12-2014, (San Francisco, CA, 2014), 19.
 4. California Coastal Commission, South Coast Area Office, *Major Amendment Request No. LOB-MAJ-1-10 (1-10) to the City of Long Beach Certified Local Coastal Program. For Public Hearing and Commission action at the Commission’s June 16, 2011 Meeting in Marina del Ray*, by John Ainsworth, Gary Timm, and Charles Posner, Th18a-6-2011, (Long Beach, CA, 2011), 33. This staff report concerns the Long Beach LCP Amendment, which is the second case study presented in Chapter 4 of this report.

1. Upon review of coastal development permit (“CDP”) applications, the CCC will require selected development projects to pay the \$30,000/25% fee as a condition of permit approval.
2. Upon review of an LCP or related policy, the CCC will require that cities or other jurisdictions adopt and enforce the \$30,000/25% fee.

Further, the CCC “has required mitigation for use of land that would have been available for lower cost and visitor serving facilities,” meaning the CCC has imposed this fee for proposed hotel developments, whether or not they replace an existing low-cost hotel.⁵

As discussed below, Long Beach enacted LCOVA mitigation, including a legislatively-imposed version of the \$30,000/25% fee, as a condition of CCC-approval of an LCP amendment. Further, as other coastal jurisdictions faced similar requirements by the CCC, the issue of LCOVA mitigation has grown into a major point of contention surrounding coastal development.

1.1.1. LCOVA Mitigation in Long Beach

In 2011, the Long Beach amended its LCP to modify and adopt new land use standards for the Downtown Shoreline Planned Development District (PD-6).⁶ The amendment, enacted by City of Long Beach Ordinance ORD-11-0017, divides Subarea 1 of PD-6 into Subareas 1 and 1a.⁷ The amendment also incorporates the Golden Shore Master Plan into Subarea 1a.⁸ As a condition of approval by the CCC, the amendment adopts LCOVA mitigation measures for Subarea 1a.⁹ These measures include:

- A one-time \$1.5 million fee should a hotel of at least 100 rooms not be built in Subarea 1a during the first two phases of the Golden Shore Master Plan,¹⁰ and
- A LCOVA mitigation measure that requires any proposed non-LCOVA hotel development in Subarea 1a to either pay an in-lieu fee of \$30,000 for 25 percent of rooms or provide LCOVA facilities elsewhere (i.e., a legislatively imposed version of the \$30,000/25% fee).¹¹

5. Ibid., 32.

6. Long Beach, California, Ordinance No. ORD-11-0017.

7. Ibid., 15.

8. Ibid.

9. South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 13.

10. Long Beach, California, Ordinance No. ORD-11-0017, 16-17.

11. Ibid., 17-18.

1.1.2. LCOVA Mitigation as an Issue

The CCC's LCOVA mitigation policy and practices have surfaced as a contentious issue in coastal zone planning and development. At a July 10, 2014, CCC hearing, the imposition of a LCOVA mitigation measure drew critique from both the project applicant and CCC Commissioners. At issue was the Port of San Diego's Port Master Plan amendment accommodating construction of three hotels totaling 500 rooms along Harbor Island.¹² In the project's staff report, the CCC staff recommended the following mitigation requirement:

A minimum of one-third (166 units) of the new 500 hotel rooms on East Harbor Island will be lower-cost overnight accommodations. As a special condition of the coastal development permit for any hotel development, redevelopment or change in lease that adds hotel rooms to East Harbor Island, the hotel developer will develop or designate its fair-share of on-site or off-site lower-cost overnight accommodations or pay an in-lieu fee based on a study conducted by the District that will designate the location and timeframe for construction of lower-cost accommodations within or adjacent to the District. An alternate location for the lower cost overnight accommodations required in this subarea may be considered through a future OMOA, pursuant to the results of the study.¹³

Facing the above requirement, the Port withdrew its application to amend its Port Master Plan. The event was reported as follows:

As the coastal commissioners prepared to vote on the matter following a lengthy public hearing, a port official told the commissioners it was withdrawing its application. The unexpected request came as several commissioners expressed reservations about moving ahead on a project when there is no firm agreement on an affordable lodging policy. "This has been a primary concern of mine as well," said Commissioner Martha McClure. "This is our third hotel development in the last year. For the commission to be 40 years old and not have a defined policy on this, we've come up short. We need a policy on this before we put it on the shoulder of developers."¹⁴

Despite the commissioner's sentiments, it is not entirely the case that the CCC lacks a "defined policy" as to LCOVA mitigation. At the second of two public workshops conducted on this issue,¹⁵ CCC Executive Director Charles Lester explained that the CCC's "policy" on this

12. Lori Weinberg, "Harbor Island Hotel Faces Delay," *San Diego Union-Tribune*, July 9, 2014, accessed July 25, 2014, <http://www.utsandiego.com/news/2014/Jul/09/harbor-island-hotel-delayed-coastal-commission/>

13. California Coastal Commission, San Diego Area Office, *Staff Recommendation on San Diego Unified Port District Port Master Plan Amendment No. 46 (PMP-6-PSD-14-0002-6) East Harbor Island. For Commission consideration and possible action at the Meeting of July 9-11, 2014*, by Sherilyn Sarb, Deborah Lee, Amanda Sackett, W18b-7-2014, (San Diego, CA, 2014), 22.

14. Weinberg, "Harbor Island Hotel Faces Delay."

15. California Coastal Commission, *Public Workshop: Lower Cost Visitor Serving Accommodations* (December 10, 2014); California Coastal Commission, *Public Workshop: Lower Cost Visitor Serving Accommodations Final Agenda* (March 13, 2014), F9-3-2015, (San Francisco, CA, 2015).

issue is defined by statute in Section 30213.¹⁶ Considering Lester's statement, perhaps commissioner's sentiments would be better attributed to the CCC's efforts to enforce the LCOVA mitigation policy. But according to the reporting above, the Port withdrew its application not because it viewed the would-be LCOVA mitigation requirement was vague; the requirement was clear, but unacceptable to the Port.

Further, the CCC's imposition of LCOVA in-lieu fees (i.e., the \$30,000/25% fee) have been questioned as potentially inconsistent with standards governing such conditions. On October 9, 2015, the Port of San Diego filed suit against the CCC for failing approve the Port Master Plan Amendment over the LCOVA mitigation issue.¹⁷

1.2. Purpose and Structure

The purpose of this report is to serve as a comprehensive, technical foundation for Long Beach's subsequent goals, policies, and programs concerning LCOVA mitigation, particularly in relation to the \$30,000/25% fee. Broadly, this report is composed of four parts: Policy analysis, data analysis, legal analysis, and recommendations. (The legal analysis presented in this report does not constitute legal advice and is reserved for review by the city attorney.)

1. **Policy Analysis:** Chapters 2, 3, and 4 explore the CCC's determination and application of its LCOVA mitigation policy and \$30,000/25% fee. Chapter 2 provides a brief background on the CCC's establishment and organization as well as the development of the LCOVA mitigation policy. Chapter 3 dissects the CCC's approach to determining the \$30,000/25% fee and examines its constituent components. Chapter 4 identifies variation and flexibility of this approach across four case studies.
2. **Data Analysis:** Chapter 5 presents data for average rates for coastal hotels in the City of Long Beach, Los Angeles County, Orange County, and all California Coastal Counties in-aggregate. Metrics generated from this data offer a quantitative context for examining application of LCOVA mitigation in Long Beach.
3. **Legal Analysis:** Chapters 6 and 7 consider the legality of the \$30,000/25% fee. Chapter 6 discusses the Federal and California legal standards for review of in-lieu fees. Chapter 7 applies these standards to the \$30,000/25% fee when required upon case-by case permit review or when imposed legislatively by

16. California Coastal Commission, *Friday, March 13, 2015 9:00 A.M.: Public Workshop: Lower Cost Visitor Serving Accommodations* (Video), Accessed April 15, 2015, Retrieved from <http://www.cal-span.org/cgi-bin/archive.php?owner=CCC&date=2015-03-13&player=jwplayer&captions=>

17. Roger Showley, "Port Sues Coastal Commission Over Hotel," *San Diego Union-Tribune*, October 9, 2015, accessed October 9, 2015, <http://www.sandiegouniontribune.com/news/2015/oct/09/port-coastal-sunroad-hotel/>

jurisdictions, generally and in Long Beach, specifically. (The legal analysis presented in this report does not constitute legal advice and is reserved for review by the city attorney.)

4. **Recommendations:** Chapter 8 recommends actions the City may take when facing a CCC-required fee, after adoption of a CCC-required fee, and when offering input on this issue to the CCC.

Ultimately, this report concludes that the CCC's \$30,000/25% fee likely fails the applicable legal standards and is not an advisable measure for application in Long Beach.

Chapter 2. The CCC and LCOVA Mitigation Policy

The CCC was first established in 1972 after California voters passed Proposition 20, and was made permanent by the state legislature in 1976 by adoption of the Coastal Act.¹⁸ The CCC regulates land use and development within the California Coastal Zone.¹⁹ The Coastal Zone stretches across the state's coast and generally extends inland 1,000 yards.²⁰ 15 counties are included in the Coastal Zone (from north to south):

- Del Norte,
- Humboldt,
- Mendocino,
- Sonoma, Marin,
- San Francisco,
- San Mateo,
- Santa Cruz,
- Monterey,
- San Luis Obispo,
- Santa Barbara,
- Ventura,
- Los Angeles,
- Orange, and
- San Diego.

The CCC itself is comprised of 12 voting members and three non-voting members.²¹ The 12 voting members are appointed by the Governor, Senate Rules Committee, or the Speaker of the Assembly and include six local elected officials (e.g., city council members, county

18. California Coastal Commission, "What We Do: Program Overview," last modified 2015, <http://www.coastal.ca.gov/whoweare.html>

19. Cal. Pub. Res. Code § 30103(a). "'Coastal zone' means that land and water area of the State of California from the Oregon border to the border of the Republic of Mexico, specified on the maps identified and set forth in Section 17 of that chapter of the Statutes of the 1975-76 Regular Session enacting this division, extending seaward to the state's outer limit of jurisdiction, including all offshore islands, and extending inland generally 1,000 yards from the mean high tide line of the sea. In significant coastal estuarine, habitat, and recreational areas it extends inland to the first major ridgeline paralleling the sea or five miles from the mean high tide line of the sea, whichever is less, and in developed urban areas the zone generally extends inland less than 1,000 yards. The coastal zone does not include the area of jurisdiction of the San Francisco Bay Conservation and Development Commission, established pursuant to Title 7.2 (commencing with Section 66600) of the Government Code, nor any area contiguous thereto, including any river, stream, tributary, creek, or flood control or drainage channel flowing into such area" (ibid.).

20. Ibid.

21. California Coastal Commission, "Commissioners & Alternates," last modified 2015, <http://www.coastal.ca.gov/roster.html>

supervisors, etc.) and six members of the public.²² The three non-voting members include Secretaries of the Resources Agency, the Business and Transportation Agency, and the Chair of the State Lands Commission.²³ The commission members are supported by an extensive staff lead by the Executive Director.²⁴

In exercising its functions, particularly review and issuance of CDPs and LCPs, the CCC effectuates its LCOVA mitigation policy. These functions and policy are described below.

2.1. Functions of the CCC

For purposes of this report, the two most relevant functions of the CCC are to review and issue CDPs and to approve new and amended LCPs.

2.1.1. Coastal Development Permits

For development projects falling in the CCC's original jurisdiction (i.e., not covered by an LCP (discussed below)), the developer must apply to the CCC for a CDP. According to the CCC, "[p]ermit application review requires CCC staff to analyze the complete permit application and prepare a staff report including recommendations for Commission action. In addition, the CCC receives notice of all pending local coastal development permits."²⁵

2.1.2. Local Coastal Programs

As explained by the CCC, "Local Coastal Programs (LCPs) are basic planning tools used by local governments to guide development in the coastal zone, in partnership with the Coastal Commission."²⁶ Once certified by the CCC, an LCP authorizes its municipality to issue coastal permits in a manner consistent with the Coastal Act and the LCP.²⁷ However, CCC may retake CDP issuance authority, and commonly does, under Sections 30603 (grounds and process by which a local government action may be appealed to the CCC)²⁸ and 30624 (grounds and process by which the CCC executive director may issue permits in emergency and non-

22. Ibid.

23. Ibid.

24. California Coastal Commission, "Commissioner Biographies," last modified 2015, <http://www.coastal.ca.gov/bios.html>

25. California Coastal Commission, "Procedural Guidance for the Review of Wetland Projects in California's Coastal Zone: Chapter 1 - Coastal Development Review Process," last modified June 15, 1994, <http://www.coastal.ca.gov/wetrev/wetttitle.html>

26. California Coastal Commission, "Local Coastal Programs (LCPs)," last modified 2015, <http://www.coastal.ca.gov/lcps.html>

27. California Coastal Commission, *Local Coastal Program (LCP) Update Guide*, (San Francisco, CA, 2013), 2.

28. Cal. Pub. Res. Code § 30603.

emergency cases).²⁹ Sections 30500, et seq. outline the substantive and procedural requirements for LCPs.³⁰ The two major components of an LCP are a land use plan and an implementation plan.³¹ As discussed below, the LCPs must meet comply with the CCC's policy towards LCOVA set forth by Section 30213.³²

2.2. LCOVA Mitigation Policy

The first sentence of the CCC's vision statement addresses the LCOVA issue:

The California coast is available for all to enjoy through thousands of public accessways to and along the shoreline, a completed California Coastal Trail, a well-supported network of parks and open spaces, and *a wide range of visitor-serving facilities, including lower-cost campgrounds, hostels, and hotels* [Emphasis added].³³

The CCC's power to regulate LCOVA is established in in the Coastal Act, but the Act also includes express statutory limitations to this power.³⁴ The CCC exercises its regulatory authority in this realm by imposing the \$30,000/25% fee among other tools.³⁵ Below is a brief discussion of the statutes supporting and limiting the CCC's authority to regulate for LCOVA and the CCC's LCOVA mitigation toolbox.

2.2.1. Supporting Statutes

The CCC finds its authority to impose LCOVA regulations in two sections of the Coastal Act – 30213 and 30222.³⁶ Each statute is explained below.

29. Ibid. § 30624

30. Ibid. §§ 30500, et seq.

31. California Coastal Commission, "Local Coastal Programs (LCPs)."

32. California Coastal Commission, *Local Coastal Program (LCP) Update Guide*, 2.

33. California Coastal Commission, *California Coastal Commission Strategic Plan 2013-2018*, (San Francisco, CA, 2013), 7.

34. The constitutional principle underlying the CCC's regulatory authority – the police power – is discussed in Chapter 5 of this report.

35. The \$30,000/25% fee is not expressly prescribed in the Coastal Act (Cal. Public Resources Code, §§ 3000, et seq.) or in the Coastal Commission Regulations (Title 14 CCR, §§ 13001, et seq.). The \$30,000/25% fee and other LCOVA mitigation are practices by the CCC in an effort to effectuate the LCOVA mitigation policy set forth in Cal. Pub. Res. Code § 30213, discussed in this chapter.

36. Discussed in Chapter 6 of this report, §§ 30213 and 30222 form the foundation of the legitimate state interest supporting the LCOVA in-lieu fee.

2.2.1.1. Section 30213

Section 30213 is the CCC's policy statement concerning LCOVA mitigation. Section 30213 includes two paragraphs. The first paragraph, passed in 1976, grants the CCC authority to take action on the LCOVA issue:

Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.³⁷

The second paragraph, passed in 1981 as an amendment to the statute, limits that authority:

The commission shall not: (1) require that overnight room rentals be fixed at an amount certain for any privately owned and operated hotel, motel, or other similar visitor-serving facility located on either public or private lands; or (2) establish or approve any method for the identification of low or moderate income persons for the purpose of determining eligibility for overnight room rentals in any such facilities.³⁸

Initially, the CCC's actions under Section 30213 focused primarily on affordable housing development in the coastal zone.³⁹ The CCC also acted to regulate rates of new hotel and motel developments, "usually stipulate[ing] that some of the units be rented at reduced rates to people of moderate income."⁴⁰ The 1981 amendment⁴¹ responded to concerns that the CCC overreached in regulation of hotel development, and expressly prohibited the CCC from fixing room rates⁴² and permitting income identification as a rate determinant.

2.2.1.2. Section 30222

Section 30222 further solidifies the CCC's authority to address the LCOVA issue by prioritizing visitor-serving uses over non-visitor serving uses along in the coastal zone:

37. Cal. Pub. Res. Code § 30213.

38. Ibid.

39. Paul A. Sabatier and Daniel A. Mazmanian, *Can Regulation Work?: The Implementation of the 1972 California Coastal Initiative* (New York, NY: Plenum Press, 1983), 332.

40. Ibid., 333. "In a celebrated case involving two 300-unit hotels at Marine del Rey (Los Angeles), the commission accepted the owner's offer to reserve 45 rooms during weekends for low- and moderate-income people at no more than 50% of normal rates (with eligibility to be determined by guests' zip codes) in lieu of the commissions' more ambitious (and workable) proposal" (ibid.).

41. Ibid., 334. The 1981 amendment to § 30213 (SB 1581) was sponsored by State Senator Alan Sieroty, a democrat representing District 22 (ibid.). In 1971, representing District 59 in the state assembly, Sieroty carried AB 1471 – the substantive precursor to the California Coastal Act (ibid., 39).

42. A potential issue may be whether or not the \$30,000/25% fee constitutes rate fixing in violation of § 30213. It could be argued that the \$30,000/25% fee functions as a de-facto cap on room rates, in that the fee may discourage higher hotel room rates or incentivize lower hotel room rates. However, such results are likely not tantamount to the fixing of room rates, because the CCC is not strictly forbidding rates above or below a singular price point.

The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.⁴³

2.2.2. The LCOVA Mitigation Toolbox

The \$30,000/25% fee is not the only tool the CCC employs in furtherance of the LCOVA mitigation policy. These tools are forms of exactions—requirements imposed by the government as conditions of approval for a development permit in order to offset or mitigate public harms created by the development.⁴⁴ As a condition for approval, the government may either exact property (a property exaction) or money (a monetary exaction)⁴⁵ from the applicant.

The CCC's LCOVA mitigation property exaction tool is the on-site LCOVA facility development requirement. In a number of cases, the CCC required hotel developers to build a tent campground on-site to mitigate the perceived limited affordability of the hotel development.⁴⁶ The \$30,000/25% fee, the subject of this report, is the CCC's monetary exaction tool in LCOVA mitigation toolbox.

43. Cal. Pub. Res. Code § 30222.

44. The federal and California legal standards governing exactions are discussed in Chapter 6 of this report.

45. The two types of monetary exactions, ad hoc fees and legislatively imposed fee, are discussed in Chapter 6 of this report.

46. California Coastal Commission, *Public Workshop: Lower Cost Visitor Serving Accommodations* (December 10, 2014), 16-17. Cases where the CCC required on-site mitigation include: "1) Appeal No. A 71-78 for the City of Long Beach Convention Hotel resulted in 70 RV camping sites at the Golden Shore RV Resort. 2) Appeal No. 55-80 for Lifetime Communities/Santa Catalina Island Company resulted in 120 camping sites at Hermit Gulch Campground on Catalina Island. 3) CDP 3-82-171 for the Ventana Inn in Big Sur resulted in 100 camping sites at Ventana Campground. 4) Appeal No. A-3-SMC-89-063 for Gould, San Mateo County resulted in 112 RV sites and 76 tent camping sites at Costanoa, just south of Pigeon Point Lighthouse" (ibid.).

Chapter 3. LCOVA In-Lieu Fee Formulation

The CCC generally applies the following three-pronged approach to formulate the LCOVA in-lieu fee:

1. Define local lower, moderate, and higher cost rates,
2. Determine the per room in-lieu fee, and
3. Establish an in-lieu fee account.

This approach generally results in the CCC imposing the \$30,000/25% fee. This chapter dissects the above approach and explains its constituent elements. As discussed in Chapters 1 and 2, the CCC has imposed the \$30,000/25% fee in review of development permits as well as LCP and related policies. The CCC has not applied the three-prong approach uniformly across all cases. Chapter 4 delves into and highlights key variations in application of the three-prong approach.

3.1. Defining Local Low, Moderate, and High Cost Rates

In the past, the CCC generally considered a LCOVA hotel as one that charges \$100 or less per room per night.⁴⁷ First applied in the Ventura LCP Amendment case in 2008, the CCC now uses a formula to calculate three ranges of hotel costs—low, moderate, and high—in the relevant region.⁴⁸ These ranges are based on the statewide average daily rate (“ADR”) of California hotels. ADR is “[a] measure of the average rate paid for rooms sold, calculated by dividing room revenue by rooms sold.”⁴⁹

Discussed in further detail below, the formula involves three steps:

1. Determine the statewide ADR,
2. Set the geographic zone of local hotels surveyed, and
3. Identify the low, moderate, and high-cost ranges in the relevant local area.

The CCC’s in-lieu fee is triggered at the high-cost range. As noted below, the CCC considers some types of overnight accommodations to be “inherently lower cost” (i.e., LCOVA facilities):

47. California Coastal Commission, San Diego Area Office, *Addendum to Item Th16e, Coastal Commission Permit Application #6-13-0407 (McMillin-NTC, LLC), for the Commission Meeting of February 13, 2014, Th16e-2-2014* (San Diego, CA, 2014), 29. This staff report includes revised findings concerning the 2200 Lee Court Project in San Diego, CA, the fourth case study presented in this Chapter 4 of this report.

48. South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 33. “More recent Commission actions have utilized a formula that can be used to determine low and high cost overnight accommodations for a specific part of the coast [SBV-MAJ-2-08 & 5-98-156-A17]” (ibid.).

49. STR Global, “A Guide to Our Terminology,” last modified 2015, <https://www.strglobal.com/resources/glossary>

The formula is based on California hotel and motel accommodations (single room, up to double occupancy), and does not incorporate hostels, RV [recreation vehicle] parks, campgrounds or other alternative accommodations into the equation, as these facilities do not provide the same level of accommodation as hotels and motels. Hostels, RV parks, and campgrounds are inherently lower cost, and are the type of facilities that a mitigation charge for the loss of affordable overnight accommodations would support.⁵⁰

The CCC has recently reconsidered whether RV parks are “inherently low cost.” RV parks 2014 CCC staff report explains that RV sites may not always constitute LCOVA facilities after accounting for the cost of purchasing and maintaining the RV itself.⁵¹

3.1.1. Determine Statewide Hotel Average Daily Rate

In 2007, the CCC obtained the Statewide ADR from Smith Travel Research (“STR”) trend reports within the following parameters.

1. The survey included California hotels and motels (here, referred to collectively as “hotels”), participating in STR’s trend surveys, and
2. From that universe, considers only AAA Auto Club-rated properties (one, two, three, four, or five diamond) to ensure an acceptable level of quality.⁵²
3. The CCC used peak season (July and August) average monthly ADR.⁵³

Based on the STR data,⁵⁴ the CCC determined the Statewide ADR to be \$132.90 at peak season in 2007.⁵⁵ The CCC still relies on the 2007 Statewide ADR in cases today. According the CCC, the 2007 figure remains valid because the Statewide ADR has experienced little fluctuation since 2007 – falling to only \$128.93 in 2013.⁵⁶ However, it is unclear whether the 2013 \$128.93 ADR figure considered only AAA-rated properties. As detailed in Chapter 5, the Great Recession’s end in 2009 and hotel market’s upturn in 2014 likely rendered the CCC’s 2007 ADR and 2013 ADR irrelevant.

