LOS ANGELES
DEPARTMENT OF CITY
PLANNING
221 North Figueroa St., Suite 1350
Los Angeles, CA 90012

INITIAL STUDY

Hilton Universal City Project

Case Number: ENV-2017-5424-EIR

Project Location: 555 E. Universal Hollywood Drive, Universal City, CA 91608

Community Plan Area: Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass

Council District: CD-4 Ryu

Project Description: The Project would expand existing hotel facilities within the approximately 7.26-acre Hilton Universal City Hotel property (Project Site). The Project Site is developed with a 24-story hotel building with 495 guestrooms (Existing Hotel Building), an attached ancillary hotel building providing meeting/banquet rooms and ancillary hotel uses (Ancillary Hotel Building), a three-level subterranean parking garage, circulation facilities (i.e. internal driveway and service road), an outdoor pool area (Existing Outdoor Pool Area), and other related improvements.

The Project would include: a new 20-story Hotel Expansion Building (with 395 guest rooms and a spa limited to guests and 250 non-guest members) with a new single-level lobby connecting to the Existing Hotel Building; a one-story addition to the Ancillary Hotel Building consisting of a Junior Ballroom (5,000 SF) /Meeting Room (10,000 SF) Addition; a 3-level expansion of the existing below grade subterranean parking garage; a revised surface parking program; a new Gate Entryway structure; and, landscape and hardscape improvements to the existing Level 3 automobile forecourt throughout much of the Project Site. A limited amount of interior revisions to create the lobby connection between the two buildings would occur within the footprint of the Existing Hotel Building. Also, new outdoor pool areas would be developed as part of the Project on Level 3 and the Rooftop deck of the Hotel Expansion Building. The Existing Pool Area would be eliminated and replaced by a green zone for guest outdoor use. Atop the Hotel Expansion Building on the 17th Level would be a restaurant (5,000 square feet), an indoor/outdoor bar (1,500 square feet), and the Rooftop Pool Deck. Overall, the Project would add approximately 300,000 square feet of additional floor area to the Project Site. The Project would provide a minimum of 408 new vehicle parking spaces to accommodate additional employees, hotel guests and restaurant/spa visitors. Upon completion of the Project, the Hilton Universal City Hotel would provide a maximum of 890 guestrooms and 697,521 square feet of floor area, and a resulting floor area ratio of (FAR) of approximately 2.2:1 for the Project Site.

PREPARED FOR:	**PREPARED BY:**	**APPLICANT:**
The City of Los Angeles Department of City Planning	ESA	Hillcrest Real Estate, LLC.

October 2020

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1 INTRODUCTION

An application for the proposed Hilton Universal City Project (Project) has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The City of Los Angeles (City), as lead agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA), and that the preparation of an Initial Study is required.

This Initial Study evaluates the potential environmental effects that could result from the construction, implementation, and operation of the proposed Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.), and the City's L.A. CEQA Thresholds Guide. The City uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in this document. Based on the analysis provided within this Initial Study, the City has concluded that the Project may result in significant impacts on the environment and the preparation of an Environmental Impact Report (EIR) is required. This Initial Study (and the forthcoming EIR) are intended as informational documents, which are ultimately required to be considered and certified by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE OF AN INITIAL STUDY

CEQA was enacted in 1970 with several basic purposes, including: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

An Initial Study is a preliminary analysis conducted by the lead agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the lead agency shall prepare a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration is appropriate. If the Initial Study concludes that neither a Negative Declaration nor Mitigated Negative Declaration is appropriate, an EIR is normally required.[1]

[1] State CEQA Guidelines Section 15063(b)(1) identifies the following three options for the lead agency when there is substantial evidence that the project may cause a significant effect on the environment: "(A) Prepare an EIR, or (B) Use a previously prepared EIR which the lead agency determines would adequately analyze the project at hand, or (C) Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration.

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1 INTRODUCTION

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

2 EXECUTIVE SUMMARY

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

3 PROJECT DESCRIPTION

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

4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

1.3 CEQA PROCESS

Below is a general overview of the CEQA process. The CEQA process is guided by the CEQA Statutes and Guidelines, which can be found on the State of California's website (http://resources.ca.gov/ceqa).

1.3.1 Initial Study

At the onset of the environmental review process, the City has prepared this Initial Study to determine if the proposed Project may have a significant effect on the environment. This Initial Study determined that the proposed Project may have a significant effect(s) on the environment and an EIR will be prepared.

A Notice of Preparation (NOP) is prepared to notify public agencies and the general public that the lead agency is starting the preparation of an EIR for the proposed project. The NOP and Initial Study are circulated for a 30-day review and comment period. During this review period, the lead agency requests comments from agencies and the public on the scope and content of the environmental information to be included in the EIR. After the close of the 30-day review and comment period, the lead agency continues the preparation of the Draft EIR and any associated technical studies, which may be expanded in consideration of the comments received on the NOP.