50. South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 33.

51. California Coastal Commission, *Public Workshop: Lower Cost Visitor Serving Accommodations* (December 10, 2014), 9-10.

52. *Ibid.*

53. California Coastal Commission, South Coast Area Office, *Staff Report: Regular Calendar, Application No.: 5-13-0717, Applicant: 1429 Hermosa, LLC, F10a-6-2014* (Long Beach, CA, 2014), 17. This staff report addressed the permit application for a proposed 30-room boutique hotel to be constructed at 1429 Hermosa Avenue, Hermosa Beach, CA.

54. Interview with Smith Travel Research Trends Department Staff, August 21, 2014. The hotels included in the STR trend reports are typically of 10 rooms or more.

55. San Diego Area Office, *6-13-0407 (McMillin-NTC, LLC)*, 30.

56. *Ibid.*, 29-30.

3.1.2. Geographic Zone of Local Hotels Surveyed

With the Statewide ADR determined, the CCC builds an inventory of local hotels to survey. There are two steps to building the inventory. First, the CCC sets the geographic zone for hotels. This zone is defined by two characteristics:

1. The political boundary (the city or county), and
2. The distance from the coastline (the California Coastal Zone or Five-Miles from the coastline (the “Five-Mile Zone”).

The case studies in Chapter 4 will show that the CCC has varied in its application of these characteristics. Second, the CCC generally applies the following parameters to arrive at a list of hotels within the zone:

1. The CCC only surveys AAA-rated properties, and
2. The CCC considers rates during peak season (July and August).⁵⁷

3.1.3. Identify the Local Low, Moderate, and High Cost Ranges

Using the statewide and local ADR data, the CCC identifies the local low, moderate, and high-cost ranges using the following equations:

The CCC considers the aggregated ADR for local hotels that fall below the Statewide ADR (the “Local Low ADR”).⁵⁸ The Local Low ADR is divided by the Statewide ADR to generate, what this report refers to as, the Local ADR Quotient. 1 minus the Local ADR Quotient calculates a range (“Cost Range”) applied above and below the Statewide ADR to identify the lower, moderate, and higher cost ranges.

To better illustrate the CCC’s process described above, an expanded equation is shown in Figure 1.

57. South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 33.

58. San Diego Area Office, *6-13-0407 (McMillin-NTC, LLC)*, 31.

Statewide ADR = Determined by the CCC survey
 Local Low ADR = Local ADR for hotels surveyed with ADRs lower than the Statewide ADR
 Local ADR Quotient = Local ADR / Statewide ADR

 Cost Range = $(1 - \text{Local ADR Quotient}) * \text{Statewide ADR}$

 Local High Cost Point = Statewide ADR + Cost Range
 Local Low Cost Point = Statewide ADR – Cost Range *and* = Local Low ADR

 Local Low Cost Range < Local Low Coast Point
 Local Moderate Cost Range \geq Local Low Cost Point *and* \leq Local High Cost Point
 Local High Cost Range > Local High Cost Point

Figure 1. Expanded Equation for Local Low, Moderate, and High Cost Ranges

The equation in Figure 1 shows more steps than presented in CCC staff reports, but the additional steps are mathematically consistent with the CCC’s process. Figure 2 below shows the expanded equations using hypothetical values of \$100 for the Statewide ADR and \$90 for the Local Low ADR.

Statewide ADR = \$100
 Local Low ADR = \$90
 Local ADR Quotient = $\$90 / \$100 = 0.90$

 Cost Range = $(1 - 0.90) * \$100 = \10

 Local High Cost Point = $\$100 + \$10 = \$110$
 Local Low Cost Point = $\$100 - \$10 = \$90$ *and* = Local Low ADR

 Local Low Cost Range < \$90
 Local Moderate Cost Range \geq \$90 *and* \leq \$110

Figure 2. Expanded Equation Hypothetical

The expanded equation serves two purposes:

- Allows the CCC’s process to be diagrammed in Figure 3, and
- Provides a clearer comparison in its application across case studies in Chapter 4.

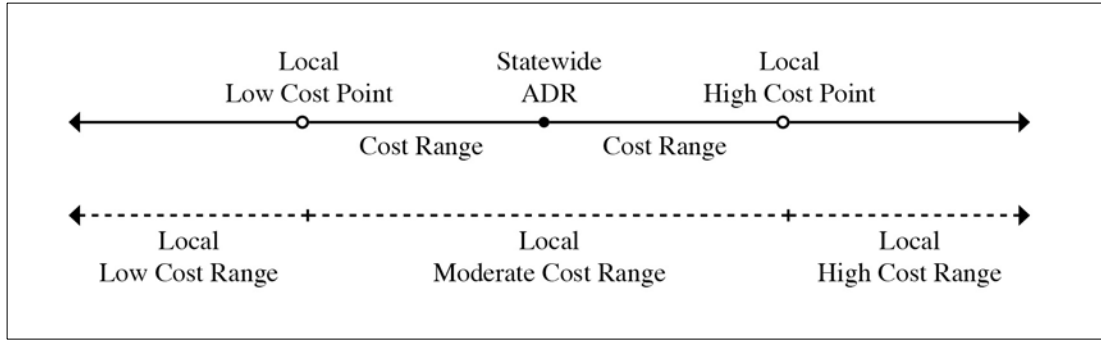


Figure 3. Diagram of Local Low, Moderate, and High Hotel Cost Ranges

The CCC’s trigger for imposing in-lieu fees is the Local High Cost Range—rates above the Local High Cost Point.⁵⁹ Table 1 below demonstrates this formula’s results from hypothetical proposed hotels:

Table 1. Hypothetical Applications of the CCC In-Lieu Fee Trigger Formula

Hotel	Local ADR	Local Low ADR	Statewide ADR	Local Quotient	Cost Range	Local High Cost Range
Hotel A	\$125	\$90	\$150	0.60	\$60	> \$210
Hotel B	\$130	\$100		0.67	\$50	> \$200
Hotel C	\$150	\$110		0.73	\$40	> \$190
Hotel D	\$140	\$120		0.80	\$30	> \$180

There is an inverse relationship between the Local Low ADR and the Local High Cost Range (the in-lieu fee trigger). Hotels in areas with lower Local Low ADRs will have a higher Local High Cost Range, meaning that the in-lieu fee is triggered at a higher rate. As discussed in the section below, the CCC typically imposes the \$30,000/25% fee. For example, Hotel A is proposed for an area with a Local Low ADR of \$90. Based on the formula, Hotel A’s developers would pay \$30,000 for 25 percent of rooms with rates greater than \$210. Hotel B, proposed in an area with a Local Low ADR of \$110 would trigger the in-lieu fee for rooms with rates greater than \$210. A higher High Cost Point likely means that fewer rooms will be penalized by the in-lieu fee.

The overall ADR for the local area is not a factor in the formula. Consider the following: Hotel C and Hotel D are proposed in areas with respective Local ADRs of \$150 and \$140. However, because Hotel C’s area’s Local Low ADR is lower than that of Hotel D’s area, Hotel C’s in-lieu fee is triggered at a higher point.

Further, because the equation only considers the ADR of local hotels below the Statewide ADR, the equation will in theory always produce a Local High Cost Point. Therefore,

59. South Coast Area Office, 5-13-0717, 1429 Hermosa, LLC, 18.

the equation will always trigger an in-lieu fee. Hotel A is proposed in an area with a Local ADR below the statewide average, but the formula still triggers an in-lieu fee for the development.

3.2. Determining the Per Room In-lieu Fee

In a number of decisions, the CCC imposed the \$30,000/25% fee (\$30,000 for 25% of rooms) for hotel projects' room rates that fall in the Local High Cost Range.⁶⁰ The CCC derived the \$30,000 figure from information provided to the CCC by Hostelling International ("HI") in a letter dated October 26, 2007.⁶¹ The CCC explains:

The figures provided by HI are based on two models for a 100-bed, 15,000 sq. ft. hostel facility in the Coastal Zone. The figures are based on experience with the existing 153-bed, HI-San Diego Downtown Hostel. Both models include construction costs for rehabilitation of an existing structure. The difference in the two models is that one includes the cost of purchase of the land and the other is based on operating a leased facility. Both models include "Hard" and "Soft Costs" and startup costs, but not operating costs. "Hard" costs include, among other things, the costs of purchasing the building and land and construction costs (including a construction cost contingency and performance bond for the contractor). "Soft" costs include, among other things, closing costs, architectural and engineering costs, construction management, permit fees, legal fees, furniture and equipment costs and marketing costs. Based on these figures, the total cost per bed for the two models ranges from \$18,300 for the leased facility to \$44,989 for the facility constructed on purchased land.⁶²

The CCC arrived at the \$30,000 amount by taking the rough average between the per bed costs in the two models.⁶³ In some cases, the CCC adjusts the fee to inflation.⁶⁴ From a review of case studies, Chapter 4 will show that there is some flexibility in application of the \$30,000/25% fee. Chapter 7 will explain that the 2007 HI letter is likely a conflicted source, due to HI's frequent receipt of LCOVA in-lieu fee funds.

3.3. Establishing an In-Lieu Fee Account

Finally, the CCC then requires the creation of an interest-bearing account to hold the in-lieu fees.⁶⁵ The fees are to be distributed as "grants to public agencies or non-profit

60. South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 35.

61. San Diego Area Office, *6-13-0407 (McMillin-NTC, LLC)*, 33.

62. *Ibid.*

63. California Coastal Commission, South Central Coast Area Office, *Agenda Items 11a and 11b, City of San Buenaventura Local Coastal Program (LCP) Amendment SBV-MAJ-1-08 [Midtown Corridor Development Code-Main Street and Thompson Boulevard] and SBV-MAJ-2-08 [Downtown Specific Plan] for Public Hearing and Commission Action at the California Coastal Commission hearing of November 5, 2009 in Long Beach, Th11a-11-2009* (Ventura, CA, 2009), 28. The City of Buenaventura commonly known as the City of Ventura. This staff report concerns the first case study presented in Chapter 4 of this report.

64. South Coast Area Office, *5-13-0717, 1429 Hermosa, LLC*, 18.

65. *Ibid.*

organizations for the provision of LCOVA facilities within or in close proximity to the coastal zone.”⁶⁶

In past actions, the CCC allowed the jurisdiction (e.g., the applying city) to select from a list of entities to manage the account.⁶⁷ The CCC Executive Director must approve the selection. These options have included:

- The jurisdiction itself,
- Hostelling International USA,
- California State Coastal Conservancy,
- California Department of Parks and Recreation, or
- A similar entity.⁶⁸

A management plan for the account must be reviewed and approved by the CCC Executive Director. The management plan must include:

- Details of how deposits into the account will be processed,
- Investment strategies to ensure a reasonable rate of return, and
- Guidelines for how grants for LCOVA facilities will be managed (i.e., applications, selection process, oversight).⁶⁹

There is some conflicting information regarding establishment of these accounts when required through an LCP update or similar application. CCC staff reports suggest that one account would be created to hold in-lieu fees for subsequent projects approved under the LCP.

66. Ibid.

67. Ibid., 9.

68. Ibid., 18.

69. Ibid., 9-10.

Chapter 4. Case Studies

Chapter 3 identified and detailed the CCC's three-prong approach for formulating the LCOVA in-lieu fee. This chapter reviews four case studies that highlight incidents of flexibility and variance by the CCC in applying this approach:

- **City of Ventura, LCP Amendment (2008):** This case represents the first instance where the CCC applied the three-prong approach. Further, this case highlights the CCC's possible openness to consider an alternative approach.
- **City of Long Beach, LCP Amendment (2010):** This case features two notable deviations from CCC's standard approach by using a small sample of hotels as the local inventory in a select part of the coast line and relying on another jurisdiction's data to set the in-lieu fee trigger.
- **City of Solana Beach, LCP Land Use Plan (2012):** In this case, the CCC delegated much of the local hotel inventory data procurement and cost range determination to the local jurisdiction.
- **City of San Diego, 220 Lee Court Project (2014):** Unlike the other three cases, this case study regards an individual development project. This case is of interest because the CCC exercised considerable flexibility in its determination of the per-room in-lieu fee.

The case studies are structured by its three-prong approach to the LCOVA in-lieu fee. Table 2 provides a summary of the findings:

Table 2. Summary of Case Study Findings

City of Ventura, LCP Amendment (2008)	City of Long Beach, LCP Amendment (2010)	City of Solana Beach, LCP Land Use Plan (2012)	City of San Diego, 2200 Lee Court Project (2014)
Defining Local Low, Moderate, and High Cost Hotel Rates			
Standard formula applied to hotels in the City of Ventura Coastal Zone.	Three variations: (1) only considered downtown coastline, (2) used a sampling of hotels, and (3) relied on comparisons to City of Ventura.	The CCC delegated accounting of hotel cost ranges to the City, stating that a suitable method would include an inventory of hotels in San Diego County within the Five-Mile Zone.	The CCC included two variations to the standard formula for the Statewide ADR and the Local High Cost Point. The relevant area included hotels in San Diego County within the Five-Mile Zone.
Determining the Per Room In-Lieu Fee			
\$30,000/25% fee applied, however the CCC shows some room for flexibility.	\$30,000/25% fee applied, with two exceptions: (1) \$1.5 million fee for a specific project and (2) provided an alternative mitigation to the \$30,000/25% fee.	\$30,000/25% fee applied, but adjusted for inflation.	The CCC imposed a \$30,000/12.5% fee given the development's proposed free amenities and accommodation of rooms for more guests.
Establishing an Account to Hold and Distribute In-Lieu Fees			
The City has yet to collect any in-lieu fees or establish an account.	Standard language on account creation.	According to City policy, the City will create and manage the account, but has yet to do so.	No direct call for creation of an account

4.1. City of Ventura, LCP Amendment (2008)

In 2008, The City of Ventura submitted an amendment to its LCP to the CCC for approval. As mentioned earlier, this case was the first instance in which CCC used the formula to determine low, moderate, and high-cost categories for hotel rooms in a particular locale.⁷⁰

4.1.1. Defining Local Low, Moderate, and High Cost Rates

The CCC applied the three-step formula as described in Chapter 3. For the second step, defining the geographic zone of local hotels for survey, the CCC used City of Ventura as the political boundary and “the City of Ventura Coastal Zone” for the distance from the coastline.⁷¹

70. South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 33.

71. South Central Coast Area Office, *City of San Buenaventura SBV-MAJ-2-08*, 20.

The staff report did not further specify distance from the coastline. The Higher Cost Point was subsequently defined as 25 percent greater than the Statewide ADR.⁷²

4.1.2. Determining the Per Room In-Lieu Fee

To receive approval for the LCP amendment, the CCC recommended that Ventura include the \$30,000/25% mitigation measure to provide for low-cost lodging.⁷³ Opposed to the broader general application of the \$30,000/25% fee above, Ventura requested, and the CCC agreed to consider, that an alternative local threshold be applied. However, according to a CCC staff report, Ventura staff failed to come forth with an alternative.⁷⁴

4.1.3. Establishing an In-Lieu Fee Account

According to City of Ventura staff, Ventura has yet to collect any LCOVA in-lieu fees from coastal development under the approved amendment and has not established an account for this purpose.⁷⁵

4.2. City of Long Beach, LCP Amendment (2010)

In 2010, the City of Long Beach submitted to the CCC an amendment to the City's LCP. The amendment concerned one designated area of the LCP: Downtown Shoreline Planned Development District (PD-6). The purpose of the amendment was to incorporate into PD-6 the Golden Shore Master Plan—a development project featuring new hotel construction.⁷⁶ Following certification by the CCC, the amendment was codified into ordinance.⁷⁷

4.2.1. Defining Local Low, Moderate, and High Cost Rates

In this case, the CCC strayed from the formula applied in the Ventura case in three ways:

1. Considering hotels in only one area of Long Beach's coastline,
2. Drawing only a sample of hotels from that area, and
3. Relying on a comparable city's (Ventura) data instead of applying the formula to Long Beach hotels. These variations are explained further below.

72. Ibid., 21.

73. Ibid., 3-4.

74. Ibid.

75. Interview with City of Ventura, Community Development Department Staff, July 24, 2014.

76. South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 1.

77. Long Beach, California, Ordinance No. ORD-11-0017.

First, the CCC looked at hotels within the Downtown Shoreline area.⁷⁸ This is a relatively narrower area than that used in the Ventura case (Coastal Zone the City of Ventura).

Second, the CCC considered only a sample of hotels in this area, explaining that “[a] similar comprehensive study [referencing the Ventura case] of all the hotels in Long Beach has not been conducted, although a sampling (2009) of the hotels in or near the Downtown Shoreline area has been done.”⁷⁹ The CCC staff report did not expand on the parameters. Based on this review, the CCC found that there are no affordable hotels within the Downtown Shoreline area.⁸⁰

Third, to determine the low, moderate, and high cost ranges, the CCC did not apply its formula to the sample drawn of Long Beach hotels in the Downtown Shoreline area. Instead, it relied on figures from the Ventura case. As explained in the CCC staff report:

The hotel room rates in Long Beach are similar to Ventura’s rates. Therefore, the definition of low cost accommodations in Long Beach will be defined (for the suggested modification pertaining to Subarea 1a) as those charging less than seventy-five percent (75%), or twenty- five percent (25%) below, the statewide average daily room rate during peak season.⁸¹

Like in the Ventura case, the local High Cost Point in the Long Beach Case was subsequently defined as 25 percent greater than the Statewide ADR.⁸²

4.2.2. Determining the Per Room In-Lieu Fee

The CCC applied the \$30,000/25% fee in the Long Beach case,⁸³ with two exceptions. The first exception is specific to the first to phases of the Golden Shore Master Plan:

A new hotel, with at least one hundred rooms, shall be provided as part of the first or second phase of the implementation of the Golden Shore Master Plan, or a mitigation charge of \$1.5 million shall be paid by the applicant into an interest-bearing account, to be established and managed by the City of Long Beach.⁸⁴

The CCC explained that “[t]he \$1.5 million mitigation charge is equivalent to the cost of a new 82-bed hostel (at \$18,300 a bed) on leased land.”⁸⁵ This diverges from the CCC’s practice in other cases in two respects: First, as described earlier in this report, the CCC arrived at the

78. Ibid., 34.

79. Ibid.

80. Ibid.

81. Ibid.

82. Ibid.

83. Ibid., 30, 36. Chapter 7 discusses how, as adopted by Long Beach, the \$30,000/25% fee may apply to all hotel rooms, not only higher cost rooms.

84. Ibid., 29.

85. Ibid.

\$30,000 figure by taking the rough average between “\$18,300 for the leased [hostel] facility” and “\$44,989 for the [hostel] facility constructed on purchased land.”⁸⁶ Second, the \$1.5 million is a lump sum that is not tied to a particular portion of rooms.

In the second exception, the CCC staff report provides an alternative mitigation method:

As an alternative to the payment of the mitigation charge, and as an alternative to providing lower cost overnight visitor accommodations within Sub-area 1a of PD-6 (Golden Shore Master Plan Site), the applicant may, subject to review and approval by the City Planning Commission and/or City Council, provide for the completion of a specific project (e.g., a youth hostel) that provides lower cost overnight visitor accommodations at a minimum ratio of one (1) bed for each new hotel room constructed on the Golden Shore Master Plan site that does not qualify as a “lower cost” visitor room. The applicant’s specific project shall provide a minimum of one hundred (100) beds - up to a maximum of two hundred (200) beds. The alternative project shall be located within the City of Long Beach coastal area, defined as the area within one-half mile of the inland boundary of the City’s coastal zone.⁸⁷

4.2.3. Establishing an In-Lieu Fee Account

The CCC staff report did not expand beyond the standard language described earlier in this report.⁸⁸

4.3. City of Solana Beach, LCP Land Use Plan (2012)

In 2012, the CCC reviewed the City of Solana Beach’s Local Coastal Plan Land Use Plan (“LCP LUP”).⁸⁹ The Land Use Plan is a component of the Local Coastal Plan that specifies location and type of land and water uses in the Local Coastal Plan area. An LCP LUP may also contain strategies and policies that represent local conditions, goals and interests.

4.3.1. Defining Local Low, Moderate, and High Cost Rates

In the Solana Beach case, the CCC delegated much of the lower cost hotel definition process to the City’s LCP LUP. In the Ventura case discussed above and the 2200 Lee Court case in San Diego discussed later, CCC staff performed these calculations. The CCC approved the following language for Policy 2.33 of Solana Beach’s LCP LUP:

86. South Coast Area Office, 5-13-0717, 1429 Hermosa, LLC, 33. This description is also provided in the CCC Staff Report for the Long Beach case at LOB-MAJ-1-10 (1-10) *City of Long Beach*, 36.

87. South Coast Area Office, LOB-MAJ-1-10 (1-10) *City of Long Beach*, 30.

88. *Ibid.*, 31.

89. California Coastal Commission, San Diego Area Office, *Revised Findings on City of Solana Beach LCP Land Use Plan for Commission Meeting of June 13-15, 2012*, by Sherilyn Sarb, Deborah Lee, and Diana Lilly, Th24a-6-2012 (San Diego, CA, 2012), 1.

The City shall maintain an accounting of the number of existing motel and hotel rooms and room rates. When referring to overnight accommodations, lower cost shall be defined by a certain percentage of the Statewide average room rate as calculated by the Smith Travel Research website (www.visitcalifornia.com) or other comparable or similar website or study such as www.Calif.AAA.com. A suitable methodology would base the percentage on market conditions in San Diego County for the months of July and August and include the average cost of motels/hotels within five (5) miles of the coast that charge less than the Statewide average. High cost would be room rates that are 20% higher than the Statewide average, and moderate cost room rates would be between high and low cost. The range of affordability of new and/or replacement hotel/motel development shall be determined as part of the coastal development permit process and monitored as part of the City's inventory of overnight accommodations.⁹⁰

This language presents two major variations from the standard approach modeled in the Ventura case.

First, concerning the geographic zone of local hotels for survey, the CCC used San Diego County as the political boundary and “five (5) miles of the coast” as distance from the coastline.⁹¹ The Ventura case also involved an update to city policy, but cast a narrower political boundary surveying hotels within the city jurisdiction not the entire county.⁹² Also, the Ventura case used the Coastal Zone within the Ventura for distance from the coastline, while the Solana Beach case specified Five-Miles from the coast. Aside from difference in land area, varying zones will produce local hotel inventories with different price points and other characteristics. Figure 4 show the Coastal Zone (blue line) and Five Mile Zone (green line) for both the City of Ventura (light blue) and the County of San Diego (pink).⁹³

90. Ibid., 11.

91. Ibid.

92. South Central Coast Area Office, *City of San Buenaventura SBV-MAJ-2-08*, 20.

93. For a discussion of the methodology and sources for the data collection and analysis that produced the maps Chapter 5 of this technical report.

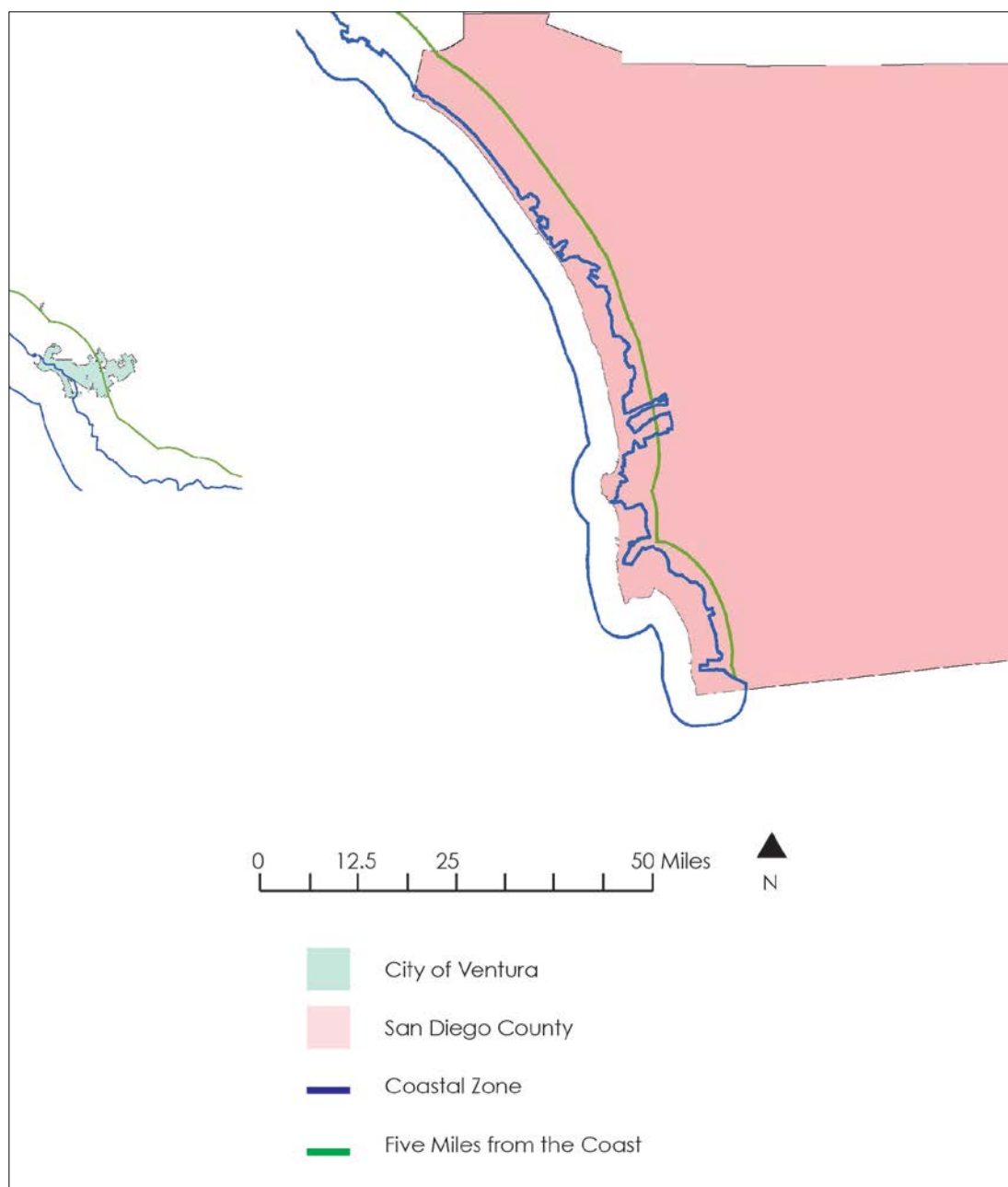


Figure 4. Coastal Zone and Five-Mile Zone for the City of Ventura and San Diego County

Second, the staff report for Solana Beach seems to not apply directly the low-cost formula to a sample of hotels in the determined relevant area. In this case, the CCC defines higher-cost hotel rooms as 20 percent above the State average, but that the “range of affordability of new and/or replacement hotel/motel development” will be determined on an on-going permit-by-permit basis.⁹⁴

94. San Diego Area Office, *Findings on Solana Beach LCP Land Use Plan*, 11.

4.3.2. Determining the Per Room In-Lieu Fee

For Solana Beach, the CCC applied the \$30,000/25% fee, but adjusted for inflation. The staff report states, “This payment (i.e. \$30,000 in 2007) is to be adjusted annually to account for inflation according to increases in the Consumer Price Index – U.S. City Average.”⁹⁵

4.3.3. Establishing an In-Lieu Fee Account

According to City staff, Solana Beach has yet to adopt a local implementation program or LCP, and therefore the City has not established its in-lieu fee account. However, the CCC approved the following language for Policy 5.8 in the City’s LCP LUP concerning the account:

The required monies [from the LCOVA in-lieu fees] shall be deposited into an interest-bearing account, to be established and managed by the City of Solana Beach. The purpose of the account shall be to establish lower cost overnight visitor accommodations within the City of Solana Beach as the first priority or elsewhere in North San Diego County coastal area as a second priority. The monies and accrued interest shall be used for the above-stated purpose, in consultation with the CCC Executive Director. Any development funded by this account will require review and approval by the Executive Director of the Coastal Commission and a coastal development permit.⁹⁶

4.4. City of San Diego, 2200 Lee Court Project (2014)

The 2200 Lee Court Project, proposed by McMillin-NTC, LLC, is located in San Diego’s Liberty Station. Unlike in the Ventura and Solana Beach case studies, which each involved updates to a city’s LCP, 2200 Lee Court is an individual development project pursued by a private developer. The site was formerly a US Naval Training Center under jurisdiction of the federal government, but was later transferred to City of San Diego in a public trust.⁹⁷ Despite certification of an LCP for the Naval Training Center area, the CCC retains permit authority of the project site as the land is held by public trust. The Project replaces an existing commercial parking lot with three hotels (650 rooms) and a separate 3,180 square foot restaurant building.⁹⁸ This case is of note because the CCC diverged from its standard cost formula and exercised considerable flexibility in its determination of the per-room in-lieu fee.

95. Ibid., 88-89.

96. Ibid., 51.

97. South Coast Area Office, 5-13-0717, 1429 Hermosa, LLC, 2.

98. Ibid.

4.4.1. Defining Local Low, Moderate, and High Cost Rates

Like the Solana Beach case, the CCC applied the following geographic zone for the local hotels to be surveyed: San Diego County⁹⁹ as the political boundary and “[h]otels in the coastal zone...within Five-Miles of the coast”¹⁰⁰ for distance from the coastline. To build the sample of hotels to be surveyed in the above zone, the CCC drew from 1-Diamond and 2-Diamond hotels listed on the AAA Auto Club Website. The list yielded 25 hotels, eight of which were in the “coastal zone.”¹⁰¹

In calculating the area’s cost categories, the CCC included two modifications to its standard cost formula:

- **Statewide ADR:** The CCC used the 2007 Statewide ADR (\$132.90) to calculate the Local ADR Quotient, but then applied that Local ADR Quotient to the 2013 Statewide ADR (\$128.93) to find the Cost Range.¹⁰²
- **Local High Cost Point:** The CCC rounded up the Cost Range for purposes of finding Local High Cost Point. The CCC explained that the purpose of this rounding was to provide a “conservative” result.¹⁰³

The CCC’s process in this case is detailed below in Figures 5 and 6:

2007 Statewide ADR = \$132.90
Local Low ADR = \$108.35
Local ADR Quotient = $\$108.35 / \$132.90 = 0.82$

2013 Statewide ADR = \$128.93
Cost Range for High = $(1 - 0.80 \text{ rounded down}) * \$128.93 = \$25.79$
Cost Range for Low = $(1 - 0.82) * \$128.93 = \23.21

Local High Cost Point = $\$128.93 + \$25.79 = \$154.72$
Local Low Cost Point = $\$128.93 - \$23.21 = \$105.72$

Local Low Cost Range < \$105.72
Local Moderate Cost Range $\geq \$105.72$ and $\leq \$154.72$
Local High Cost Range > \$154.72

Figure 5. Lee Court: Equations for Low, Moderate, and High Cost Ranges

99. San Diego Area Office, 6-13-0407 (McMillin-NTC, LLC), 31.

100. Ibid.

101. Ibid.

102. Ibid., 32-33.

103. Ibid., 32.

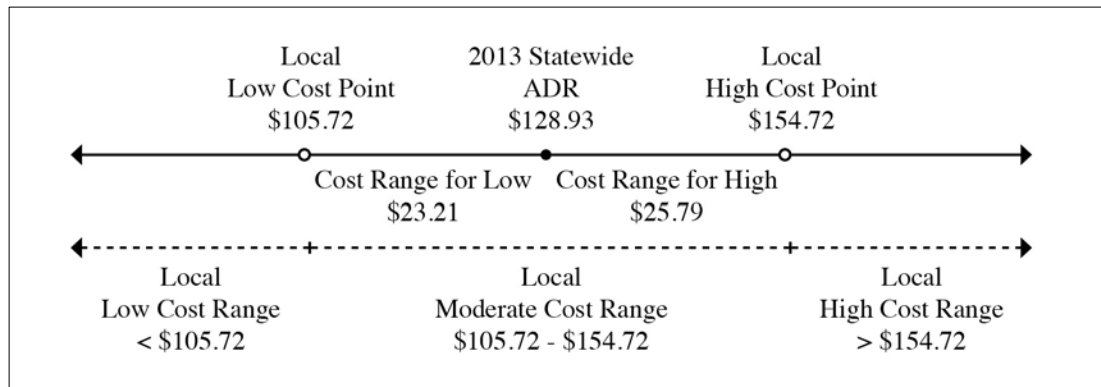


Figure 6. Lee Court: Diagram of Local Low, Moderate, and High Cost Ranges

4.4.2. Determining the Per Room In-Lieu Fee

As discussed earlier, the CCC typically applied a \$30,000 per room in-lieu fee for 25 percent of the total number of high-cost hotel rooms. However, in the case of 2200 Lee Court, the CCC applied the fee to only 12.5 percent of high-cost hotel rooms (compared to 25 percent of high cost rooms for Ventura and Solana Beach) for the Hotel 1 (the first of three hotels constructed).¹⁰⁴ At the time of the CCC's determination, Hotel 1 was slated to be 252-room all-suite hotel designed for operators such as the Embassy Suites or Spring Hill Suites. Hotel 1's projected rates were \$155 to \$190 per night, falling in the high-cost range. The CCC made its determination after the developer proposed the following arrangement for Hotel 1:

- All rooms would entail free Internet service, breakfast, and cocktail reception for guests, and
- 35 percent of the rooms would be outfitted to accommodate up to six people per room at the standard rate.¹⁰⁵

The CCC found that the free amenities alone were not sufficient for reclassifying the hotel rooms as moderately priced, since many hotels in the San Diego area provide such amenities as part of their daily rates.¹⁰⁶ However, the package of free amenities plus the agreement to configure 35 percent of the rooms for up to six people would increase overall affordability.¹⁰⁷

The adjusted in-lieu fee requirement cuts the developer's LCOVA in-lieu fee payment by nearly half. Applying the CCC's typical \$30,000/25% fee for 252 high-cost hotel rooms, the developer would pay \$1,890,000 $((0.25 * 252) * \$30,000 = \$1,890,000)$. Applying the adjusted \$30,000/12.5% fee, the CCC calculated the developer's payment at \$960,000. Because, 12.5

104. Ibid., 33.

105. Ibid.

106. Ibid., 34.

107. Ibid.

percent of 252 rooms totals 31.5 rooms, the CCC rounded the up to 32 to account for a whole number of rooms ($32 * \$30,000 = \$960,000$).¹⁰⁸ Rounding up to 32 rooms from 31.5 rooms adds \$15,000 to the total payment ($31.5 * \$30,000 = \$945,000$).

4.4.3. Establishing an In-Lieu Fee Account

In the staff report for this case, the CCC did not directly call for the creation of a mitigation fee account.

108. Ibid., 33.

Chapter 5. Hotel Inventories

As mentioned in Chapter 1, the CCC revisited its approach to LCOVA mitigation following its 2006 workshop study on the issue that showed less than 10 percent of hotels in California's nine most popular counties were considered lower cost.¹⁰⁹ Detailed in Chapter 3, the CCC's revamped approach to the LCOVA in-lieu fee relies on hotel ADR data in two key aspects of the three-prong approach:

- The CCC uses the STR-derived Statewide ADR trend reports as a benchmark for hotel costs along the California coast.
- The CCC builds local hotel inventories and applies a formula to determine the room rate at which the low-cost accommodation in-lieu fee will be triggered.

This chapter examine daily rate data for select hotel inventories to generate metrics to quantitatively evaluate the application of LCOVA mitigation, specifically the \$30,000/25% fee in Long Beach.

Following a discussion of methodology, three sets of analysis are presented in this chapter:

1. **California Statewide ADR:** The appropriate Statewide ADR determined by economic and market contexts and validity of calculation.
2. **California Coastal Premium:** The difference in cost between coastal hotels and all hotels statewide is examined for additional context for the CCC's approach to the LCOVA in-lieu fee.
3. **CCC Local Costs:** Using the Statewide ADR and the California coastal premium as context, the applicability of the CCC approach to the City of Long Beach and its region (Los Angeles County and Orange County) is examined.

The inventories (11 total) for these three sets of analysis are shown in Table 3.¹¹⁰

109. South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 33.

110. See Appendices A and B for complete hotel inventories and maps for the California coastal premium analysis and the CCC low cost analysis, respectively.

Table 3. Data Analysis Inventories

Political	Distance from the Coast
California Statewide ADR	
California	Statewide
California Coastal Premium	
California Coastal Counties	Coastal Zone
California Coastal Counties	Coastal Zone
California Coastal Counties	Five-Mile Zone
CCC Local Costs	
City of Long Beach	Coastal Zone
City of Long Beach	Five-Mile Zone
Los Angeles County	Coastal Zone
Los Angeles County	Five-Mile Zone
Orange County	Coastal Zone
Orange County	Five-Mile Zone
Los Angeles County and Orange County	Coastal Zone
Los Angeles County and Orange County	Five-Mile Zone

5.1. Methodology

The purpose of the data analysis in this section is to shed light on the hotel rate conditions in Long Beach in context of LCOVA mitigation. Therefore, every effort was made to follow the CCC's procedures as outlined in its staff reports. Instances where deviation from CCC procedure was unavoidable are documented. The data studied in this chapter is derived directly from STR trend reports – the service used by the CCC to obtain the Statewide ADR data-point. The methodology included two major elements: data collection and data analysis.

5.1.1. Data Collection

The data collection process included two components:

- Data collection for Statewide ADR inventory,
- Data collection for the California Coastal Premium and CCC Local Cost inventories.

The processes for both components are explained below.

5.1.1.1. Data Collection for Statewide ADR

The data for the Statewide ADR analysis was derived from two sources:

- A CCC staff report showing the 2007 and 2013 ADR figures discussed in Chapter 3,¹¹¹ and
- An STR trend report showing the July and August 2015 ADR for California statewide.

5.1.1.2. Data Collection for the Coastal Premium and CCC Local Cost Inventories

The data collection process discussed below explains how lists of hotels were constructed to request and obtain STR trend reports.

1. Obtain STR hotel participation lists for the 15 California coastal counties for inventory;
2. Obtain global positioning system (“GPS”) and use geographic information systems (“GIS”) analysis to determine which hotels are located in the Coastal Zone or the Five-Mile Zone; then
3. Obtain the AAA ratings, or lack thereof, for each hotel;
4. Compile lists to request STR trend reports for inventories.

5.1.1.2.1. STR Participation Lists

STR participation lists (lists of hotels participating in the company’s trend reports) were obtained for the 15 California coastal counties. The lists provide the following information for each hotel:

- Business name, city, and zip code;
- Months and years of participation in trend survey; and
- Class rating by STR (economy, midscale, upper midscale, upscale, upper upscale, and luxury).

In aggregate, the lists included 3,671 hotels.¹¹²

111. San Diego Area Office, 6-13-0407 (McMillin-NTC, LLC), 29-30.

112. The STR participation lists first obtained in two phases: First, on August 26, 2014, STR participation lists were created for the 15 California coastal counties, which included 3,642 unique hotels in the aggregate. Second, on September 24, 2015, an STR participation list was created of new California hotels participating since January 1, 2014, which included 29 new unique hotels in the California coastal counties. The 29 new unique hotels were added to the initial California coastal county participation lists, which increased the total unique hotels to 3,671.

5.1.1.2.2. Mapping Hotels in the Coastal Zone or Five-Mile Zone

As explained in Chapter 3, the CCC has used two different parameters for measuring distance from the coastline—the California Coastal Zone and the Five-Mile Zone. GIS was used to map hotels’ location in either zone. This process included three steps:

1. Obtain GPS coordinates and street address for each hotel on the filtered STR participation lists.¹¹³
2. Build GIS layers and buffers for the City of Long Beach,¹¹⁴ California coastal counties (from north to south: Del Norte,¹¹⁵ Humboldt,¹¹⁶ Mendocino,¹¹⁷ Sonoma,¹¹⁸ Marin,¹¹⁹ San Francisco,¹²⁰ San Mateo,¹²¹ Santa Cruz,¹²² Monterey,¹²³

113. For the 2014 phase, the hotels’ respective GPS coordinates and street addresses were obtained from two sources: An Oddity Software hotel database and Google Maps.

114. Los Angeles County Enterprise GIS, “City of Long Beach,” last modified 2013, <http://egis3.lacounty.gov/dataportal/2014/06/18/city-boundaries/>

115. County of Del Norte, Department of Information Technology, “Del Norte County,” last modified 2014, <http://www.co.del-norte.ca.us/departments/information-technology/geographic-information-services-gis>

116. Humboldt County, Business & Building Services, “Humboldt County,” last modified 2004, <http://humboldtgov.org/276/GIS-Data-Download>

117. Marine Pollution Studies Laboratory-Moss Landing Marine Laboratories, “Mendocino County,” last modified 2007, <http://swamp.mpsl.mlml.calstate.edu/resources-and-downloads/database-management-systems/swamp-25-database/templates-25/gis-shapefile-layers>

118. Sonoma County, Permit and Resource Management Department, “Sonoma County,” last modified 2010, http://www.sonoma-county.org/prmd/gisdata/data_download.htm

119. MarinMap, “Marin County,” last modified 2014, <http://www.marinmap.org/DNN/Data/GISDataDownload.aspx>

120. City and County of San Francisco, SF OpenData, “San Francisco County,” last modified 2014, <https://data.sfgov.org/Geographic-Locations-and-Boundaries/Bay-Area-Counties-Zipped-Shapefile-Format-/cntd-ggej>

121. Ibid.

122. Ibid.

123. Monterey County, “Monterey County,” last modified 2014, http://montereycountyopendata.montereyco.opendata.arcgis.com/datasets?q=county+boundary&sort_by=relevance

San Luis Obispo,¹²⁴ Santa Barbara,¹²⁵ Ventura,¹²⁶ Los Angeles,¹²⁷ Orange,¹²⁸ and San Diego¹²⁹), Coastal Zone,¹³⁰ and Five-Mile Zone.¹³¹

3. Based on the obtained GPS coordinates, map the hotels in the coastal counties that fall in the Coastal Zone or the Five-Mile Zone.¹³²

Of the 3,671 hotels on the participation lists, 673 were located within the Coastal Zone or the Five-Mile Zone.

5.1.1.2.3. AAA Ratings

As explained in Chapter 3, the CCC builds inventories of local hotels for calculating the in-lieu fee trigger. For the local inventory, the CCC only considers AAA-rated hotels as a quality control measure. AAA-published guidebooks for Northern and Southern California¹³³

124. California Polytechnic State University, "San Luis Obispo County," last modified 2013, <http://lib.calpoly.edu/gis/browse.jsp?by=c&c=2>

125. County of Santa Barbara, "Santa Barbara County," last modified 2013, <http://www.countyofsb.org/gis/default.aspx?id=28>

126. County of Ventura, "Ventura County," last modified 2014, <http://www.ventura.org/gis-mapping/gis-data-downloads-political>

127. Los Angeles County Enterprise GIS, "Los Angeles County," last modified 2013, <http://egis3.lacounty.gov/dataportal/2014/06/18/city-boundaries/>

128. Orange County, "Orange County," last modified 2013, <http://ocdata.giscloud.com/>

129. SanGIS, "San Diego County," last modified 2014, <http://www.sangis.org/>

130. California Department of Fish and Wildlife, "California Coastline," last modified 2004, <http://www.dfg.ca.gov/marine/gis/downloads.asp>; Los Angeles County Enterprise GIS, "California Coastal Commission Zone Boundary," last modified 2009, <http://egis3.lacounty.gov/dataportal/2011/06/06/california-coastal-commission-zone-boundaries/>

131. The inland Coastal Zone boundary was retrieved from the Los Angeles County GIS Data Portal, while the western boundary was created from a three-mile buffer from the California coastline. These boundaries were layered on top of the data for the California coastal counties and the City of Long Beach. A five-mile buffer east of the coastline was layered on top of the county and city data in order to compare the Coastal Zone boundary with the five-mile boundary.

132. For the 29 hotels added from the September 24, 2015 STR participation list, GPS coordinates and street addresses were obtained from Google Maps. The hotels' distance from the coast was obtained using the measuring tool on Google Earth. The hotel's location relative to the Coastal Zone was obtained by applying Coastal Zone boundary to Google Earth (Caltrans, "Coastal Zone," accessed September 1, 2015, <https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&cad=rja&uact=8&ved=0CB0QFjAAahUKEwjQyJE25rIAhUTWYgKHeX4DgE&url=http%3A%2F%2Fsvctenvims.dot.ca.gov%2Fwqpt%2Fcontent%2Fkml%2FCoastalZone.kmz&usg=AFQjCNGGdVX45holns2Uu5TiuYtipeU0ag&bvm=bv.103388427,d.cGU>). Of the 29 hotels added, 14 were located in the Coastal Zone or the Five-Mile Zone.

133. American Automobile Association, *TourBook Guide: Northern California*, 2014 ed. (Heathrow, FL: AAA Publishing, 2013); American Automobile Association, *TourBook Guide: Southern California*, 2014 ed. (Heathrow, FL: AAA Publishing, 2013).

were used to obtain the AAA rating (one, two, three, four, or five diamonds), or lack thereof, for each hotel in the filtered STR participation lists.¹³⁴

Of the 673 hotels located in the Coastal Zone or the Five-Mile Zone, 471 were AAA-rated.¹³⁵

5.1.1.2.4. Compiling Lists for STR Trend Reports

Shown above, the first three steps generated a list of 471 hotels that participate STR surveys, are located in the Coastal Zone or Five-Mile Zone, and are AAA-rated. The data analysis inventories are composed from this list of 471 hotels. The hotel counts for each inventory are shown in Table 4.

Table 4. Inventory Hotel Counts

Area	Coastal Zone			Out Coastal Zone, In Five-mile Zone			Five-mile Zone (Total)		
	AAA	Non-AAA	Total	AAA	Non-AAA	Total	AAA	Non-AAA	Total
For California Coastal Premium									
California Coastal Counties	228	87	315	243	115	358	471	202	673
For CCC Local Cost									
City of Long Beach	5	1	6	12	9	21	17	10	27
Los Angeles County	27	16	43	74	25	99	101	41	142
Orange County	26	8	34	16	6	22	42	14	56
Los Angeles County and Orange County	53	24	77	90	31	121	143	55	198

Using the data collected in the steps above, eight lists for STR trend reports provide the ADR for July and August 2015 for each inventory. Explained below in this chapter, not all eight trend report request lists, shown in Table 5, map exactly with the studied inventories.