1.3.2 Draft EIR

Once the Draft EIR is complete, a Notice of Completion and Availability is prepared to inform public agencies and the general public of the availability of the document and the locations where the document can be reviewed. The Draft EIR and Notice of Availability are circulated for a 45-day review and comment period. The purpose of this review and comment period is to provide

public agencies and the general public an opportunity to review the Draft EIR and comment on the document, including the analysis of environmental effects, the mitigation measures presented to reduce potentially significant impacts, and the alternatives analysis. After the close of the 45-day review and comment period, responses to comments on environmental issues received during the comment period are prepared.

1.3.3 Final EIR

The lead agency prepares a Final EIR, which incorporates the Draft EIR or a revision to the Draft EIR, comments received on the Draft EIR and list of commenters, and responses to significant environmental points raised in the review and consultation process.

The decision-making body then considers the Final EIR, together with any comments received during the public review process, and may certify the Final EIR and approve the project. In addition, when approving a project for which an EIR has been prepared, the lead agency must prepare findings for each significant effect identified, a statement of overriding considerations if there are significant impacts that cannot be mitigated, and a mitigation monitoring program.

2 EXECUTIVE SUMMARY

PROJECT TITLE	**Hilton Universal City Project**
ENVIRONMENTAL CASE NO.	ENV-2017-5424-EIR
RELATED CASES	CPC-2017-5423-VZC-HD-CU-CUB-CUX-DD-SPR

PROJECT LOCATION	555 E. Universal Hollywood Drive, Universal City, CA 91608
COMMUNITY PLAN AREA	Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass
GENERAL PLAN DESIGNATION	Regional Center Commercial
ZONING	C2-1 (Commercial Zone, Height District 1); PB-1 (Parking Building, Height District 1); and RE15-1-H (Residential Estate Zones, Height District 1, Hillside Area)
COUNCIL DISTRICT	CD-4 Ryu

LEAD AGENCY	**City of Los Angeles**
CITY DEPARTMENT	Department of City Planning
STAFF CONTACT	Bradley Furuya
ADDRESS	201 N. Figueroa St. Suite 1350 Los Angeles, CA 90012
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APPLICANT	Hillcrest Real Estate, LLC
ADDRESS	555 Universal Hollywood Drive, Universal City, CA 91608
PHONE NUMBER	(213) 229-9548

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Bradley Furuya, City Planning Associate	October 6, 2020
PRINTED NAME, TITLE	**Date**

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).

5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.

   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated

7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.

9) The explanation of each issue should identify:

   a) The significance criteria or threshold, if any, used to evaluate each question; and

   b) The mitigation measure identified, if any, to reduce the impact to less than significance.

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Project would expand existing Hilton Universal City Hotel (Hotel) facilities within the approximately 7.26-acre Hotel property (Project Site). The Project Site is developed with a 24-story hotel building containing 495 guestrooms (Existing Hotel Building), an attached ancillary hotel building providing meeting/banquet rooms and ancillary hotel uses (Ancillary Hotel Building), a three-level subterranean parking garage, circulation facilities (i.e. internal driveway and service road), an outdoor pool area (Existing Outdoor Pool Area), and other related improvements.