134. For the 14 hotels from the September 24, 2015 STR participation list located in the Coastal Zone or Five-Mile Zone, AAA ratings, or lack thereof, were obtained through the AAA website (Automobile Club of Southern California (AAA), "Advanced Hotel Search," accessed September 30, 2015, <http://secure.rezserver.com/hotels/home/?refid=5733>). Of the 14 hotels, seven were AAA rated. See Appendix D for a listing of the seven hotels.

135. See Appendix C for counts and percentages pertaining to AAA ratings and the hotel inventories.

Table 5. STR Trend Report Request Lists

List No.	Geographic Zone		Hotel Count
	Political	Distance from the Coast	
For California Coastal Premium			
1	CA Coastal Counties	Coastal Zone	228
2	CA Coastal Counties	Five-Mile Zone	471
For CCC Inventory Costs			
3	City of Long Beach	Outside the Coastal Zone, inside the Five-Mile Zone	12
4	City of Long Beach	Five-Mile Zone	17
5	Los Angeles County	Coastal Zone	27
6	Los Angeles County	Five-Mile Zone	101
7	Orange County	Coastal Zone	26
8	Orange County	Five-Mile Zone	42

5.1.2. Data Analysis

The three sets of data analysis—the California Statewide ADR, California coastal premium, and CCC local costs—required different datasets and, at times, variations from the above collected data.

5.1.2.1. Data Analysis for the Statewide ADR Inventory

Analysis to determine the appropriate Statewide ADR includes comparative review of each statewide ADR figures’ economic and market contexts and consistency with stated CCC practices.

5.1.2.2. Data Analysis for the California Coastal Premium Inventories

The coastal premium is calculated by taking the difference of the coastal counties ADR for the Coastal Zone and Five-Mile Zone, respectively, from the Statewide ADR. For perspective, the premium was placed in the context of data on household travel expenditures from the United States Department of Labor’s Bureau of Labor Statistics.¹³⁶

5.1.2.3. Data Analysis for the CCC Local Cost Inventories

There are two parts to the analysis for each CCC local cost inventory:

- Examining the local ADR, and
- Applying the CCC’s formula for setting the in-lieu fee trigger.

136. Bureau of Labor Statistics, United States Department of Labor, “Travel Expenditures, 2005–2013: Domestic and International Patterns in Recession and Recovery,” *Monthly Labor Review* (March 2015).

5.1.2.3.1. Local ADR

To examine the local ADR for each inventory, the average ADR from July and August 2015 were obtained from each list's respective STR trend report, with three exceptions:

- **City of Long Beach – Coastal Zone:** An STR trend report could not be produced for the City of Long Beach – Coastal Zone. This inventory exceeded STR's limit of 40 percent of one brand per list (Hyatt constituted 43 percent of ownership). Instead, two lists were used to derive data for this inventory: City of Long Beach – Outside Coastal Zone, Inside Five-Mile Zone and City of Long Beach – Five-Mile Zone. The 17 hotels on the Five-Mile Zone list includes all five hotels on the Coastal Zone list and all 12 hotels on the Outside Coastal Zone, Inside Five-Mile list. The results from the Outside Coastal Zone, Inside Five-Mile were used to disaggregate the Coastal Zone list results from the Five-Mile list.
- **Los Angeles County and Orange County – Coastal Zone:** An STR trend report was not requested for this inventory. Instead, the STR trend reports for Los Angeles County – Coastal Zone and Orange County – Coastal Zone were aggregated by the following process: For both respective inventories, the ADR was multiplied by the number of hotels in the inventory. The resulting totals then summed and divided by the total number of hotels in the two inventories together.
- **Los Angeles County and Orange County – Five-Mile Zone:** An STR trend report was not requested for this inventory. Instead, the STR trend reports for Los Angeles County – Five-Mile Zone and Orange County – Five-Mile Zone were aggregated using the same process described above.

5.1.2.3.2. CCC Formula for In-Lieu Fee Trigger

As discussed in Chapter 3, the CCC's formula to define the low, moderate, and high-cost ranges for hotel inventories relies on two pieces of ADR data: The Statewide ADR and the average ADR for local hotels falling below the Statewide ADR (i.e., the Local Low ADR). To apply the CCC formula to the above hotel inventories, this report will use the Local Low ADRs derived from the process explained below.

Because the STR trend reports do not provide disaggregated results for each hotel in the inventory, the Local Low ADR for each inventory was obtained through a five-step process:

1. Consistent with practices performed by the CCC, the inventories were filtered to show only one or two-diamond AAA-rated hotels.¹³⁷

137. Ibid., 30-31

2. A yearly average was surmised for each hotel by taking the average of the low and high from the rate ranges provided in AAA's 2105 guide for Southern California.¹³⁸
3. Using STR trend report data for each hotel inventory,¹³⁹ the July and August 2014 ADR was divided by the 12-month 2014 ADR to produce a July and August 2014 multiplier.¹⁴⁰ The 2014 figures were used because the complete 12-month 2015 ADR figures are not yet available.¹⁴¹
4. This multiplier was applied to the surmised averages each hotel within the respective inventory to obtain the estimated average July and August 2015 ADR for each hotel.
5. The Local Low ADR was calculated by averaging the estimated average July and August 2015 ADR for each hotel below the Statewide ADR.

With the Statewide ADR and the Local Low ADR, the CCC's formula, detailed in Chapter 3, was applied for each inventory.

5.2. California Statewide ADR

As explained in Chapter 3, the CCC uses the California Statewide ADR as a baseline to compare the affordability of local hotel inventories. Therefore, the Statewide ADR is a foundational element of the CCC's determination of higher cost hotel rates. Also explained in Chapter 3, the CCC produced a July and August 2007 Statewide ADR of \$132.90, which, as a quality control measure, considered only AAA-rated hotels.¹⁴² The CCC explained that the 2007 figure remained valid overtime, because the Statewide ADR experienced little fluctuation from 2007 to 2013 (\$128.92), but it is unclear whether or not the 2013 figure was exclusive to AAA-rated hotels.¹⁴³ A 2015 STR trend report showed the July and August 2015 Statewide ADR to be \$163.99, not exclusive to AAA-rated hotels.

A review of economic and market conditions and ADR trends suggest that 2007 or 2013 figures are no longer relevant standards of hotel affordability. Although the 2015 figure is not exclusive to AAA-rated hotels, this figure is the most appropriate to serve as the Statewide ADR for purposes of an affordability analysis.

138. American Automobile Association, *TourBook Guide: Southern California*, 2015 ed. (Heathrow, FL: AAA Publishing, 2014).

139. Explained above in this chapter, STR trend reports were not produced for Log Beach – Coastal Zone or the combined Los Angeles County and Orange County inventories were not requested. Therefore the multiplier for these inventories was derived California coastal counties inventories.

140. See Appendix E for the data and calculations generating the July and August 2014 multipliers.

141. As of the date of this technical report, STR trend report data was available for January 2009 through September 2015.

142. San Diego Area Office, 6-13-0407 (*McMillin-NTC, LLC*), 30.

143. *Ibid.*, 29-30

5.2.1. Economic and Market Conditions

Historically, real estate markets rise and fall over time across geography and property sectors (retail, industrial, hotel, residential, etc.). The real estate market is understood to be cyclical, meaning it has certain characteristics and events that will repeat over given periods of time.¹⁴⁴ Cycles among property types and locations do not rise and fall in parallel. While the office sector may be strong at one point in time, a different property sector (such as retail, industrial, hotel, residential, etc.) may be weak at that same point in time. Further, turning points in the real estate cycle—transitioning from prosperity, to recession, to depression, to recovery, and back to prosperity—can be caused and accelerated by a series of outside factors such as natural disasters, shifts in national or local economic policy, and changes in demand for investment and consumer goods.¹⁴⁵

Consider the hotel market's response to the Great Recession. The Great Recession occurred in the United States from December 2007 through June 2009.¹⁴⁶ During this period, the national unemployment rate rose from 5.0 percent to 9.5 percent.¹⁴⁷ In February 2009, employers laid off 362,392 workers over 3,059 mass layoff actions.¹⁴⁸ Although the recession technically ended in June 2009, the hotel market's recovery took hold in 2014. Shown in Figure 7 below, while the national gross domestic product ("GDP") reached positive growth in 2010 (2.7 percent) the national ADR did not approach positive growth until 2011 (3.8 percent).¹⁴⁹ ADR grown began to climb again in 2014 (4.5 percent).¹⁵⁰

144. Richard Grover and Christine Grover, "Property Cycles," *Journal of Property Investment & Finance* 31, no. 5 (2013): 502-503.

145. Ibid.: 506.

146. Bureau of Labor Statistics, United States Department of Labor, *BLS Spotlight on Statistics: The Recession of 2007-2009*, February 2012, 1.

147. Ibid., 2.

148. Ibid., 14.

149. PwC, *Hospitality Directions US: Our Updated Lodging Outlook*, (August 2015), 3. (2015 data through August 31.)

150. Ibid.

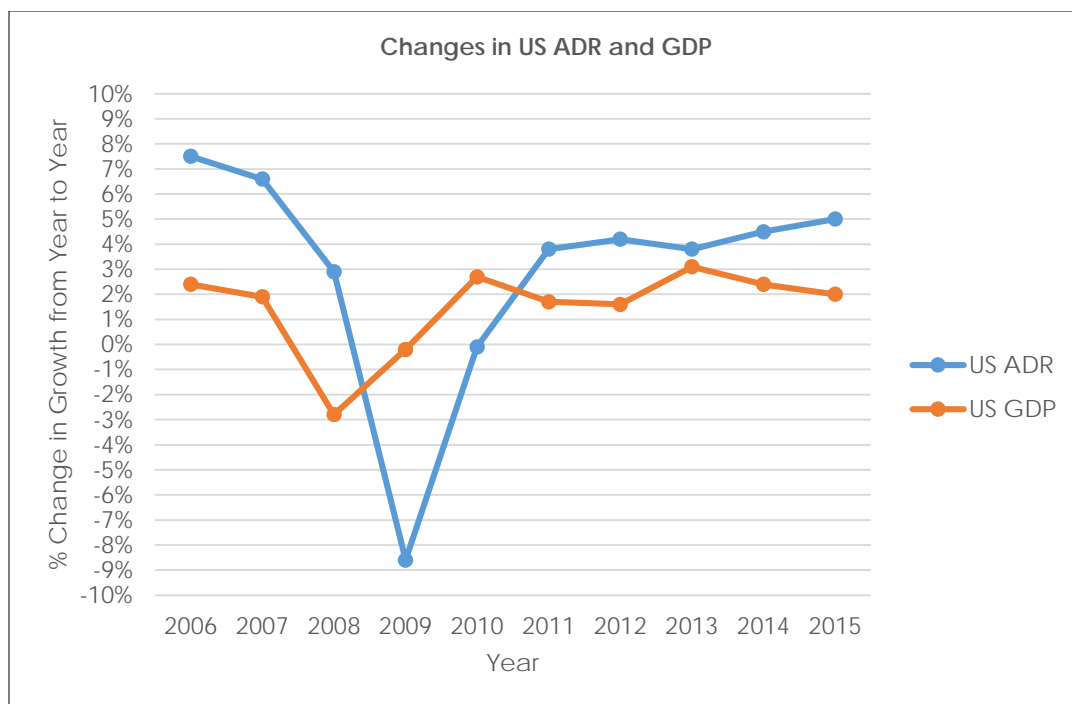


Figure 7. Percentage Changes in Growth in US ADR Compared to GDP (2006 to 2015)
Source: PwC, August 2015, 3. (2015 data through August 31).

The CCC's 2007 and 2013 California July and August ADR figures represent two past market cycles and do not reflect current hotel market trends. Explained further below, the STR trend report's 2015 California July and August ADR figure is more indicative of current conditions.

5.2.2. California ADR Trends

California Statewide ADR trends are consistent with the economic and market conditions described above. Table 6 shows California Statewide July and August ADR figures from 2009 to 2015 (not exclusive to AAA-rated hotels).

Table 6. California Statewide July and August ADR (2009 to 2015)

Year	July and August ADR	% Change by Year	% Change from 2015
2009	\$113.54		44.44%
2010	\$116.71	2.79%	40.51%
2011	\$124.23	6.44%	32.01%
2012	\$132.21	6.42%	24.04%
2013	\$141.27	6.86%	16.08%
2014	\$153.08	8.36%	7.12%
2015	\$163.99	7.12%	

Emerging from the Great Recession, the Statewide July and August ADR increased 2.79 percent from 2009 to 2010 (\$113.54 to \$116.71), but then more than doubled to 6.44 percent from 2010 to 2011 (\$116.71 to \$124.23). July and August ADR growth remained steady in 2011, 2012, and 2013 (6.44 percent, 6.42 percent, and 6.86 percent). In 2014, July and August ADR growth jumped to 8.36 percent. The July and August 2015 ADR (\$163.99) is 16.08 percent greater than in 2013 (\$141.27) and 44.44 percent greater than in 2009 (\$113.54).

Along with the economic and market conditions discussed above, these trends call into question the present-day validity of the CCC's 2007 and 2013 July and August ADR figures. The CCC's 2007 ADR figure (\$132.90) was generated even before the Great Recession, and is likely too distant from the recent ADR trends to properly account for current conditions. The CCC's 2013 ADR figure (\$128.92) was generated before the jump in ADR growth of 2014. Also, the CCC's 2013 ADR figure (\$128.92) is considerably less than the STR produced ADR for the same period (\$141.27).¹⁵¹ For reasons explained below, if the CCC's 2013 ADR figure was exclusive to AAA-rated hotels, then it would likely be greater than the STR's 2013 figure that was not exclusive to AAA-rated hotels.

Aside from being the most up-to-date, the STR trend report's July and August 2015 ADR figure (\$163.99) best captures the impact of the recent changes economic and market conditions on the Statewide ADR.

5.2.3. Exclusivity of AAA-rated Hotels

As explained in Chapter 3, the CCC limits hotel affordability inventories to AAA-rated hotels as a measure of quality control. Although the STR trend report's July and August ADR figure is not exclusive to AAA-rated hotels, it still holds up as an appropriate measure of statewide affordability conditions.

Because AAA-rated hotels must meet particular criteria of quality, rates at AAA-rated hotels are likely higher than rates at non-AAA-rated hotels. Accordingly, and hotel inventory defined by geographic area is assumed to yield a higher ADR if exclusive to AAA-rated hotels than if inclusive of AAA-rated and non-rated-AAA hotels. Following this assumption, the 2015 ADR figure (\$163.99) would likely be higher if exclusive to AAA-rated hotels.

Because the CCC's in-lieu fee formula measures the local inventory ADR against the Statewide ADR to determine affordability and trigger in-lieu fees, using a lower Statewide ADR is a more conservative approach. If the local inventory is exclusive to AAA-rated hotels, the 2015 ADR figure may include the local area's lower cost non-AAA-rated hotels not counted towards the local area's affordability. Accordingly, when applied to the CCC's in-lieu fee formula, the 2015 ADR figure will likely calculate results that understate and not overstate the local area's affordability.

151. The CCC's July and August 2013 ADR figure (\$128.92) is closer to, but still under, the STR trend report's 12-month 2013 ADR figure (\$130.67).

5.3. California Coastal Premium

As mentioned above, a 2006 CCC workshop study on affordable coastal accommodations showed that less than 10 percent of hotels in the state's nine most popular counties were considered low-cost.¹⁵² The data below is intended to further understand and elucidate the affordability issue and the CCC's approach. As would be expected, hotels along the coast are generally more expensive than hotels statewide. However, this difference in cost—the California coastal premium—does not seem to be significant or cost-prohibitive when considering its share of overall travel-related expenditures. Table 8 shows coastal premiums for the Coastal Zone and the Five-Mile Zone.¹⁵³

Table 7. California Coastal Premiums for Coastal Zone and Five-Mile Zone

Political	Distance From Coast	Hotel Count	July and August 2015 ADR		Local Premium
			Coastal	Statewide	
California Coastal Counties	Coastal Zone	228	\$265.04	\$163.99	\$101.04
California Coastal Counties	Five-Mile Zone	471	\$218.73		\$54.74

The premium for hotels in the Coastal Zone is \$101.04 while the premium for hotels in the Five-Mile Zone is \$54.74. Both figures represent the greater market demand for coastal accommodations. Compared to the Statewide ADR, these premiums seem expensive, but become far less significant when compared to the overall travel budget. In 2014, the average per-person cost of a vacation was \$1,145.¹⁵⁴ Based this figure, Table 7 breaks down the components, and their respective shares, of travel-related expenditures.¹⁵⁵

Table 8. Average Household Travel-related by Share (2013) from Total Cost (2014)

Category	Share	Total
Transportation	38.7%	\$443.12
Food/alcohol	26.6%	\$304.57
Lodging	26.0%	\$297.70
Entertainment	8.8%	\$100.76
Total	100.0%	\$1,145.00

Source: Bureau of Labor Statistics, United States Department of Labor, March 2015 (2013 shares); Phillips Erb, July 7, 2015 (2014 total cost). The 2014 total cost was divided by the 2013 shares by category.

152. South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 33.

153. See Appendix D for more detailed data from the STR trend report, including findings from 2009 to 2015 for each inventory.

154. Kelly Phillips Erb, "The Real Cost Of Summer Vacation: Don't Get Buried In Taxes," *Forbes*, July 7, 2014, accessed October 27, 2015, <http://www.forbes.com/sites/kellyphillipserb/2014/07/07/the-real-cost-of-summer-vacation-dont-get-buried-in-taxes/>

155. Ibid.

Because lodging accounts approximately one quarter (26.6%) of the travel-related expenditures, it is unlikely that the California coastal premium would be a regularly prohibitive factor for household trips to the coast. Transportation costs (38.7%) likely play a far greater role in vacation planning. Studies show decisions concerning departure date, travel budget, length of trip, and travel mode are mostly made “before the purchase,” while decisions concerning accommodations are mostly made “at the time purchase” or later.¹⁵⁶

5.4. CCC Local Costs

The STR trend reports for the City of Long Beach, Los Angeles County, and Orange County show that Long Beach offers affordable hotels relative its region and the Statewide ADR. Further the Long Beach – Five-Mile Zone inventory’s July and August 2015 ADR (\$155.05) is \$8.94 below the July and August 2015 Statewide ADR (\$163.99). Further, application of the CCC’s in-lieu fee formula to the inventories exposes problems in the formula’s design.

5.4.1. Local ADR

Relative to its region, the Statewide ADR, and the coastal premiums identified earlier, Long Beach offers reasonably affordable accommodations along the California Coast. In fact, the Long Beach – Five-Mile Zone ADR is lower than the statewide average, suggesting there may be limited to no basis for the CCC to impose in-lieu fee penalties City of Long Beach projects. Tables 10 and 11 shows the ADR findings for local inventories.¹⁵⁷

Table 9. Coastal Zone Local Inventory ADR Findings (2015)

Political	Distance from the Coast	Hotel Count	July and August 2015 ADR		Local Premium (Local – Statewide)
			Local	Statewide	
City of Long Beach	Coastal Zone	5	\$191.54	\$163.99	\$27.55
Los Angeles County	Coastal Zone	27	\$314.29		\$150.29
Orange County	Coastal Zone	26	\$399.16		\$235.17
Los Angeles County and Orange County	Coastal Zone	53	\$355.92		\$191.93

156. Astrid Kemperman and Anna Grigolon, “Facet-based Analysis of Vacation Planning Processes: A Binary Mixed Logit Panel Model,” *Journal of Travel Research* 52, no. 2 (2013): 193.

157. See Appendix D for additional data from the STR trend reports.

Table 10. Five-Mile Zone Local Inventory ADR Findings (2015)

Political	Distance from the Coast	Hotel Count	July and August 2015 ADR		Local Premium (Local – Statewide)
			Local	Statewide	
City of Long Beach	Five-Mile Zone	17	\$155.05	\$163.99	-\$8.94
Los Angeles County	Five-Mile Zone	101	\$197.42		\$33.42
Orange County	Five-Mile Zone	42	\$341.85		\$177.86
Los Angeles County and Orange County	Five-Mile Zone	143	\$239.84		\$77.85

The findings above show that Long Beach offers the most affordable rates (\$191.54 for the Coastal Zone and \$155.05 for the Five-Mile Zone) when compared to Los Angeles County and Orange County. The Five-Mile Zone for Long Beach produced an ADR that is \$8.94 below the Statewide ADR. This is a significant finding, particularly in the context of the California coastal premiums identified in the section above. Tables 12 and 13 below shows the local inventory premiums (Local ADR – Statewide ADR) relative to the statewide Coastal premiums.

Table 11. Coastal Zone Local Premiums Relative to Coastal Zone Premium (2015)

Political	Distance from the Coast	Hotel Count	Local Premium	Coastal Zone Premium	Ratio (Local / Coastal Zone)
City of Long Beach	Coastal Zone	5	\$27.55	\$101.04	0.27
Los Angeles County	Coastal Zone	27	\$150.29		1.49
Orange County	Coastal Zone	26	\$235.17		2.33
Los Angeles County and Orange County	Coastal Zone	53	\$191.93		1.90

Table 12. Five-Mile Zone Local Premiums Relative to Five-Mile Zone Premium (2015)

Political	Distance from the Coast	Hotel Count	Local Premium	Five-Mile Zone Premium	Ratio (Local / Five-Mile Zone)
City of Long Beach	Five-Mile Zone	17	-\$8.94	\$54.74	-0.16
Los Angeles County	Five-Mile Zone	101	\$33.42		0.61
Orange County	Five-Mile Zone	42	\$177.86		3.25
Los Angeles County and Orange County	Five-Mile Zone	143	\$75.85		1.39

The Long Beach's ratio falls well within the coastal premiums for both zones (0.27 for the Coastal Zone and -0.16 for the Five-Mile Zone). Within the Region, Orange County produced the most drastic difference between the local premiums and the coastal premiums (2.33 for the Coastal Zone and 3.25 for the Five-Mile Zone). Long Beach's home county, Los Angeles County's ratio for the Coastal Zone (1.49) is well below Orange County's, and its ratio for the Five-Mile Zone (0.61) is even further below Orange County's.

The above findings are not isolated to 2015. Since 2009, the July and August ADR for Long Beach – Coastal Zone has remained the most affordable of the inventories studied, while Long Beach – Five-Mile Zone has remained below the Statewide ADR. Figures 7 and 8 show the

Coastal Zone and Five-Mile Zone inventories, respectively, compared to the Statewide ADR from 2009 to 2015.

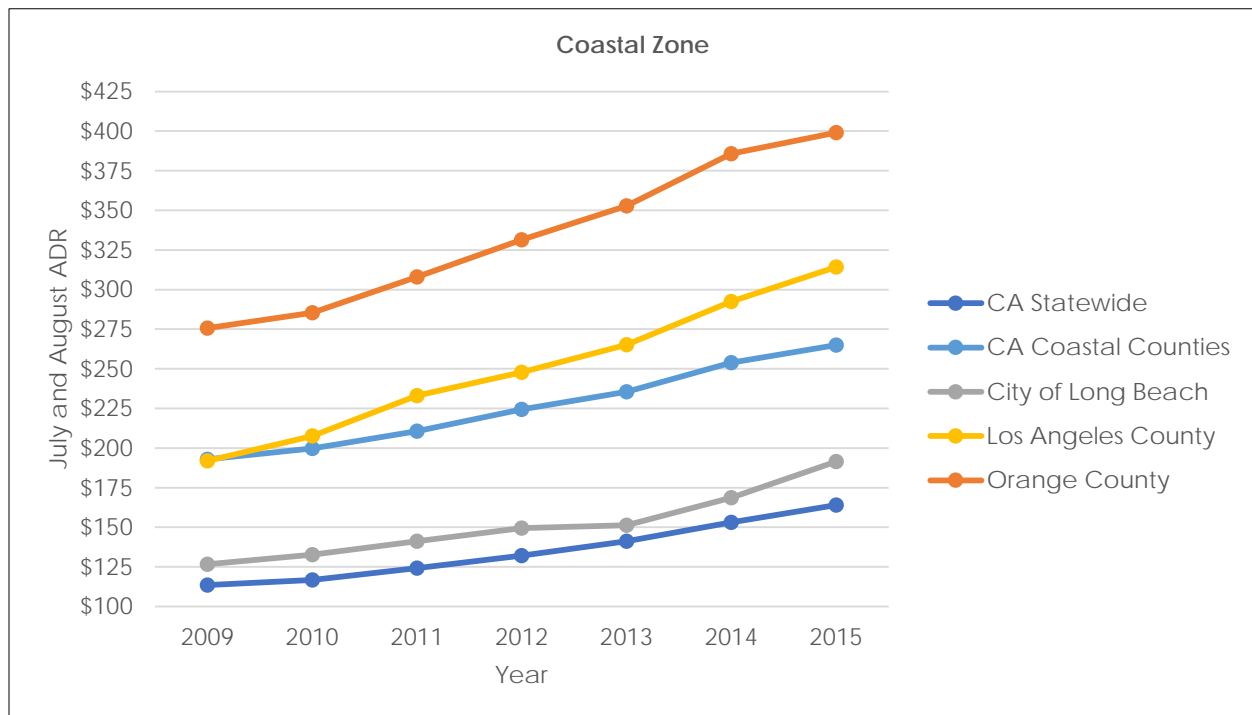


Figure 8. Coastal Zone Inventories Compared to the Statewide ADR (2009 to 2015)

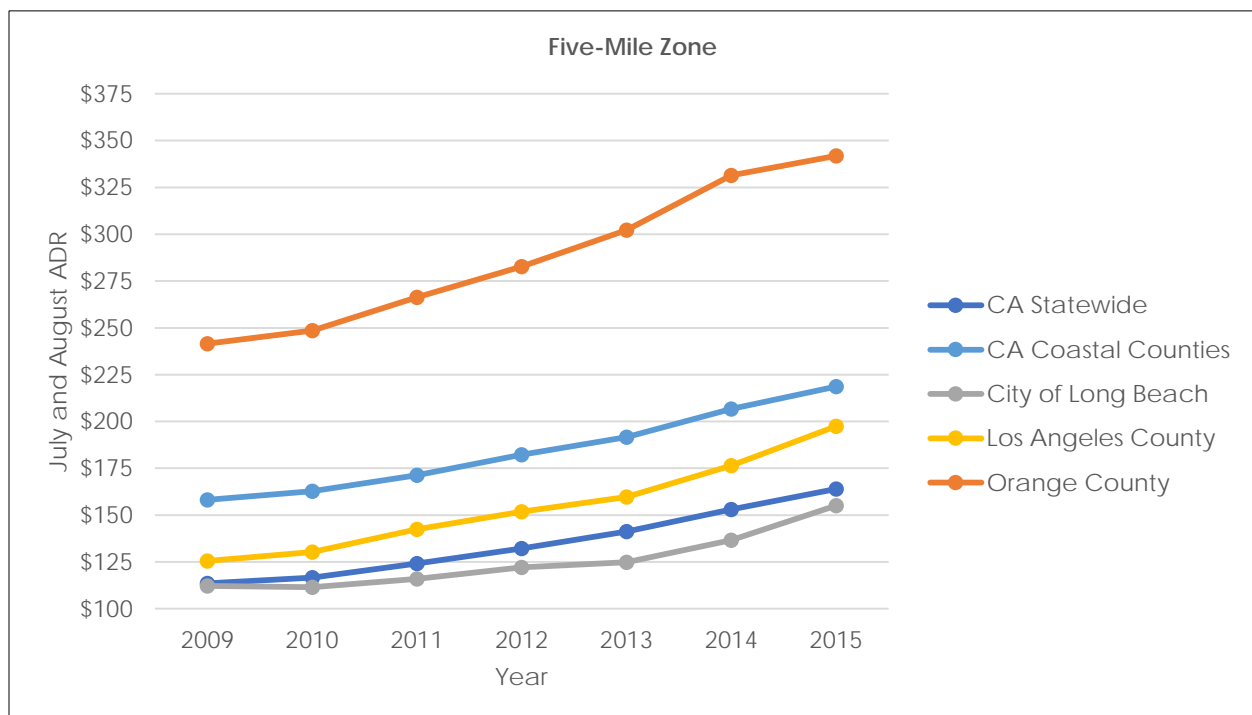


Figure 9. Five-Mile Zone Inventories Compared to the Statewide ADR (2009 to 2015)

5.4.2. CCC In-Lieu Fee Triggers

Even though Long Beach's hotel inventory in the Five-Mile Zone is shown to be relatively affordable above (\$8.94 less than the Statewide ADR), the CCC's formula will still trigger an in-lieu fee for this inventory. Further, application of the CCC's in-lieu fee formula fails unless the inventory includes a sufficient number of hotels with ADRs below the statewide average.

Table 14 shows, where applicable, the High Cost Point at which an in-lieu fee would be triggered for each inventory:¹⁵⁸

Table 13. In-lieu Fee Triggers for Local Hotel Inventories

Political	Distance From Coast	2-Diamond Hotel Count		Local Low ADR	Local ADR Quotient (Local Low / Statewide)	Local High Cost Range (In-Lieu Fee Trigger)
		Total	Below Statewide ADR (\$163.99)			
City of Long Beach	Coastal Zone	1	0	NA	NA	NA
	Five-Mile Zone	5	1	\$111.76	0.68	> \$216.23
Los Angeles County	Coastal Zone	3	1	\$146.75	0.89	> \$181.23
	Five-Mile Zone	21	9	\$136.84	0.83	> \$191.14
Orange County	Coastal Zone	4	1	\$118.95	0.73	> \$209.04
	Five-Mile Zone	10	1	\$120.40	0.73	> \$207.58
Los Angeles County and Orange County	Coastal Zone	7	2	\$155.26	0.95	> \$172.73
	Five-Mile Zone	31	14	\$138.96	0.85	> \$189.02

The results above highlight a key shortcoming of the CCC formula: Because the CCC formula is based on the hotels with ADRs below the statewide average, the overall affordability of the area is not captured. For example, Long Beach – Five-Mile Zone has an overall ADR of \$155.05 (\$8.94 below the Statewide ADR) and Orange County – Five-Mile Zone has an overall ADR of \$341.85 (\$75.85 above the Statewide ADR). However, the in-lieu fee triggers for the two inventories are very close (above \$216.23 for Long Beach – Five-Mile Zone and above \$207.58 for Orange County – Five-Mile Zone). The Long Beach – Five-Mile Zone represents far greater affordability than the Orange County – Five-Mile Zone, but the formula does not consider this vast difference in triggering the in-lieu fee.

158. See Appendix E for the hotel data and calculations used to produce the Local Low ADR for each inventory.

Chapter 6. Legal Review of In-Lieu Fees

The LCOVA in-lieu fee constitutes a monetary exaction, for which California Courts apply differing standards of review depending on whether the fee is an ad hoc fee or a legislatively imposed fee. This chapter discusses the local authority to require exactions as permit conditions and the Federal and California laws limiting that authority. (The legal analysis presented in this report does not constitute legal advice and is reserved for review by the city attorney.)

6.1. Land Use Regulation Authority

The United States Supreme Court has held that the state and local authority to regulate land use arises from the police power—capacity to regulate for health, safety, and welfare.¹⁵⁹ The Tenth Amendment of the United States Constitution reserves for the states all powers not constitutionally delegated to the federal government; such authority reserved for states includes the police power.¹⁶⁰ The California Constitution further extends the police power, including land use regulation, to its counties and cities.¹⁶¹

6.2. Monetary Exactions

Exactions are a form of land use regulation where the government requires a developer provide either property (property exaction, e.g., deeding an easement) or payment (monetary exaction, e.g., paying in-lieu fees) as a condition for approval of a permit for the proposed development. The purpose of the exaction is to offset identified potential public harms or costs associated with the proposed development. Here, the CCC requires the developer to provide LCOVA facilities (property exaction) or pay an in-lieu fee to fund construction of LCOVA elsewhere (monetary exaction). The CCC's LCOVA in-lieu fee is at issue here.

6.3. Ad Hoc Fees vs. Legislatively Imposed Fees

As mentioned above, the CCC generally requires the in-lieu fee in two cases—one concerning an ad hoc fee and one concerning a legislatively imposed fee.

159. See *Village of Euclid v. Ambler Realty Co.*, 272 U.S. 365, 388 (1926).

160. U.S. Const. amend. X. "The powers not delegated to the United States by the Constitution, nor prohibited by it to the States, are reserved to the States respectively, or to the people" (ibid.).

161. See *Village of Euclid*, 272 U.S. at 390-91.

6.3.1. Ad Hoc Fee

First, when a developer applies to the CCC for approval of a development permit, the CCC will impose these conditions ad hoc if it finds that a proposed development would occupy land for which LCOVA would be the preferred use.¹⁶² In this case, the CCC is requiring an ad hoc fee – a mitigation fee determined at agency discretion on a case-by-case basis.

6.3.2. Legislatively Imposed Fee

Second, when a city applies to the CCC for approval of a LCP or policy under the Commission’s jurisdiction, the CCC will condition approval on the city adopting the LCOVA in-lieu fee. In this case the city is required to implement a legislatively imposed fee – a mitigation fee codified by statute, typically applied formulaically, leaving no room for agency discretion.

6.4. Legal Standards

The United States Supreme Court announced the constitutional rules governing property exactions in *Nollan v. California Coastal Commission* (the essential nexus requirement)¹⁶³ and *Dolan v. City of Tigard* (the rough proportionality requirement).¹⁶⁴ In *Koontz v. St. Johns River Water Management District*, the Court clarified that the same rules also apply to monetary exactions,¹⁶⁵ but left unclear whether the rules apply equally to ad hoc and legislatively-imposed fees.¹⁶⁶ However, the California Supreme Court, considering *Nollan*, *Dolan*, and the state’s Mitigation Fee Act,¹⁶⁷ has articulated differing legal standards for ad hoc fees versus legislatively imposed fees in cases of monetary exactions.¹⁶⁸ California Courts apply the *Nollan* and *Dolan*’s essential nexus and rough proportionality requirements to ad hoc fees and the Mitigation Fee Act’s reasonable relationship requirement to legislatively imposed fees.¹⁶⁹

162. See Cal. Pub. Res. Code § 30222. “The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry” (ibid.).

163. *Nollan v. Cal. Coastal Comm’n*, 483 U.S. 825, 837 (1987).

164. *Dolan v. City of Tigard*, 512 U.S. 374, 391 (1994).

165. *Koontz v. St. Johns River Water Mgmt. Dist.*, 570 U.S. ___, 133 S. Ct. 2586, 2603 (2013).

166. Ibid. at 2608 (Kagan, J., dissenting).

167. The Mitigation Fee Act is codified in Cal. Gov’t Code §§ 6600, et seq.

168. See *San Remo Hotel v. City and County of San Francisco*, 27 Cal. 4th 643, 670-671 (2002).

169. Ibid.

6.4.1. Federal Law

As discussed below, the federal constitutional requirements concerning exactions — essential nexus and rough proportionality — are grounded in principals of the unconstitutional conditions doctrine and the Fifth Amendment Takings Clause.¹⁷⁰

6.4.1.1. Unconstitutional Conditions Doctrine and the Fifth Amendment Takings Clause

The United States Supreme Court reviews exactions under legal principals of the unconstitutional conditions doctrine and the Fifth Amendment Takings Clause. Under the unconstitutional conditions doctrine, the government may not condition a benefit upon waving a constitutional right.¹⁷¹ Under the Fifth Amendment Takings Clause, the government may not take private property, unless for public use and with just compensation (expressed in terms of market value of the loss).¹⁷² In exaction cases, the Court considers whether the exaction (property or monetary) required for permit approval is an unconstitutional condition in that it unduly burdens the applicant's rights to just compensation under the Fifth Amendment Takings Clause.¹⁷³

6.4.1.2. Essential Nexus and Rough Proportionality

For a property or monetary exaction to be a valid land use regulation and not a taking, the United States Supreme Court requires it meets the essential nexus and rough proportionality tests of *Nollan* and *Dolan*, respectively.¹⁷⁴ The essential nexus test is satisfied if the permit condition (the exaction) serves the same purpose and the objective of the condition (offsetting the potential public harms or costs of the proposed development).¹⁷⁵ The rough proportionality test is satisfied if the exaction is roughly proportional to potential public harms or costs of the proposed development.¹⁷⁶

Further, the Court in *Koontz* held that the *Nollan* and *Dolan* decisions apply to exactions (property or monetary) whether or not the permit was eventually approved or denied by the government.¹⁷⁷ The government must offer the applicant at least one constitutional alternative

170. Beyond the unconstitutional conditions doctrine and the Fifth Amendment Takings Clause, the Fourteenth Amendment Equal Protection Clause (No state shall “deny to any person within its jurisdiction the equal protection of the laws” (U.S. Const. Amend. XIV, § 1.)), may be relevant to legal review of the LCOVA in-lieu fee. A developer could potentially argue that the CCC has biasedly handpicked the cases to which it applied the LCOVA in-lieu fee. In response, the CCC may argue that such is the nature of the imposition of ad hoc fees.

171. *Koontz*, 133 S. Ct. at 2593.

172. *Ibid.*

173. *Ibid.*

174. *Ibid.* at 2603.

175. *Nollan*, 483 U.S. at 837.

176. *Dolan*, 512 U.S. at 391.

177. *Koontz*, 133 S. Ct. at 2603.

for approval. However, as noted in Justice Kagan's dissent, Justice Alito's majority opinion in *Koontz* is unclear as to whether the *Nollan* and *Dolan* decisions apply to ad hoc fees (the type of fee at issue in *Koontz*) as well as legislatively imposed fees.¹⁷⁸

6.4.2. California Law

In addition to the *Nollan* and *Dolan* decisions, California Courts cite the state's Mitigation Fee Act as a governing statute in monetary exaction cases.

6.4.2.1. Reasonable Relationship

The Mitigation Fee Act requires the local agency imposing the fee, whether ad hoc or legislative, to show that there exists a reasonable relationship between the intended use of the fee and the impact of the proposed development and a reasonable relationship between the amount of the fee and the impact of the proposed development.¹⁷⁹ As shown below, California Courts consider the reasonable relationship test less stringent than the essential nexus and rough proportionality tests.

6.4.2.2. Standards for Ad Hoc Fees vs. Legislatively Imposed Fees

The California Supreme Court first required that monetary exactions satisfy the essential nexus and rough proportionality requirements in *Ehrlich v. City of Culver City*.¹⁸⁰ In that case and those subsequent, the Court articulated delineation in standard of review for ad hoc fees versus legislatively imposed fees.¹⁸¹ The Court explained that legislatively imposed fees must only meet the reasonable relationship test under the Mitigation Fee Act, while ad hoc fees must meet the heightened scrutiny of the essential and rough proportionality tests.

178. Ibid. at 2608 (Kagan, J., dissenting). "Perhaps the Court means in the future to curb the intrusion into local affairs that its holding will accomplish; the Court claims, after all, that its opinion is intended to have only limited impact on localities' land-use authority. The majority might, for example, approve the rule, adopted in several States, that *Nollan* and *Dolan* apply only to permitting fees that are imposed ad hoc, and not to fees that are generally applicable. See, e.g., *Ehrlich v. Culver City*, 12 Cal. 4th 854, 911 P. 2d 429 (1996). *Dolan* itself suggested that limitation by underscoring that there 'the city made an adjudicative decision to condition petitioner's application for a building permit on an individual parcel,' instead of imposing an 'essentially legislative determination[] classifying entire areas of the city.' 512 U. S., at 385. Maybe today's majority accepts that distinction; or then again, maybe not. At the least, the majority's refusal 'to say more' about the scope of its new rule now casts a cloud on every decision by every local government to require a person seeking a permit to pay or spend money" (some citations omitted) (ibid.).

179. Cal. Gov't Code, § 6601; See *San Remo Hotel*, 27 Cal. 4th at 671.

180. *Ehrlich v. City of Culver City*, 12 Cal. 4th 854, 881 (1996).

181. Explained above in this chapter, an ad hoc fee is determined at agency discretion on a case-by-case basis, while a legislatively imposed fee is codified by statute leaving, typically applied formulaically, leaving no room for agency discretion.

In *San Remo Hotel v. City and County of San Francisco*, the Court explained its distinction in standards of review was based on a comparative degree of political checks:

While legislatively mandated fees do present some danger of improper leveraging, such generally applicable legislation is subject to the ordinary restraints of the democratic political process. A city council that charged extortionate fees for all property development, unjustifiable by mitigation needs, would likely face widespread and well-financed opposition at the next election. Ad hoc individual monetary exactions deserve special judicial scrutiny mainly because, affecting fewer citizens and evading systematic assessment, they are more likely to escape such political controls.¹⁸²

6.5. Taking or a Special Tax

Should a monetary exaction be successfully challenged, it may be found to be either a taking or special tax under California law.

6.5.1. Taking

A monetary exaction that does not pass its applicable legal standards may be considered a taking under the Fifth Amendment, which would require just compensation be paid for the loss.¹⁸³

6.5.2. Special Tax

Further, a fee that fails the reasonable relationship test when applicable may be considered a special tax—a tax levied for a specific purpose—and would then be subject to a public vote. Under California Constitution, special taxes are prohibited unless approved by a two-thirds vote in the jurisdiction.¹⁸⁴ The Mitigation Fee Act sets special procedures for challenging a fee as a special tax.¹⁸⁵ Should the challenger meet the procedural requirements set forth in the Mitigation Act, the burden placed on the government to demonstrate:

(1) [T]he estimated costs of the service or regulatory activity, and (2) the basis for determining the manner in which the costs are apportioned, so that the charges allocated to a payor bear a fair or reasonable relationship to the payor's burdens on or benefits from the regulatory activity.¹⁸⁶

182. *San Remo Hotel*, 27 Cal 4th at 671.

183. *Koontz*, 133 S. Ct. at 2599.

184. Cal. Const. art. XIII A, § 4. “Cities, Counties and special districts, by a two-thirds vote of the qualified electors of such district, may impose special taxes on such district, except ad valorem taxes on real property or a transaction tax or sales tax on the sale of real property within such City, County or special district” (ibid.).

185. Cal. Gov’t Code § 66020.

186. *San Diego Gas & Elec. Co. v. San Diego County Air Pollution Control Dist.*, 203 Cal.App.3d 1132, 1146.

However, the California Supreme Court held that “[s]imply because a fee exceeds the reasonable cost of providing the service or regulatory activity for which it is charged does not transform it into a tax,” noting that a tax is used for unrelated purposes from which the charge generates.¹⁸⁷

187. *Barratt Am., Inc. v. City of Rancho Cucamonga*, 37 Cal. 4th 685, 700 (2005).

Chapter 7. Legality of the \$30,000/25% Fee

As explained in Chapters 2, 3, and 4, the CCC required the LCOVA in-lieu fee upon case-by-case permit review (as an ad hoc fee) and upon review of jurisdictions' LCPs or related policy (as a legislatively imposed fee to be adopted by the jurisdiction). Chapter 5 provides hotel rate data as a quantitative context Chapter 6 sets forth the standards for legal review for both instances. As shown in this chapter, the \$30,000/25% fee likely fails the applicable legal tests when required as an ad hoc fee or a legislatively imposed fee, particularly when applied within Long Beach. (The legal analysis presented in this report does not constitute legal advice and is reserved for review by the city attorney.)

7.1. As an Ad Hoc Fee

The CCC applies the LCOVA in-lieu fee as an ad hoc fee when it imposes the fee on a case-by-case basis as a condition to approval of a CDP. A coastal jurisdiction with a certified LCP, like Long Beach, could also choose to impose the LCOVA in-lieu fee as a condition for approval for a CDP. Under Federal and California Law, ad hoc fees must meet the essential nexus and rough proportionality requirements of *Nollan* and *Dolan*.¹⁸⁸ As generally applied in case-by-case permit review by the CCC or a local coastal jurisdiction, the LCOVA in-lieu fee most likely passes the essential nexus test, but likely fails the rough proportionality test.

7.1.1. Essential Nexus

In *Nollan*, the United States Supreme Court held that an essential nexus must exist between permit condition and the objective of the permit condition—a legitimate state interest.¹⁸⁹ The Court explained,

In short, unless the permit condition serves the same governmental purpose as the development ban, the building restriction is not a valid regulation of land use, but “an out-and-out plan of extortion.”¹⁹⁰

To satisfy *Nollan*'s nexus requirement, the CCC's objective to mitigate exclusion of LCOVA facilities along the coast must be a legitimate state interest, and the LCOVA in-lieu fees must serve this objective. The LCOVA in-lieu fees most likely pass the essential nexus test.

188. Ibid. at 670.

189. *Nollan*, 483 U.S. at 837.

190. Ibid.

7.1.1.1. Legitimate State Interest

Under *Nollan*, the objective of the permit condition must be a “legitimate state interest.”¹⁹¹ The United States Supreme Court has upheld a broad range of land use objectives as constituting a legitimate state interest, including scenic zoning, landmark preservation, and residential zoning.¹⁹² Because the objective is derived from State legislation establishing land use priorities along the coast, the CCC’s objective in this matter is most likely a legitimate state interest.

Across staff reports, the CCC points to two sections of the Coastal Act validating LCOVA mitigation policy – 30213¹⁹³ and 30222.¹⁹⁴ First, the CCC cites Section 30213 of the Public Resources Code, which charges the Commission to protect, encourage, and, where feasible, provide for lower cost visitor and recreational facilities along the State’s coast.¹⁹⁵ Second, the CCC cites Section 30222 of the Public Resources Code, which prioritizes development of visitor-serving uses along the coast over private residential, general industrial, or general commercial uses.¹⁹⁶

Given its support in state statute, and that the Supreme Court has found scenic zoning and landmark preservation to be legitimate state interests, the CCC’s objective to encourage and provide for LCOVA facilities is most likely a legitimate state interest.

7.1.1.2. The Nexus

Under *Nollan*’s essential nexus test, the permit condition and the objective of the permit condition must serve the same legitimate government interest.¹⁹⁷ For an essential nexus to exist for the LCOVA in-lieu fee, the fee must serve the objective of the fee – to mitigate preclusion of LCOVA facilities along the coast. Given the prescribed use of the fee, the LCOVA in-lieu fees most likely meets essential nexus requirement.

191. Ibid.

192. Ibid. at 834-835.

193. Cal. Pub. Res. Code § 30213.

194. Ibid. § 30222.

195. San Diego Area Office, 6-13-0407 (*McMillin-NTC, LLC*), 27.

196. California Coastal Commission, South Central Coast Area Office, *Agenda Item 15b, Thursday, July 10, 2014, City of San Buenaventura Local Coastal Program Amendment No. SBV-MAJ-2-12, Th15b-7-2014*, (Ventura, CA, 2014), 5-6. This CCC staff report concerned an amendment City of Ventura LCP to allow mixed-use residential parcels to be built on parcels formally zoned to allow overnight visitor accommodations. The CCC staff considered this amendment a preclusion of LCOVA facilities and required that the City charge the developer a \$1.8 million fee to provide for LCOVA accommodations. In a letter to the CCC dated July 3, 2014, the Pacific Legal Foundation questioned whether the amendment lawfully triggered an in-lieu fee given the ruling in *Koontz* that such fees must meet the essential nexus and rough proportionality requirements. In the staff report, the CCC responded to the essential nexus issue explaining that Section 30222 establishes a state interest in the CCC interest in preventing the preclusion of LCOVA facilities. The staff report, however, did not seem to respond to the rough proportionality issue.

197. *Nollan*, 483 U.S. at 837.

Here, a proposed development's impact, as identified by the CCC, is the preclusion of LCOVA facilities on site. Explained by CCC staff,

The expectation of the Commission, based upon several precedents, is that developers of sites suitable for overnight accommodations will provide facilities which serve people with a range of incomes. If development cannot provide for a range of affordability on-site, the Commission requires off-site mitigation.¹⁹⁸

When imposed by CCC, LCOVA in-lieu fees are expressly collected for the “the acquisition, construction or renovation of lower cost accommodations along the California Coast.”¹⁹⁹ In a 2010 accounting by the CCC, of the \$19.2 million in LCOVA in-lieu fees available (\$16.7 million in fees collected since 1979 earning \$2.5 million in interest), the CCC spent \$8.6 million toward LCOVA preclusion mitigation (e.g., funding new campgrounds, RV sites, or hostels)..²⁰⁰ These facilities include, among other projects construction of a 260-bed hostile in Santa Monica, a 100-bed hostile in Santa Barbara, and rehabilitation of the Crystal Cove Cottages.²⁰¹

In general, the intended and actual use of the LCOVA in-lieu fees serve the same legitimate government interest as the objective of the fee—to mitigate preclusion of LCOVA facilities along the coast—thus meeting the essential nexus requirement.²⁰²

7.1.2. Rough Proportionality

In *Dolan*, the United States Supreme Court held that a permit condition must be roughly proportional to the potential harm of the proposed development.²⁰³ The Court explained,

No precise mathematical calculation is required, but the city must make some sort of individualized determination that the required dedication is related both in nature and extent to the impact of the proposed development.²⁰⁴

198. San Diego Area Office, 6-13-0407 (*McMillin-NTC, LLC*), 27-28.

199. California Coastal Commission, *Status Report on In-Lieu Fee Mitigation for Impacts to Lower-Cost Overnight Accommodations*, by Peter M. Douglas, Susan Hanscj, Charles Lester, Elizabeth A. Fuchs, Nicholas Dreher, F14c-5-2010, (San Francisco, CA, 2010), 1.

200. Ibid.

201. Ibid., 6-12.

202. The issue here is not whether or not the fee is effective in its service of the legitimate state interest. In *Lingle v. Chevron U. S. A. Inc.*, 544 U.S. 528 (2005), the United States Supreme Court held that the “substantially advance[s] a legitimate state interest” test is not appropriate for cases under Fifth Amendment Takings Clause. In her majority opinion, Justice O'Connor explained that the “substantially advances” test is a question of whether the regulation was effective, and does not explain whether the regulation was a taking—a question of the “magnitude or character of the burden a particular regulation imposes upon private property rights” (ibid. at 542).

203. *Dolan*, 512 U.S. at 391.

204. Ibid.

California Courts have emphasized the decision's use of the terms "individualized determination" and "nature and extent to the impact."²⁰⁵ For the LCOVA in-lieu fee to satisfy *Dolan's* rough proportionality requirement, the CCC must make an individualized determination that the fee is roughly proportional to the nature and extent of the proposed development's impact. The LCOVA in-lieu fee likely fails this test.

7.1.2.1. Nature and Extent of Impact

To determine whether the LCOVA in-lieu fee is roughly proportional in nature and extent to offending development impacts, the nature and extent of the impact must first be identified. As mentioned above, the CCC's position is not that a development necessarily creates a need for LCOVA facilities, but that it precludes the provision of LCOVA facilities on that site. However, the significance of the impact of the preclusion likely varies based on location.

7.1.2.1.1. LCOVA Preclusion

The following three examples illustrate the CCC's classification of the impact.

- A non-hotel development, such as a residential subdivision, on land suitable for LCOVA facilities would likely comprise a total preclusion of LCOVA facilities.²⁰⁶
- A hotel development where all room rates are in the higher price range may also comprise a total preclusion of LCOVA facilities.
- A hotel development includes a mix of LCOVA and higher prices facilities may be considered less than a total preclusion of LCOVA facilities.²⁰⁷

This position considers nature and extent of the impact of LCOVA preclusion in absolute terms, which is compatible with the context of a state-wide deficiency of LCOVA supply presented by CCC staff reports; if the LCOVA facility inventory for the California Coastal Zone at-large is lacking, then all lost opportunities to construct new facilities could be counted as virtually equal impacts. However, a California precedent likely requires that the impact be defined in a narrower scope.

205. *Ocean Harbor House Homeowners Ass'n v. Cal. Coastal Comm'n*, 163 Cal.App.4th 215, 229 (2008).

206. *City of San Buenaventura No. City of San Buenaventura*, 5. This CCC staff report concerned an amendment City of Ventura LCP to allow mixed-use residential parcels to be built on parcels formally zoned to allow overnight visitor accommodations. The CCC staff considered this amendment a preclusion of LCOVA facilities and required that the City charge the developer a \$1.8 million fee to provide for LCOVA accommodations.

207. San Diego Area Office, 6-13-0407 (*McMillin-NTC, LLC*), 33-34. As discussed in Chapter 4, in the 2200 Lee Court project, the CCC imposed a \$30,000/12.5% fee given the development's proposed free amenities and accommodation of rooms for more guests.

7.1.2.1.2. Impacts in the Local Context

In *California Building Industry Association v. City of San Jose*,²⁰⁸ the California Court of Appeal for the Sixth District related the holding in *Shapell Industries, Inc. v. Governing Board*,²⁰⁹

In *Shapell* the very purpose of the school facilities fee was to accommodate a growing student population and reduce overcrowding of schools *caused by* new development. The fee was improper to the extent that the assessment was based on an estimated increase in student population overall rather than on the increase generated by the new housing itself. We declined to second-guess the district's methods of deriving its supporting data, but we insisted that a “reasoned analysis” be conducted “to establish the requisite connection between the amount of the fee imposed and the burden created” by the development. (Citation omitted). The district was required only to “make a reasonable choice after considering the relevant factors.” (Citation omitted). Thus, it had to “demonstrate that development contributes to the need for the facilities, and that its choices as to what will adequately accommodate the influx of students are *reasonably based*.” (Citation omitted).²¹⁰

In *Shapell*, the Court found that a fee charged to a specific development must be based on that development’s impact, not a wider trend indicating a need for additional public facilities. As discussed above, the CCC defines the impact of developments charged the LCOVA in-lieu fee as preclusion of LCOVA facilities along the California coast—an impact tied to the statewide trend. However, the nature and extent of the impact of LCOVA preclusion likely varies depending on the location of the development.

Consider Long Beach’s relative affordability in coastal overnight accommodations compared to that of Orange County elucidated in Chapter 5. A lost opportunity to build a LCOVA facility would be less significant an impact in Long Beach, which maintains a relatively lower or moderately-priced cost hotel stock, than in Orange County, which has a relatively higher-priced hotel stock.

Accordingly, a more accurate identification of the extent and nature of the impact would include the degree of LCOVA preclusion in context of the local conditions.

7.1.2.2. Individualized Determination of Rough Proportionality

Under *Dolan*, The United States Supreme Court requires that the agency make an individual determination, with some effort to quantify its findings, that the fee is roughly proportional to the impact of the development.²¹¹ As mentioned above, the CCC applies a

208. *Cal. Building Industry Ass’n v. City of San Jose*, 216 Cal.App.4th 1373 (2013).

209. *Shapell Industries, Inc. v. Governing Board*, 1 Cal.App.4th 218 (1991).

210. *Cal. Building Industry Ass’n*, 216 Cal.App.4th at 1386. The Court explained that the test applied in *Shapell* “was drawn from *California Hotel & Motel Assn v. Industrial Welfare Com.* (1979) 25 Cal.3d 200, 212 [157 Cal.Rptr. 840, 599 P.2d 31]: ‘A court will uphold the agency action unless the action is arbitrary, capricious, or lacking in evidentiary support. A court must ensure that an agency has adequately considered all relevant factors, and has demonstrated a rational connection between those factors, the choice made, and the purposes of the enabling statute’” (ibid. at 1385).

211. *Dolan*, 512 U.S. at 391.

formula to define the higher cost range—the room rates at which the LCOVA in-lieu fee is triggered for a development project. Typically, the CCC imposes the \$30,000/25% fee for a proposed development’s rooms in the higher cost range. This method cannot individually determine a LCOVA in-lieu fee roughly proportional to the nature and extent of impacts of proposed development for three reasons:

1. It will virtually always generate an in-lieu fee for nearly any proposed hotel development;
2. It fails to adequately account for local conditions, such as existing LCOVA facilities and other accommodations; and
3. The in-lieu fee it imposes is not supported by substantial evidence.²¹²

7.1.2.2.1. Regular Generation of an In-Lieu Fee

First, the CCC’s formula cannot individually determine a fee roughly proportional to the development’s impact because the formula virtually always generates a fee. As explained above, the formula calculates an in-lieu fee by identifying the Local High Cost Range, based on a difference between the Local Low ADR (the average ADR for hotels below the Statewide ADR) and Statewide ADR. So long as the local hotel inventory includes at least one hotel with an ADR below the Statewide average, the formula will produce an in-lieu fee. A local hotel inventory that includes no hotels below the Statewide ADR will confound the formula and fail to generate an in-lieu fee. Further, as discussed below, the Local Low ADR does not adequately measure the affordability of the local hotel inventory.

7.1.2.2.2. Local Conditions

Second, the CCC’s formula does not adequately account for local conditions concerning overnight accommodations affordability, and therefore cannot produce an in-lieu fee roughly proportional to the development’s impacts, for three reasons:

1. The Local ADR does not represent the overall affordability of the inventory,
2. Facilities defined by the CCC as inherently LCOVA are not included, and
3. Local lower-cost hotels included in the Statewide ADR are not included in the local hotel inventory for purposes of the formula.

212. *Cal. Building Industry Ass’n*, 216 Cal.App.4th at 1386.

7.1.2.2.2.1. Local Low ADR

The Local Low ADR does not represent the overall affordability of the local hotel inventory. Consider the following illustration of hypothetical City A and City B with an assumed Statewide ADR of \$130:

Table 14. Hypothetical Hotel Inventories for City A and City B

Hotel	1	2	3	4	5	6	7	8	9	10
City A	\$125	\$125	\$125	\$125	\$125	\$125	\$125	\$125	\$130	\$150
City B	\$90	\$110	\$130	\$130	\$150	\$150	\$175	\$175	\$200	\$200

Amounts in red fall below assumed statewide ADR of \$130.

Table 15. Hypothetical ADR Figures for City A and City B

Hotel	Local ADR	Local Low ADR	Statewide ADR	Local High Cost Range
City A	\$128	\$125	\$130	\$135
City B	\$151	\$100		\$160

As shown in Tables 12 and 13, eight of ten hotels in City A are below the Statewide ADR, while only two of ten hotels in City B are below the Statewide ADR. Further, City A's overall ADR (\$128) is \$2 below the Statewide ADR (\$130), while City B's overall ADR (\$151) is \$31 above. Indecently, the Local Low ADR for City A (\$125) is higher than for City B (\$100). However, these figures that demonstrate relative affordability are not factored into the Local Low ADR. Considering the Statewide ADR, the Local High Cost Range for City A is \$135 and for City B is \$160. This means that a hotel built in City A will pay the \$30,000/25% fee for rooms over \$135, which is a harsher penalty than would be exacted on City B.

Because the formula may produce a harsher penalty for a City with greater hotel affordability than another, the LCOVA in-lieu fee is likely not applied in a manner roughly proportional.

7.1.2.2.2.2. "Inherently Lower Cost" Inventory

When compiling the local hotel inventory, the CCC draws from AAA-rated properties, which excludes facilities the CCC considers as "inherently lower cost," such as hostiles, campsites, and potentially RV parks.²¹³ Therefore, these facilities may not contribute to a Local Low ADR. Because the formula fails to account for the local stock of inherently LCOVA facilities, the formula is again producing an in-lieu fee absent consideration the full picture of local affordability.

213. South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 33.

7.1.2.2.2.3. AAA-rated Properties

Further, the CCC compiles local hotel inventories from a different subset of hotels in California than is used for the statewide average. As discussed in Chapter 3, the CCC only considers AAA-rated properties when surveying hotels within the defined relevant local area to identify the Local Low ADR to ensure only quality hotels are counted. However, the Smith Travel Research (“STR”) trend reports, from which the CCC obtains the Statewide ADR figure, likely include rates of many hotels that are not AAA-rated. Hotels that are not AAA-rated may be lower cost than those that are. Accordingly, a local area’s lower cost non-AAA-rated hotels counted in the Statewide ADR may not be counted towards the local area’s affordability.

The CCC’s different application of AAA ratings in inventories presents two problems with assessments of hotel affordability in the state and local areas. The first problem is the possible deflation of the Statewide ADR and inflation of the local area ADR, which in turn impacts the CCC’s imposition of the in-lieu fee. The second problem is a negation of a quality control measure enacted by the CCC in local hotel inventories, since the CCC applies this measure to the local inventory, but not the statewide. These two problems further hinder the formula’s capacity to produce a fee that is roughly proportional.

7.1.2.2.3. Source of the \$30,000 Base Fee

Third, the \$30,000/25% fee was likely derived from a source with conflicting interests and therefore likely not based on substantial evidence. As discussed in Chapter 3, the CCC, in 2006, determined the \$30,000 base fee for the LCOVA in-lieu fee based on information provided by Hostelling International (“HI”) – a nonprofit global membership organization of youth hostels.²¹⁴ However, the CCC has in some cases named HI as an option a jurisdiction may select to manage the LCOVA in-lieu fee account.²¹⁵ However, Hostelling International and its affiliate organization, American Youth Hostels (“AYH”) (also known as Hostelling International USA),²¹⁶ have also been primary beneficiaries of this in-lieu fee.

In 2010, the CCC produced an inventory of “CCC Special Deposit Account Funds held by the State Controller.”²¹⁷ The inventory covered 19 cases where accounts were created. HI or AYH was the recipient of the funds in seven cases and the intended recipient in two.²¹⁸ Given HI’s status as a CCC-designated recipient of the LCOVA in-lieu fees, it is most likely a biased source on which to rely for the amount of the fee.

214. Hostelling International, “About Hostelling International,” last modified 2014, <https://www.hihostels.com/about-hi/about-hostelling-international>

215. South Coast Area Office, 5-13-0717, 1429 Hermosa, LLC, 18.

216. Hostelling International USA, “About HI-USA,” last modified 2013, <http://www.hiusa.org/about-us>

217. California Coastal Commission, *Status Report on In-Lieu Fees*, 6-12.

218. Ibid.

7.2. As a Legislatively Imposed Fee

When the CCC requires that a city adopt the \$30,000/25% fee as a condition of approval of the city's LCP or related policy, city will generally adopt the fee as a legislatively imposed ordinance. Along with the differences between ad hoc fees and legislatively imposed fees, there is another key distinction: As a legislatively imposed fee, the \$30,000/25% is part of the city's municipal code, meaning that the city, not the CCC, is entity ultimately responsible for the enforcement and operation of the fee. Accordingly, in this case, the city is party burdened with defense the \$30,000/25% fee's legality.

California Courts apply a different standard for legislatively imposed fees than ad hoc fees. The standard for legislatively imposed fees—the reasonable relationship test—is derived from the state's Mitigation Fee Act. The California Supreme Court articulated the elements of this test as follows:

As a matter of both statutory and constitutional law, such fees must bear a reasonable relationship, in both [1] intended use and [2] amount, to the deleterious public impact of the development.²¹⁹

The Court has explained that the reasonable relationship test, although less stringent than the essential nexus and rough proportionality tests, is still a “meaningful means-ends review.”²²⁰

While the relationship between means and ends need not be so close or so thoroughly established for legislatively imposed fees as for ad hoc fees subject to *Ehrlich*, the arbitrary and extortionate use of purported mitigation fees, even where legislatively mandated, will not pass constitutional muster.²²¹

Explained above, the reasonable relationship test is composed of two elements:

1. The fee's intended use must be reasonably related to the development's impact, and
2. The fee's amount must be reasonably related to the development's impact.

When the \$30,000/25% fee is adopted by a jurisdiction as required by the CCC as a condition to approval of an LCP or related policy, it is likely that the \$30,000/25% fee fails the reasonable relationship test. The fee may bare a reasonable relationship between its intended use and the development's impact, but the relationship between the fee's amount and the development's impact is likely insufficiently distant.

219. *San Remo Hotel*, 12 Cal. 4th at 671.

220. *Ibid.*

221. *Ibid.*

7.2.1. Use of Fees-to-Impact of Development Connection

Under the Mitigation Fee Act, there must exist a reasonable relationship between the intended use of the fees and the impact of the proposed development. This element of the reasonable relationship test is virtually the same principle as *Nollan's* essential nexus test. Here again, the development's impact is LCOVA preclusion and the intended use of the fees is LCOVA provision. Imposed legislatively, the \$30,000/25% fee likely bears a reasonable relationship between its intended use and the development's impact.²²²

7.2.2. Amount of Fee-to-Impact of Development Connection

Under the Mitigation Fee Act, there must also exist a reasonable relationship between the amount of the fees and the impact of the development. This element of the reasonable relation test is similar to, but less strict than, to the rough proportionality test. Imposed legislatively, the fee amount-impact connection for the \$30,000/25% fee is likely far too attenuated to pass muster under the reasonable relationship test.

Shown in breakdown performed in Chapter 3, there are three numbers that determine the amount of the LCOVA in-lieu fee:

- The definition higher cost rooms (determined by formula),
- The base fee (\$30,000), and
- The rate at which the base fee is charged (25 percent of higher cost rooms).

Three of the four case studies in Chapter 4 concern the adoption of the LCOVA in-lieu fee byway of LCP:

- City of Ventura, LCP Amendment (2008),
- City of Long Beach, LCP Amendment (2010), and
- City of Solana Beach, LCP Land Use Plan (2012).

222. Other legislatively-imposed fees required by the CCC as a condition for approval of an LCP may not bear a reasonable relationship between its intended use and the development's impact. As explained in Chapters 1 and 4, the 2010 amendment to Long Beach's LCP included, as a CCC condition, two legislatively imposed fees: A version of the \$30,000/25% fee and a one-time \$1.5 million fee (South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 29-30, 36; Long Beach, California, Ordinance No. ORD-11-0017, 16-18). The \$1.5 million fee is charged to the applicant if a hotel of at least 100 rooms is not developed within the first or second phase of the Golden Shore Master Plan (Long Beach, California, Ordinance No. ORD-11-0017, 16-17). The intended use of the fee is to fund LCOVA facilities (such as hostiles, RV parks, and campgrounds) "within or in close proximity to the coastal zone" (*ibid.*, 16). It is unclear, however, what development impact is necessitating that a fee be paid to fund LCOVA facilities. If no hotel or other project is built, then there is still an opportunity for LCOVA facilities to be built. In this situation, there is likely no impact of LCOVA preclusion reasonably related to a fee to fund LCOVA.

Table 14 shows that each of the three case studies, the CCC, with minor exception, locked in the number for each of the three figures as a condition of approval:

Table 16. Local Discretion in Adoption of the LCOVA In-Lieu Fee

City of Ventura, LCP Amendment (2008)	City of Long Beach, LCP Amendment (2010)	City of Solana Beach, LCP Land Use Plan (2012)
Definition of Higher Cost Rooms		
Set at 25% greater than Statewide ADR.	Set at 25% greater than Statewide ADR.	Set at 20% greater than Statewide ADR, with some flexibility for reevaluation over time.
Base Fee		
Set at \$30,000.	Set at \$30,000.	Set at \$30,000 (in 2007) and adjusted for inflation.
Rate at Which Base Fee is Charged		
Set at 25%.	Set at 25%.	Set at 25%.

This element of the reasonable relationship test is discussed below in two contexts:

- For legislatively-imposed LCOVA in-lieu fees enacted in coastal jurisdictions, generally,
- As a legislatively-imposed LCOVA in-lieu fee enacted in Long Beach, specifically.

7.2.2.1. Enacted in Coastal Jurisdictions, Generally

As explained in Chapter 6, legislatively imposed fees are distinguished from ad hoc fees, in part, because legislatively imposed fees are imposed without discretion and are crafted through the political process for approval by an elected body. As required by the CCC in the cases above, the \$30,000/25% fee leaves the local jurisdiction little to no room for discretion in the fee's application. The concern here, however, is that the fees were determined without sufficient consideration of local affordability conditions. As discussed earlier in this chapter all three figures (the definition of higher cost rooms, the base fee, and rate at which the base fee is charged) present issues of bias and lack of specificity. Accordingly, there is likely an insufficient connection between the fee's amount and the development's impact.

7.2.2.2. Enacted in Long Beach, Specifically

Explained in Chapter 1 and as a case study in Chapter 4, Long Beach adopted the \$30,000/25% fee by ordinance in an amendment to its LCP.²²³ Based on reasoning in the CCC's

223. Long Beach, California, Ordinance No. ORD-11-0017, 17-18.

staff report concerning the amendment, when enacted in Long Beach, the amount of \$30,000/25% fee likely does not bear a reasonable relationship to the impacts of the proposed developments, for three reasons:

- The fee does not account for the local affordability conditions;
- The definition of lower cost hotel rates (determining to which rooms the fee applies) was based primarily on an inventory from the City of Ventura, not Long Beach; and
- The fee is applied to 25% of all rooms, not just higher-priced rooms.

7.2.2.2.1. Long Beach Conditions

First, the \$30,000/25% fee fails to account for the City of Long Beach's relatively affordable existing hotel inventory. Shown in Chapter 5, Long Beach's hotel stock along the coast is considerably more affordable than areas in the region and relatively affordable compared to all coastal counties.

The local coastal affordability conditions in Long Beach do not appear to have been sufficiently considered by the CCC when suggesting the City adopt the \$30,000/25% fee. As CCC staff explained:

Although Long Beach (downtown and inland) has a substantial supply of lower-cost motels, there are no overnight accommodations in the Downtown Shoreline area that would be considered affordable or lower-cost. In addition, these lower cost motels are located outside of the coastal zone and could be replaced by higher cost hotels or motels or other uses in the future.²²⁴

However, this statement fails to account for the affordable stock of hotels along the coast in Long Beach, as illustrated in Chapter 5.²²⁵ Also, the CCC offers no evidence to demonstrate the likelihood that lower cost accommodations in Long Beach "could be replaced by higher cost hotels or motels or other uses in the future."²²⁶ Without such evidence, this contention is likely far too attenuated to justify imposition of a fee.

Further, the \$30,000/25% fee considers the particular LCOVA needs created by a hotel development in Long Beach. The \$30,000/25% fee is based on generalized hostel financing figures provided to the CCC by HI and does not speak to needs in Long Beach. Further, applying the principle from *Shappel*, the \$30,000/25% fee is likely suited to address an overall statewide trend rather than an impact of a specific hotel development in Long Beach. This scope

224. South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 33.

225. According to the STR trend reports, the July and August 2010 figures for the City of Long Beach were \$132.73 for the Coastal Zone and \$111.57 for the Five-Mile Zone. The July and August 2010 Statewide ADR was \$116.71.

226. South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 33.

is likely too broad in reach and too distant from Long Beach to meet the reasonable relationship test.

7.2.2.2.2. Ventura Source for Definition of Lower Cost

Second, the CCC's definition of lower cost hotel rates is also likely not reasonably related to the proposed impact of a hotel development in Long Beach. As explained in the staff report, the CCC drew from a hotel inventory in Ventura to arrive at a definition of lower cost in Long Beach.

The hotel room rates in Long Beach are similar to Ventura's rates. Therefore, the definition of low cost accommodations in Long Beach will be defined (for the suggested modification pertaining to Subarea 1a) as those charging less than seventy-five percent (75%), or twenty-five percent (25%) below, the statewide average daily room rate during peak season.²²⁷

The CCC staff report explained the purpose for use of the Ventura rate in the Long Beach LCP Amendment,

A similar comprehensive study [referencing the Ventura case] of all the hotels in Long Beach has not been conducted, although a sampling (2009) of the hotels in or near the Downtown Shoreline area has been done.²²⁸

However, the CCC's sampling of hotels revealed that the hotels around the Downtown Shoreline area in Long Beach are not necessarily comparable to the hotel stock studied in Ventura. For Ventura, the CCC's study of the hotel stock yielded the following results: "Rates then between \$104.50 and \$166.00 would be considered moderately priced for the City of Ventura."²²⁹ For Long Beach, the CCC identified the rates for six "[h]igher-cost hotels in the downtown [Long Beach] area:" "Avia (\$155), Hilton (\$141), Hyatt (\$144), newly renovated Maya (\$155), Renaissance (\$155), and Westin (\$147)."²³⁰ Each of these six CCC-identified "higher-cost" hotels in Long Beach fall within the "moderately priced" range established for Ventura.²³¹

Because the CCC's evidence seems more applicable to Ventura than to Long Beach, the resulting definition of lower cost likely cannot generate a fee amount reasonably related to the impacts of development in Long Beach.

227. Ibid., 34.

228. Ibid.

229. Ibid.

230. Ibid.

231. Ibid.

7.2.2.2.3. 25 Percent of all Rooms

Third, because the version of the \$30,000/25% fee adopted by Long Beach may apply to 25 percent of all rooms for any hotel without LCOVA facilities, the charge levied on a Long Beach hotel development in this case is more punitive than as generally applied on an ad hoc basis by the CCC.

As explained earlier, the CCC generally applied the \$30,000/25% fee to 25 percent of all rooms deemed to be in the Local High Cost Range. As shown above, the CCC-identified “higher-cost” hotels in Long Beach’s downtown would be classified as “moderately priced” based on Ventura hotel rates.²³² Accordingly, based on the CCC’s assumption that Long Beach rates are similar Ventura rates, the \$30,000/25% fee would not be applicable to any hotel in Long Beach’s downtown.

However, the Long Beach LCP Amendment seems to apply the \$30,000/25% fee per all rooms, not just higher cost rooms.²³³ Under this application of the fee, hotels developments under the Long Beach LCP Amendment would likely pay a greater total in-lieu fee than under the typical application of the fee.

Given that the CCC’s assumptions suggest that Long Beach’s hotel stock around the Downtown Shoreline area are relatively affordable, the application of the fee to 25% of all rooms is not reasonably related to the impact of a hotel development in Long Beach.

232. Ibid.

233. Long Beach, California, Ordinance No. ORD-11-0017.

Chapter 8. Recommendations

The preceding chapters present a number of policy and legal problems posed by the LCOVA mitigation fee, particularly as applied in Long Beach. This chapter presents recommendations for the City as it contends with existing and future CCC-required LCOVA mitigation in three situations:

- When facing a CCC-required fee,
- After adoption of a CCC-required fee,
- As a prominent coastal jurisdiction offering input to the CCC.

8.1. When Facing a CCC-Required Fee

Given Chapter 7's findings that the \$30,000/25% fee, when imposed legislatively, likely fails the reasonable relationship test under the Mitigation Fee Act, Long Beach should thoroughly vet the CCC's required LCOVA in-lieu before adopting the fee into its municipal code. Further, given the findings in Chapter 5, Long Beach should insist on an individualized survey of coastal hotel affordability. If no affordability issue exists, Long Beach should challenge the necessity of LCOVA mitigation in its local context. If an affordability issue should arise in Long Beach, the City should:

- Propose to the CCC an alternative mitigation measure, or
- Propose a reduced fee that best reflect the local conditions.

8.1.1. Propose and Alternative Mitigation Measure

The Ventura LCP Amendment case discussed in Chapter 4 suggests that that CCC may be open to entertaining alternative approaches to LCOVA mitigation other than the \$30,000/25% fee. Developing an alternative may require expenditures toward data collection to determine the local affordability conditions, but would likely lead to fewer challenges from developers and cause less complications during implementation.

8.1.2. Propose a Reduced Fee

The 2200 Lee Court case discussed in Chapter 4 may be instructive for the City. In this case, the CCC agreed to reduce the rate at which the base fee (\$30,000) is applied (from 25 percent to 12.5 percent), effectively reducing the total fee by half, after the developer agreed to provide lower cost visitor serving amenities and outfit a number of standard-priced rooms to be

comfortably occupied by a family of six.²³⁴ Two qualifications should be considered when pursuing this approach:

- First, the 2200 Lee Court case made clear that CCC would require both the amenities and an effort reduce rates (such as outfitting the rooms for more people) to consider a reduced LCOVA in-lieu fee.²³⁵
- Second, the degree to which prior CCC staff reports and decisions serve as authoritative precedents is unclear. Although CCC staff reports often cite prior reports and decision in a manner that suggests the weight of precedents, they may not be necessarily binding of in future cases.²³⁶

8.2. After Adoption of a CCC-Required Fee

Once the City adopts a CCC-required fee by ordinance, it has relatively fewer options to oppose the fee. In this situation, the CCC is less relevant as the entity that requires the City adopt the fee as a condition to approval. Instead, the City is the entity responsible for implementing the fee as part of its own body of laws. Although a developer may challenge a city's LCOVA mitigation fee, the developer's and city's interests may be aligned. Two avenues may be available for the City to reduce the potential fallout over its adopted LCOVA mitigation fee:

- Adapt the mitigation measures in a mitigation plan, or
- Challenge the fee as outside the realm of its authority.

8.2.1. Adaptation in the Mitigation Plan

The formulaic nature of legislatively-imposed fees leaves little room for negotiation for the City or developer. However, the City may find room to adapt the mitigation measure, in a

234. San Diego Area Office, 6-13-0407 (*McMillin-NTC, LLC*), 33.

235. *Ibid.*, 34.

236. See South Coast Area Office, *LOB-MAJ-1-10 (1-10) City of Long Beach*, 34-35. "[T]he expectation of the Commission is that developers of sites suitable for overnight accommodations will provide facilities which serve people with a range of incomes. If the development cannot provide for a range of affordability on-site, then off-site mitigation has been required in past commission actions [HNB-MAJ-2-06 (Huntington Beach-Timeshares), San Diego Unified Port District Port District A-6-PSD-8-04/101(Lane Field), A-5-RPV-2-324 (Long Point), RDB-MAJ-2-08 (Redondo Beach), SBV-MAJ-2-08 (Ventura) & 5-98-156-A17 (Long Beach Pike)]...Recent Commission decisions for individual development projects (6-92- 203-A4/KSL, A-6-ENC-07-51, Oceanside LCPA 1-07 & Redondo Beach LCPA 2-08) have required the payment of an in-lieu charge of \$30,000 paid for each required replacement room as a part of the mitigation package. For high cost overnight visitor accommodations where low cost alternatives are not included onsite, a mitigation charge of \$30,000 per room is being required for twenty-five percent (25%) of the high cost rooms constructed (Permit Amendment 5-98-156-A17)" (*ibid.*).

manner consistent with CCC policy and the Long Beach LCP, to better suit the local conditions and meet the applicable California and federal legal standards. For example, the City could consider how the mitigation plan precisely defines LCOVA facilities or how the mitigation plan specifically guides or directs expenditures of the collected funds. The mitigation plan should carefully reference the governing local ordinance, Coastal Act provisions, Mitigation Fee Act provisions, and CCC policy governing the implementation of the mitigation measures.

8.2.2. Challenge the Fee as Beyond the City's Authority

Long Beach may have recourse under the Coastal Act for the City's previously adopted LCOVA mitigation fee measures. California Coastal Section 30005.5 limits the CCC's authority to require cities to enact laws outside of the city's authority:

Nothing in this division [the Coastal Act] shall be construed to authorize any local government, or to authorize the commission to require any local government, to exercise any power it does not already have under the Constitution and laws of this state or that is not specifically delegated pursuant to Section 30519 [which sets forth the procedure for preparation, approval, and certification of LCPs].²³⁷

Accordingly, the CCC cannot condition approval of a city's application for an LCP amendment or other policy upon the city adopting an ordinance beyond its authority, such as violating the Constitution or the Mitigation Fee Act. However, since the CCC approved the LCP amendment, it is unclear if the CCC may or may not revisit the LCOVA issue in the LCP amendment should the fees be stricken as unenforceable.

8.3. Offering Input to the CCC

As mentioned in Chapter 1, the CCC recently revisited its policy and practice regarding LCOVA mitigation. As a prominent coastal city, Long Beach may be in a position to offer the CCC input on the deliberation of this issue. Long Beach could encourage the CCC to consider:

- Develop a LCOVA mitigation practice that better reflects the local hotel affordability conditions. If local conditions are more accurately accounted for in the fee generation formula, it may be a step to remedying the *Dolan* problems.
- Reevaluate the \$30,000 base fee amount reasoning with greater transparency and with additional sources beyond the HI letter.
- Explain the reasoning behind the 25 percent figure. CCC staff reports yield little to no relevant information as to how this figure was developed.
- Clarify the role of CCC staff reports and decisions as precedents for future actions.

²³⁷. Cal. Pub. Res. Code § 30005.5.

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Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
1	This comment is introductory in nature and formally submits an appeal of the Planning Commission's approval of the Breakers Hotel Project.	This comment has been noted and no response required.
2	The appellant expresses concern related to the use of a Categorical Exemption for the project and the Project's compliance with the Long Beach Municipal Code.	This comment summarizes the detailed comments to follow. Refer to subsequent responses to comments related to the applicability of a Categorical Exemption and the Project's compliance with required findings.
3	The comment acknowledges that written comments were provided (Exhibit A) prior to the Planning Commission hearing. The comment states that verbal responses to the written letter were made at the Planning Commission hearing without substantial evidence. The appellant requests that the City Council reverse the Planning Commission's decision and withhold all entitlements until a CEQA-compliant IS and EIR or MND is prepared for the Project.	The written correspondence was received by staff hours prior to the meeting. In the absence of time to prepare written responses to the letter, verbal responses were provided during the hearing. This response to comment matrix and the contents of Attachment J of this City Council letter provide substantial evidence to support the verbal responses supporting the use of a Categorical Exemption.
4	This comment states that the filed appeal is made to exhaust all remedies under the Public Resources Code.	This comment has been noted and no response required.
5	The appellant challenges the Project's qualification for a Categorical Exemption and consistency with the required findings. The comment further	This comment summarizes the detailed comments to follow related to the use of a Categorical Exemption for CEQA compliance. Refer to subsequent responses to comments related to the applicability of a Categorical Exemption. Refer to subsequent detailed

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
	requests the preparation of an EIR or MND.	<p>responses to comments:</p> <ul style="list-style-type: none"> • Responses to Comments 11 through 15; and • Responses to Comments 30 through 57.
6	This comment states that the required findings for the entitlements cannot be made.	<p>This comment summarizes the detailed comments to follow related to the Project's consistency with required findings. Refer to subsequent responses to comments related to the Project's compliance with required findings. Refer to subsequent responses to comments:</p> <ul style="list-style-type: none"> • Responses to Comments 16 through 20; • Responses to Comments 40 through 43; and • Responses to comments 58 through 69.
7	This comment provides a summary of the appellants standing and aggrieved status.	This comment has been noted and no response required.
8	This comment opines that the Planning Commission abused its discretion by failing to prepare a EIR or MND under CEQA requirements and failing to make necessary findings for the requested entitlements. This comment references the fair argument standard and court rulings.	<p>The proposed Project is the reuse of an existing building. The proposed use of the building would be consistent with the original (historical) use of the building, a hotel with food and beverage and accessory uses. The proposed construction associated with the change of use is limited to an addition to accommodate a gurney elevator and code compliant stairwell, accessory outdoor uses on rooftops, and interior remodeling, exterior building renovation, and site improvements in Victory Park. All changes to the building have been found to be consistent with the Secretary of the Interior's (SOI) Standards for Rehabilitation. Furthermore, the reuse of the Breakers Hotel as a hotel or residential use is explicitly noted in PD-6 and the LCP.</p> <p>Categorical Exemptions apply to classes of projects that have been determined not to have a significant effect on the environment and are considered "exempt" from CEQA. The adaptive reuse of an</p>

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
		<p>existing historic building would result in less impact than the potential impacts that would be associated with the construction of a new building at this site consistent with the PD-6 and LCP standards. A traffic study was prepared to demonstrate that the reuse of the existing building would not result in significant impacts. All rehabilitation and renovation plans were approved by the Cultural Heritage Commission and determined to be consistent with SOI Standards for Rehabilitation. The overall scope of work include the adaptive reuse of an existing building, the addition of building area to accommodate a gurney elevator and stairwell, Victory Park improvements, and accessory rooftop terraces on a 0.49-acre site would qualify for a Categorical Exemption under multiple classes included in Article 19 of the CEQA Guidelines.</p> <p>Refer to subsequent detailed responses to comments related to the applicability of a Categorical Exemption for the proposed Project.</p>
9	This comment asserts that the project is subject to exceptions to the exemptions subject to Categorical Exemptions.	<p>Refer to subsequent responses to more detailed appellant comments referring to exceptions to exemptions:</p> <ul style="list-style-type: none"> • Responses to Comments 55 through 57.
10	This comment states that the Planning Commission failed to make necessary findings for the requested entitlements and that the project's design and use are not consistent with relevant planning documents.	<p>This comment summarizes the detailed comments to follow related to the Project's consistency with required findings. Refer to subsequent responses to comments related to the Project's compliance with required findings. Refer to subsequent responses to comments:</p> <ul style="list-style-type: none"> • Responses to Comments 16 through 20; • Responses to Comments 40 through 43; and • Responses to comments 58 through 69.
11	This comment refers to comments raised in Exhibit A. This comment	Refer to responses to comments referred to in Exhibit A submitted prior to the Planning Commission

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
	asserts that the Project does not qualify for any categorical exemption. The comment further states that the project does not qualify for the use of a Class 1 categorical exemption because the project is a radical change in use, which would not be considered “minor” or “negligible”.	<p>hearing on November 15, 2018:</p> <ul style="list-style-type: none"> • Responses to Comments 22 through 71. <p>The Class 1 exemption would apply for the proposed Project because the building would returned to the original use of the building. The number of rooms in the proposed hotel would be less than the previously approved 230-unit congregate care facility. Restaurant and venue space previously existed within the building and would be reconfigured within the building envelope. The addition of a stairwell and elevator is required by Building and Fire Codes to accommodate the reuse of the building. The reuse of the building would not represent a radical change in use because the building use would return to the original hotel use. A traffic study was prepared to demonstrate that the change of use would not result in significant traffic impacts.</p>
12	This comment states that a Class 3 Categorical exemption would not apply because the Project does not involve the construction or conversion of new, small facilities or structures and involves significant building modifications.	The Class 3 exemption would directly apply to the construction of small structures on the rooftop areas, which include a rooftop terrace and restroom and rooftop pool areas.
13	This comment states that the project does not qualify for a Class 31 categorical exemption because the Project involves a radical change in use, which is much more than a simple restoration of an historic landmark.	The SOI Standards for Rehabilitation address the historical use of buildings proposed for rehabilitation or renovation. The project would return the building to its original use as a hotel. The proposed renovation includes restoration of building materials and modifications that were made to accommodate the previous congregate care facility. The stairwell addition is required by Building and Fire Codes. The return to the original building use, restoration of the building, and building modifications were determined to be consistent with the SOI Standards. The

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
		rehabilitation and restoration of the building for the proposed Project would enhance the use of a vacant historic landmark building.
14	This comment states that the project does not qualify for a Class 32 categorical exemption because the Project is inconsistent with the applicable general plan and because it cannot be readily perceived that the Project will not result in any significant effects related to traffic, noise, air quality or water quality.	<p>This comment summarizes the detailed comments to follow related to the Project's consistency with Class 32 Categorical Exemption. Supplemental analysis was incorporated into Attachment J of the City Council letter to confirm use of this exemption. Refer to subsequent responses to comments related to the Project's compliance with the Class 32 Exemption. Refer to subsequent responses to comments:</p> <ul style="list-style-type: none"> • Responses to Comments 40 through 54.
15	This comment states that exceptions-to-the-exemptions apply due to significant cumulative impacts and impacts on historical resources.	<p>Refer to subsequent responses to more detailed appellant comments referring to exceptions to exemptions:</p> <ul style="list-style-type: none"> • Responses to Comments 55 through 57.
16	This comment objects to the Planning Commission's approval of the Entitlements because the required findings cannot be made. This comment further states that the required Site Plan Review findings cannot be made because the Project is not "harmonious, consistent, and complete within itself" due to potential disruptive interactions between the Project and abutting park.	The driveway in Victory Park is an existing condition. The proposed modifications to Victory Park would reduce vehicle-pedestrian conflicts at Ocean Boulevard by relocating a vehicle driveway to Collins Way. The enhancements to Victory Park would improve the overall site design and passive park amenities.
17	This comment states that the required findings cannot be made because the Project proposes to remove significant mature trees	The proposed landscape plan for Victory Park is a conceptual design. The existing trees are proposed to be reused in the final landscape design.

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
	from the site.	
18	This comment states that the required findings cannot be made because the Project conflicts with elements of the Long Beach General Plan and the Downtown Shoreline Area Plan to provide affordable visitor options.	<p>A technical study related to the evaluation of low cost visitor accommodations in the City of Long Beach has been added to Attachment J for reference.</p> <p>Refer to subsequent responses to more detailed appellant comments referring to low cost visitor accommodations:</p> <ul style="list-style-type: none"> • Responses to Comments 41 through 43; and • Responses to Comments 64 through 69;
19	This comment states that the required findings cannot be made because the applicant does not show sufficient evidence that the Project may be granted an alcohol license in an area that is already oversaturated with on-sale alcohol licenses as reported by the Department of Alcohol Beverage Control.	There are existing on-premises alcohol licenses active for the Breakers Building. Because the proposed CUP is not for a new license, the concentration of alcohol licenses in a census tract would not apply. The CUP is to document the floor plan for venue spaces that are already covered by the existing alcohol licenses.
20	This comment states that the required findings for the LCDP cannot be made because the Project does not provide low-cost visitor accommodations and therefore conflicts with the public access and recreation policies of Chapter 3 of the Coastal Act.	<p>A technical study related to the evaluation of low cost visitor accommodations in the City of Long Beach has been added to Attachment J for reference.</p> <p>Refer to subsequent responses to more detailed appellant comments referring to low cost visitor accommodations:</p> <ul style="list-style-type: none"> • Responses to Comments 41 through 43; and • Responses to Comments 64 through 69;
21	This comment states that the appellants reserve the right to supplement these comments and hearings and proceedings for this Project.	This comment has been noted. The appellant has been included on all public noticing.

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
	This comment further requests that the Appellants are included on the notice list for all notices of CEQA actions, Appeal hearings, and any approvals, Project CEQA determinations, or public hearings to be held on the Project.	
22	This letter was submitted via email on November 15, 2018. This comment is introductory in nature and formally submits written comments regarding the Breakers Hotel Project. The commenter expresses concern related to the Project's compliance with CEQA and the Long Beach Municipal Code.	This comment has been noted and no response required.
23	This comment opines that the Project does not qualify for any of the four different classes of categorical exemption Applicant seeks (Class 1, Class 3, Class 31, and Class 32) due to the proposed dramatic change in use.	The Class 1 exemption would apply for the proposed Project because the building would be returned to the original use of the building. The number of rooms in the proposed hotel would be less than the previously approved 230-unit congregate care facility. Restaurant and venue space previously existed within the building and would be reconfigured within the building envelope. The addition of a stairwell and elevator is required by Building and Fire Codes to accommodate the reuse of the building. The reuse of the building would not represent a radical change in use because the building use would return to the original hotel use. A traffic study was prepared to demonstrate that the change of use would not result in significant traffic impacts. Supplemental analysis is included in Attachment J to demonstrate that no traffic or air quality impacts would occur with the reuse of the building as a hotel (original use).

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
24	This comment states that the Traffic Impact Study is too narrow to have accurately studied the traffic impacts of the proposed Project.	The traffic study was prepared consistent with the City of Long Beach traffic impact analysis guidelines. An expanded cumulative projects list was analyzed in a supplemental traffic analysis included in Attachment J. No significant traffic impacts would occur under the expanded cumulative projects analysis.
25	This comment expresses concern about the Project's impacts on historical resources and the building's eligibility for the California and National Registers of Historic Places.	The SOI Standards for Rehabilitation address the historical use of buildings proposed for rehabilitation or renovation. The project would return the building to its original use as a hotel. The proposed renovation includes restoration of building materials and modifications that were made to accommodate the previous congregate care facility. The stairwell addition is required by Building and Fire Codes. The return to the original building use, restoration of the building, and building modifications were determined to be consistent with the SOI Standards. The rehabilitation and restoration of the building for the proposed Project would enhance the use of a vacant historic landmark building.
26	This comment opines that the required findings for the requested entitlements cannot be made and that the Planning Commission cannot grant them at this time.	This comment summarizes the detailed comments to follow related to the Project's consistency with required findings. Refer to subsequent responses to comments related to the Project's compliance with required findings. Refer to subsequent responses to comments: <ul style="list-style-type: none"> • Responses to Comments 16 through 20; • Responses to Comments 40 through 43; and • Responses to comments 58 through 69.
27	This comment asserts that the Planning Commission should reject the requested CE and land use entitlements, and direct the City to prepare an Initial Study and EIR or	This comment summarizes the appellants request for additional environmental analysis. See subsequent detailed comments and responses related to the applicability of a Categorical Exemption for this

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
	MND.	project.
28	This comment provides project background.	Comment noted and no response required.
29	This comment provides a summary of the appellants standing and aggrieved status.	This comment has been noted and no response required.
30	This comment references the fair argument standard and court rulings.	Refer to response to Comment 8.
31	This comment references exceptions to the exemptions subject to Categorical Exemptions and court rulings.	Refer to subsequent responses to more detailed appellant comments referring to exceptions to exemptions: <ul style="list-style-type: none"> • Responses to Comments 55 through 57.
32	This comment asserts that the Project does not qualify for any class of categorical exemption and states that the Planning Commission must reject Applicant's request that the Project be found categorically exempt from CEQA.	Refer to responses to comments referred to in Exhibit A submitted prior to the Planning Commission hearing on November 15, 2018: <ul style="list-style-type: none"> • Responses to Comments 32 through 54.
33	This comment states that Class 1 categorical exemptions are meant to apply to projects involving no change in use. The commenter states that the subject property is completely out of use at this time and the proposed use does not qualify for a Class 1 categorical exemption.	The Class 1 exemption would apply for the proposed Project because the building would returned to the original use of the building. The number of rooms in the proposed hotel would be less than the previously approved 230-unit congregate care facility. Restaurant and venue space previously existed within the building and would be reconfigured within the building envelope.
34	This comment asserts that if the Project involved negligible or no expansion of use, it would not	The addition of a stairwell and elevator is required by Building and Fire Codes to accommodate the reuse of the building. The stairwell addition is minor when

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
	qualify for a Class 1 categorical exemption because the alterations to the structure are not "minor" and the widening of the driveway would increase hardscape.	evaluated in light of the size of the existing building. The improvements to Victory Park driveway area are minor in consideration of the existing conditions in the park.
35	This comment summarizes that the commenter asserts that the Project does not qualify for a Class 1 categorical exemption.	The proposed project is the reuse of an existing building and returning the use to a hotel (original use). The previous use contained more residential units than the proposed number of rooms for the hotel.
36	This comment states that the Project does not involve the construction of new, small facilities or structures and is not a conversion of existing small structures from one use to another.	The Class 3 exemption would directly apply to the construction of small structures on the rooftop areas, which include a rooftop terrace and restroom and rooftop pool areas.
37	This comment states that the Project also does not qualify for a Class 3 categorical exemption because it would involve significant modifications to the exterior of the structure, driveway expansion, and the addition of a swimming pool deck and terrace.	The Class 3 exemption applies to new structures on rooftop areas.
38	This comment summarizes that the commenter asserts that the Project does not qualify for a Class 3 categorical exemption.	The Class 3 exemption would directly apply to the construction of small structures on the rooftop areas, which include a rooftop terrace and restroom and rooftop pool areas.
39	This comment states that the Project does not qualify for the Class 31 categorical exemption because the Project involves a radical change and intensification	The SOI Standards for Rehabilitation address the historical use of buildings proposed for rehabilitation or renovation. The project would return the building to its original use as a hotel. The proposed renovation includes restoration of building materials and

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
	in use, from an out-of-use congregate care facility to a brand-new hotel. The comment further states the Planning Commission cannot find that it is "limited" to the restoration of the structure as an historical resource.	modifications that were made to accommodate the previous congregate care facility. The stairwell addition is required by Building and Fire Codes. The return to the original building use, restoration of the building, and building modifications were determined to be consistent with the SOI Standards. The rehabilitation and restoration of the building for the proposed Project would enhance the use of a vacant historic landmark building.
40	This comment states that Class 32 categorical exemptions are limited to in-fill development projects that are "consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations" and "would not result in any significant effects relating to traffic, noise, air quality or water quality." The commenter further asserts that the Project does not qualify for a Class 32 categorical exemption because it is (1) inconsistent with the applicable general plan and (2) because it cannot be readily perceived that the Project will not result in any significant effects relating to traffic, noise, air quality or water quality.	This comment summarizes the detailed comments to follow related to the Project's consistency with Class 32 Categorical Exemption. Supplemental analysis was incorporated into Attachment J of the City Council letter to confirm use of this exemption. Refer to subsequent responses to comments related to the Project's compliance with the Class 32 Exemption. Refer to subsequent responses to comments: <ul style="list-style-type: none"> Responses to Comments 41 through 54.
41	This comment states that the Project is inconsistent with applicable land use plans and zoning. The commenter references a standard included in the PD-6 that requires the City to develop	Attachment J includes a technical report that addresses Low Cost Visitor Accommodations in the City of Long Beach Coastal Zone areas. The requirement for mitigation related to low cost accommodations is called out for Subarea 1a of PD-6.

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
	and program/policy that protects and encourages lower cost visitor accommodations. The comment further states that the Project conflicts with this standard because the hotel would include luxury amenities strongly suggesting that it will provide expensive rather than affordable overnight visitor accommodations.	
42	The comment states that the Project does not provide enough public benefits. The comment states that the hotel and restaurant/venue uses would be contained within a private development. The commenter further suggests A project of this magnitude would better serve the community as housing and with ancillary uses that genuinely serve the public, such as, for example, meeting spaces that could be reserved out free of charge or public art gallery space.	PD-6 permits the reuse of the Breakers Building for a hotel use. The provision of hotel rooms would provide more of a public benefit than residential use because it provides accommodations to permit visitors to access the coast. The proposed hotel use would be more consistent with the provisions of the Coastal Act than a residential use. PD-6 does not include a provision requiring public benefits such as meeting spaces that could be reserved free of charge or public art gallery space. The proposed modifications to Victory Park include new amenities to enable public benefits because the new park amenities (seating areas, signage, lighting, trash receptacles) would add more passive park use as compared to existing conditions.
43	The comment summarizes that the Project does not qualify for a Class 32 categorical exemption because it conflicts with applicable general plan policies in that it does not propose affordable accommodations nor is it proposed to provide enough public benefits.	Attachment J includes a technical report that addresses Low Cost Visitor Accommodations in the City of Long Beach Coastal Zone areas. The requirement for mitigation related to low cost accommodations is called out for Subarea 1a of PD-6.
44	The comment states that the project may have significant traffic impacts because the Traffic Impact	The traffic study was prepared consistent with the City of Long Beach traffic impact analysis guidelines. An expanded cumulative projects list was analyzed in

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
	Study fails to provide an accurate and conservative traffic analysis. The commenter requests a revised traffic study must be prepared.	a supplemental traffic analysis included in Attachment J. No significant traffic impacts would occur under the original or expanded cumulative projects analysis.
45	This comment states that the traffic study was narrow and only ten intersections.	The traffic study was prepared consistent with the City of Long Beach traffic impact analysis guidelines, including the number of intersections evaluated.
46	This comment asserts that nearby intersections nearby the Project Site are already operating at or near a LOS of E or F and/or anticipated to be operating at such levels. The commenter references previous traffic counts conducted between 2008-2016. The comment requests these intersections must be analyzed in a revised traffic study.	The traffic study was prepared consistent with the City of Long Beach traffic impact analysis guidelines. Level of Service (LOS) conditions change over time and the analysis included in the study is consistent with the guidelines for evaluating potential traffic impacts.
47	This comment asserts that the traffic study conducted only a single a.m./p.m. traffic count on June 7, 2018 and the traffic volumes recorded seem to be significant lower than traffic counts previously conducted by other projects.	The traffic study was prepared consistent with the City of Long Beach traffic impact analysis guidelines. Intersection traffic count data was obtained consistent with the City's guidelines.
48	This comment asserts that the traffic study appears to have recorded significantly lower baseline traffic counts in at least these five intersections. The comment states that the that the traffic count conducted for Project study is a potential outlier, which warrants utilizing the highest value	The traffic study was prepared consistent with the City of Long Beach traffic impact analysis guidelines. See above.

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
	of known traffic counts conducted in the area and additional traffic counts should be performed.	
49	This comment states that the traffic study fails to identify numerous related projects that should have been incorporated into the analysis.	The list of projects provided by the applicant was reviewed. Some of the cited projects are constructed and operational, and therefore would be included in the baseline conditions reflected in existing traffic counts. Other pending projects were added to a supplemental traffic analysis included in Attachment J and no significant traffic impact would occur.
50	This comment states that the traffic study applied various trip credits in its estimate of the Project's trip generation that appear to be much higher than the trip credits applied to similar hotel/mixed-use projects near the LA Convention Center located in the City of Los Angeles. The commenter requests that the traffic study should be revised using more conservative and appropriate trip credits.	The site context is different from the example provided for the projects near the LA Convention Center. The traffic study was prepared consistent with the City of Long Beach traffic impact analysis guidelines.
51	This comment states that the traffic study analyzes only the estimated traffic impacts of the operational phase of the Project and ignores potential traffic impacts during the construction phase. The commenter requests that the traffic study be revised to analyze construction impacts. The comment summarizes that the Project does not qualify for a Class 32 categorical exemption because it may result in traffic impacts and	The project is the adaptive reuse of an existing building. Construction trips would be temporary in duration. Adaptive reuse involves very limited grading and fewer construction trips than new construction.

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
	requests a revised analysis.	
52	The comment states that the Project does not qualify for a Class 32 categorical exemption because it may have significant noise impacts. The commenter asserts that no noise analysis was prepared for the project and states that the Project will introduce substantial new noise sources.	The project would be the reuse of an existing building. The primary hotel and accessory uses would be contained within a building consistent with the downtown urban setting. All open rooftop areas would be required to comply with the Municipal Code related to noise.
53	The comment states that the Project does not qualify for a Class 32 categorical exemption because it may have significant air quality impacts. The commenter asserts that the constriction trips and intensification of use may result in air quality impacts.	A CalEEMod output worksheet was added to Attachment J to verify that the construction and operation of the use would not exceed daily thresholds established for the South Coast Air Quality Management District.
54	The comment states that the Project does not qualify for a Class 32 categorical exemption because it may have significant water quality impacts due to proximity to off-site locations.	The project is the reuse of an existing building. All referenced locations are off-site. All improvements in Victory Park are required to meet LID requirements.
55	The comment states that multiple exceptions to exemptions apply to this Project because of significant cumulative impacts and potentially adverse impacts on historical resources.	Refer to subsequent detailed comments about exceptions to the exemptions. There would be no cumulative traffic or air quality impacts and all modifications to the building would be consistent with the SOI Standards for Rehabilitation.
56	This comment cites the exception to the exemption applies due to cumulative impacts caused by other projects in the area. A list of	The list of projects provided by the applicant was reviewed. The cited projects are pending projects were added to a supplemental traffic analysis included in Attachment J and no significant

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
	projects are included in this comment.	cumulative traffic impact would occur.
57	This comment states that the project would be excepted from an exemption due to significant cumulative impacts and potential adverse impacts on the significance of a historical resource. The comment states that the proposed modifications to the existing building could threaten the building's eligibility for designation as a local landmark or for inclusion in the California Register of Historical Resources.	<p>The SOI Standards for Rehabilitation address the historical use of buildings proposed for rehabilitation or renovation. The project would return the building to its original use as a hotel. The proposed renovation includes restoration of building materials and modifications that were made to accommodate the previous congregate care facility. The stairwell addition is required by Building and Fire Codes. The return to the original building use, restoration of the building, and building modifications were determined to be consistent with the SOI Standards. The rehabilitation and restoration of the building for the proposed Project would enhance the use of a vacant historic landmark building.</p> <p>There would be no substantial change to a historic resource that would disqualify the use of a Class 31 Categorical Exemption.</p>
58	This comment states that the required findings for the requested entitlements cannot be made. The commenter asserts that the Project may negatively impact the abutting Victory Park, requiring further consideration of the interaction between the two sites. The comment further states that the vehicular driveway to the Breakers Hotel has potential for vehicular-pedestrian accidents and interrupt recreation in the park due to consistent vehicular entrances to the Project for all of its uses.	The driveway in Victory Park is an existing condition. The proposed modifications to Victory Park would reduce vehicle-pedestrian conflicts at Ocean Boulevard by relocating a vehicle driveway to Collins Way. The enhancements to Victory Park would improve the overall site design and passive park amenities. This Site Plan Review finding can be made in the affirmative.

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
59	The comment states that the Site Plan review finding related to mature trees cannot be made. The commenter states that the relocation of the palm trees in the landscape plan could harm the trees, and that no evidence suggests that there is no possible alternative design.	The landscape plan is conceptual in nature. As conditioned, the non-native palm trees would be incorporated into the final landscape design. The finding addresses tree removal. This Site Plan Review finding can be made in the affirmative.
60	This comment states that the Project conflicts with elements of PD-6 related to lower cost visitor accommodations. The comment further states that the only option for parking off-site valet parking, which may deter middle or low-income guests, which separates the Project from goals to provide affordable visitor options.	Attachment J includes a technical report that addresses Low Cost Visitor Accommodations in the City of Long Beach Coastal Zone areas. The requirement for mitigation related to low cost accommodations is called out for Subarea 1a of PD-6. There is no on-site parking. The reuse of the Breakers Building, as outlined in PD-6, does not require the addition of parking. The provision of parking is to enable the viable use of the building. The provision of off-site also parking meets the CUP findings. PD-6 does not include a requirement for the provision of low-cost or free off-site parking.
61	This comment states that conditions of approval that would substantially alter the Project and that should be completed before granting the CUP. The commenter further states that requirements listed for the hotel operations plan and should be reviewed prior to approval of the CUP.	The conditions of approval must be satisfied prior to the issuance of building permits or business licenses. An operations plan is contingent on the final operation information of the venues. This is a typical condition of approval for use-related entitlements. The operations plan must demonstrate compliance with all code requirements.
62	The comment restates the required finding and that the census tract is oversaturated with on-sale alcohol licenses. The comment further states that the new extensions	There are existing on-premises alcohol licenses active for the Breakers Building. Because the proposed CUP is not for a new license, the concentration of alcohol licenses in a census tract would not apply. The CUP is to document the floor plan for venue spaces that are

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
	allow for an increase in number of on-site venues where alcoholic beverages may be consumed, potentially increasing the alcohol consumption overall.	already covered by the existing alcohol licenses.
63	The comment summarizes that the required findings for a CUP for on-sale alcohol cannot be made.	The existing licenses, which cover the entire building, will be transferred to the building ownership. The findings related to oversaturation of licenses would not apply to this CUP application.
64	The comment asserts that neither LCDP finding can be made because the proposed Project is inconsistent with the Local Coastal Program (LCP) and does not conform to the public access and recreation policies of Chapter 3 of the Coastal Act.	As noted in the LCDP findings, the proposed use enhances access to the coast by providing hotel accommodations in the Coastal Zone. The incorporation of a TDM Plan for employees and patrons furthers the hotel's consistency with Chapter 3 of the Coastal Act's provision for non-vehicular access. In addition, the improvements in Victory Park enhance pedestrian access and facilities in the park.
65	The comment states that the Project is inconsistent with the LCP because the Project does not strengthen the entry to Promenade South on Ocean Boulevard at the southeast corner of Pine Avenue as required by the provisions of Area 14, Breakers, of the Downtown Shoreline Policy Plan. The commenter asserts that providing visitor-serving uses' cannot substitute for a requirement to strengthen an entry to the Promenade South. The commenter suggests that this goal could be accomplished by widening the pathway to or explicitly directing pedestrians towards the	The proposed use is the reuse of an existing building on a separate parcel from the Promenade entrance. The suggested widening of a pathway to the Promenade is already achieved by retaining the existing walkway along the driveway entrance. The building is on a separate city block from the subject Promenade entrance and there are no additional on-site enhancements that would apply to this PD-6 standard.

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
	Promenade.	
66	The comment states that the Project does not comply with PD-6, Subarea 7, which requires a project that includes a change of use of an existing building to "provide for the eastward continuation of the east/west pedestrian walkway across the subject sites."	The east/west pedestrian walkway is not located on the Breakers site. There are no additional on-site enhancements that would apply to this PD-6 standard.
67	The comment states that the second required finding cannot be made because the Project does not encourage lower cost recreational and visitor facilities. The comment cites the Coastal Act's goal related to public access to and along the coast. The commenter asserts that in order to fully comply with the Coastal Act, the Project should maximize public uses within the building and ensure that they are accessible to lower-income patrons.	<p>Attachment J includes a technical report that addresses Low Cost Visitor Accommodations in the City of Long Beach Coastal Zone areas. The requirement for mitigation related to low cost accommodations is called out for Subarea 1a of PD-6.</p> <p>PD-6 does not include a provision requiring public benefits such as meeting spaces that could be reserved free of charge or public art gallery space. The proposed modifications to Victory Park include new amenities to enable public benefits because the new park amenities (seating areas, signage, lighting, trash receptacles) would add more passive park use as compared to existing conditions.</p> <p>As noted in the LCDP findings, the proposed use enhances access to the coast by providing hotel accommodations in the Coastal Zone. The incorporation of a TDM Plan for employees and patrons furthers the hotel's consistency with Chapter 3 of the Coastal Act's provision for non-vehicular access. In addition, the improvements in Victory Park enhance pedestrian access and facilities in the park.</p>
68	The comment expresses concern that the conditions of the area outlined in the LCP are nearly four decades old. The commenter states	The PD-6 standards are included in the certified LCP. The LCP has been certified by the California Coastal Commission and are the applicable development standards established for the subject site.

Table 1: Danielle Wilson representing UNITE HERE Local 11 (APL18-002) and Jeremy Arnold (APL18-003)

Comment Number	Comment Summary	Response
	that the City should not consider further changes within the Coastal Zone until the LCP is updated and fully certified by the California Coastal Commission.	
69	The comment states that the required findings of fact for the LCDP cannot be made due to inconsistencies with applicable land use plans and Chapter 3 of the Coastal Act.	As noted above, the provision of hotel accommodations improves access to the coast as compared to other permitted uses for this site (residential). The enhancements to Victory Park and the TDM Plan would be consistent with Chapter 3 of the Coastal Act as it pertains to vehicular and pedestrian access to the coast.
70	The commenter summarizes concerns related to potential environmental impacts related to CEQA and compliance with the Municipal Code. The Commenter requests that the Planning Commission deny the CE and land use entitlements and that the City prepare an Initial Study and an EIR, or, at the very least, an MND.	This summary comment is noted. Based on the responses to comments above, the Project would qualify for a Categorical Exemption and all findings can be made for the requested entitlements.
71	<p>This comment states that the appellants reserve the right to supplement these comments and hearings and proceedings for this Project.</p> <p>This comment further requests that the Appellants are included on the notice list for all notices of CEQA actions, Appeal hearings, and any approvals, Project CEQA determinations, or public hearings to be held on the Project.</p>	Comment noted. The appellant has been included on all public noticing.

Table 2: David P. Denevan (APL18-005)

Comment Number	Comment Summary	Response
1	This comment is a letter from the California Coastal Commission to the City of Long Beach Department of Planning and Building dated April 4, 2003. The letter addresses previous development within the Victory Park area at the Camden Development.	This comment has been noted.
2	This comment is an introduction to the commenter's appeal of the Planning Commission's approval of Victory Park improvements in front of the Breakers Hotel. The commenter further states no objection to the conversion of the Breakers to a hotel.	This comment is introductory in nature and the subject of this appeal of the Victory Park design is noted.
3	The commenter requests keeping the lawn and installing moisture sensors to conserve water. The commenter states that lush, green public spaces are needed.	The proposed landscape plan is conceptual in nature and, as conditioned, the final design will be subject to approval by the Director of Development Services. The conceptual landscape design is to show the decision makers the proposed overall layout of the modifications of the driveways and changes to walkways. The proposed landscaping would be lush landscape areas that also meet Model Water Efficient Landscape Ordinance (MWELO) standards. The conceptual landscape palette would provide lush green spaces that will enhance Victory Park, while also softening the context of the built environment.
4	This comment provides background information about the history of Victory Park.	This background information on Victory Park has been noted.
5	The comment requests the following with reference to the Victory Park Design Guidelines:	The existing driveway would provide a more continuous frontage of park space

Table 2: David P. Denevan (APL18-005)

Comment Number	Comment Summary	Response
	<ol style="list-style-type: none"> 1. No loss of park space. 2. Preservation of lawn area as grass. 3. Concrete park identification signage. 4. Wood and steel benches, no concrete benches. 5. Drinking fountain and trash receptacles. 6. Limit sidewalk to 8 feet in width with no staggered sections of concrete walk. 	<p>along Ocean Boulevard. Under existing conditions, the driveway separates the lawn area from planting areas along Collins Way. The relocated driveway would enhance the frontage of Victory Park and reduce pedestrian-vehicle conflict at Ocean Boulevard. The driveway widening would increase hardscape, but would provide for an overall enhancement to the park.</p> <p>As previously noted, the landscape design is conceptual in nature. Final design of park signage, benches, drinking fountain, and trash receptacles will be approved pursuant to the design guidelines.</p> <p>The design guidelines permit the use of concrete sculptural benches in certain conditions. The final design of the benches will be required to be consistent with provisions included in the guidelines.</p> <p>There is a continuous existing brick walkway along the circular driveway that provide two pedestrian paths through the park. The existing path along the driveway entrance area would maintain the path with new paving materials and a paved area near proposed clustered seating. The path that formally was at the driveway exit would be moved towards the middle of the park and maintain an 8 foot width through the park to access additional seating areas. The path widens near the paved area in front of the Breakers</p>

Table 2: David P. Denevan (APL18-005)

Comment Number	Comment Summary	Response
		Building, which aligns with the existing brick path that wraps around the driveway.
6	This comment includes the same content as the previous letter, but is addressed to the Mayor and City Council.	Refer to responses to comments 2 through 5.
7	This comment states that the landscape plan for Victory Park in front of the Breakers does not comply with the Victory Park Design Guidelines. The comment further states that there is not enough grass and too much paving that would reduce park space.	Due to efforts to reduce water consumption, the conceptual landscape plan has included a planting palette to comply with the MWEL. The existing driveway does not provide a functional design for accessing the site and interrupts landscape areas in Victory Park. The reconfiguration of the driveway would reduce pedestrian-vehicle conflict at Ocean Boulevard and provide a more continuous span of park space uninterrupted by vehicles. Replacement park space will be provided off-site to accommodate the widened driveway area.
8	This comment asserts that the guidelines are not suggestions and carry out the LCP for the park.	The Victory Park Design Guidelines are guidelines to which the conceptual landscape design has been determined to meet the intent of the guidelines.
9	This comment provides background information about the history of Victory Park.	This background information on Victory Park has been noted.
10	This comment notes that benches and light fixtures were removed from Victory Park in front of the Breakers decades ago.	The conceptual landscape plan proposes to reintroduce benches and light fixtures into the portion of Victory Park in front of the Breakers Hotel.
11	This comment provides background on the efforts to provide park signage, benches, drinking fountains, trash containers and trees in	This background information on Victory Park has been noted.

Table 2: David P. Denevan (APL18-005)

Comment Number	Comment Summary	Response
	Victory Park.	
12	This comment consists of the Victory Park Design Guidelines and newspaper publications about Victory Park.	This background information on Victory Park has been noted.