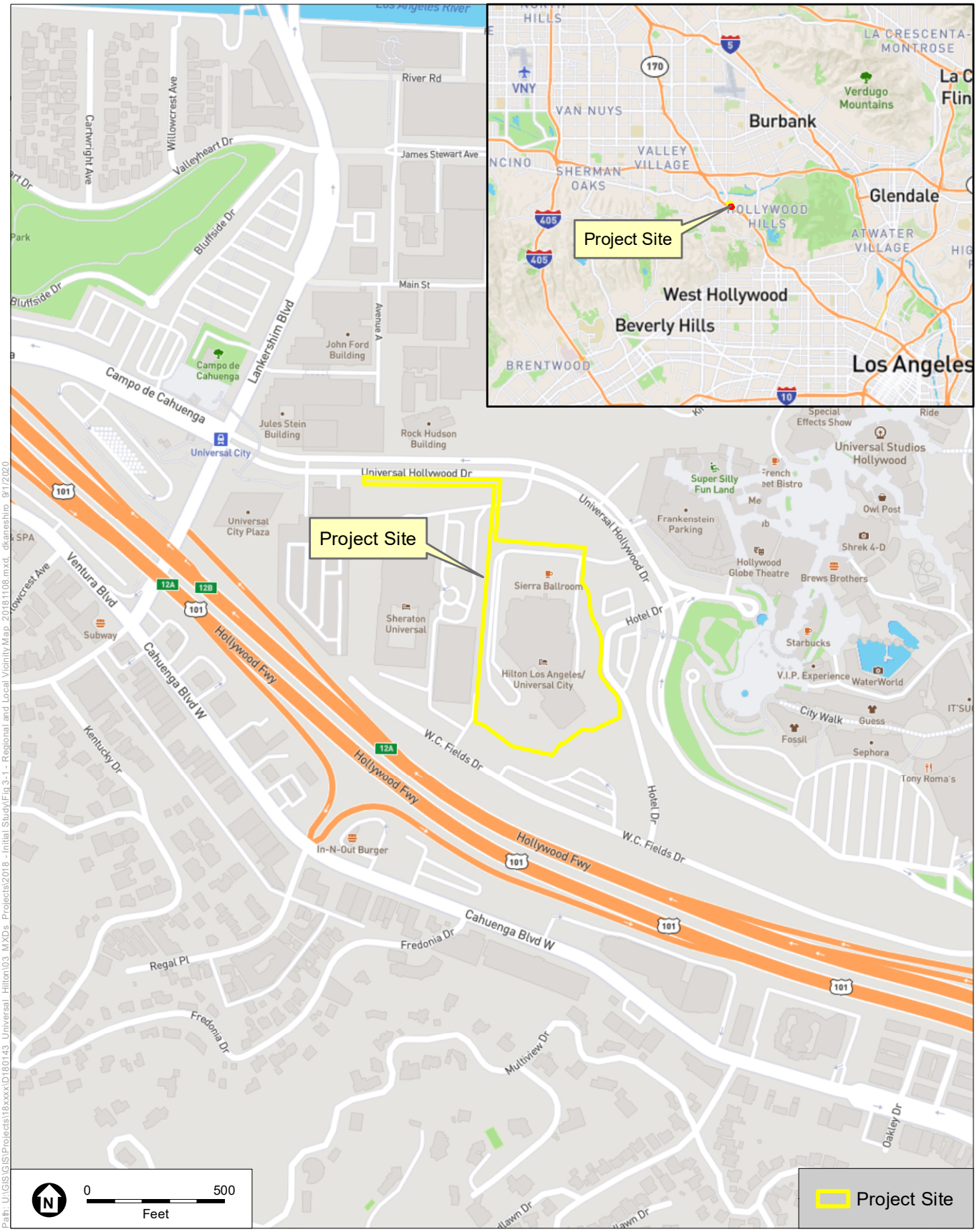
The Project would construct a new 20-story, 285,000-square-foot Hotel Expansion Building with 395 guest rooms, a new single-level lobby connecting to the Existing Hotel Building, restaurant and bar spaces, a spa, and new outdoor pool areas on the southern portion of the Project Site. The Project would also construct a one-story, 15,000-square-foot Junior Ballroom/Meeting Room Addition to the Ancillary Hotel Building on the northern portion of the Project Site and a three-level expansion of the existing subterranean parking garage. In addition, the Project would include a revised surface parking program, landscape and hardscape improvements throughout much of the Project Site, and a new Gate Entryway structure. To accommodate the proposed development, the Existing Outdoor Pool Area on the southern portion of the Project Site would be demolished, and the existing North and South Plazas would be reconfigured. A limited amount of interior renovations within the footprint of the Existing Hotel Building would also be required to create the lobby connection between the existing building and the new Hotel Expansion Building.

Overall, the Project would add approximately 300,000 square feet of additional floor area to the Project Site. The Project would provide a minimum of 408 new vehicle parking spaces to accommodate additional employees, hotel guests and restaurant/spa visitors. Upon completion of the Project, the Hilton Universal City Hotel would provide a maximum of 890 guestrooms and 697,521 square feet of total floor area, resulting in a floor area ratio (FAR) of approximately 2.2:1 for the Project Site.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The Project Site (APN 2424-044-022) is located at 555 Universal Hollywood Drive in Universal City, immediately north of US-101 (Hollywood Freeway) and west of the intersection of Universal Hollywood Drive and Hotel Drive, in the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan Area of the City of Los Angeles. Regional access to the Project Site is provided by the Hollywood Freeway via on- and off-ramps at Lankershim Boulevard (0.25 mile west of the Project Site) and Universal Studios Boulevard (0.4 mile east of the Project Site). Local access to the Project Site is provide via Lankershim Boulevard, W.C. Fields Drive (via Universal Studios Boulevard), Hotel Drive, and Universal Hollywood Drive. The Project Site is shown from a regional and local perspective in **Figure 3-1**, *Regional and Local Vicinity Map*. **Figure 3-2**, *Project Vicinity Map*, provides an aerial view of the Project Site and its surroundings.

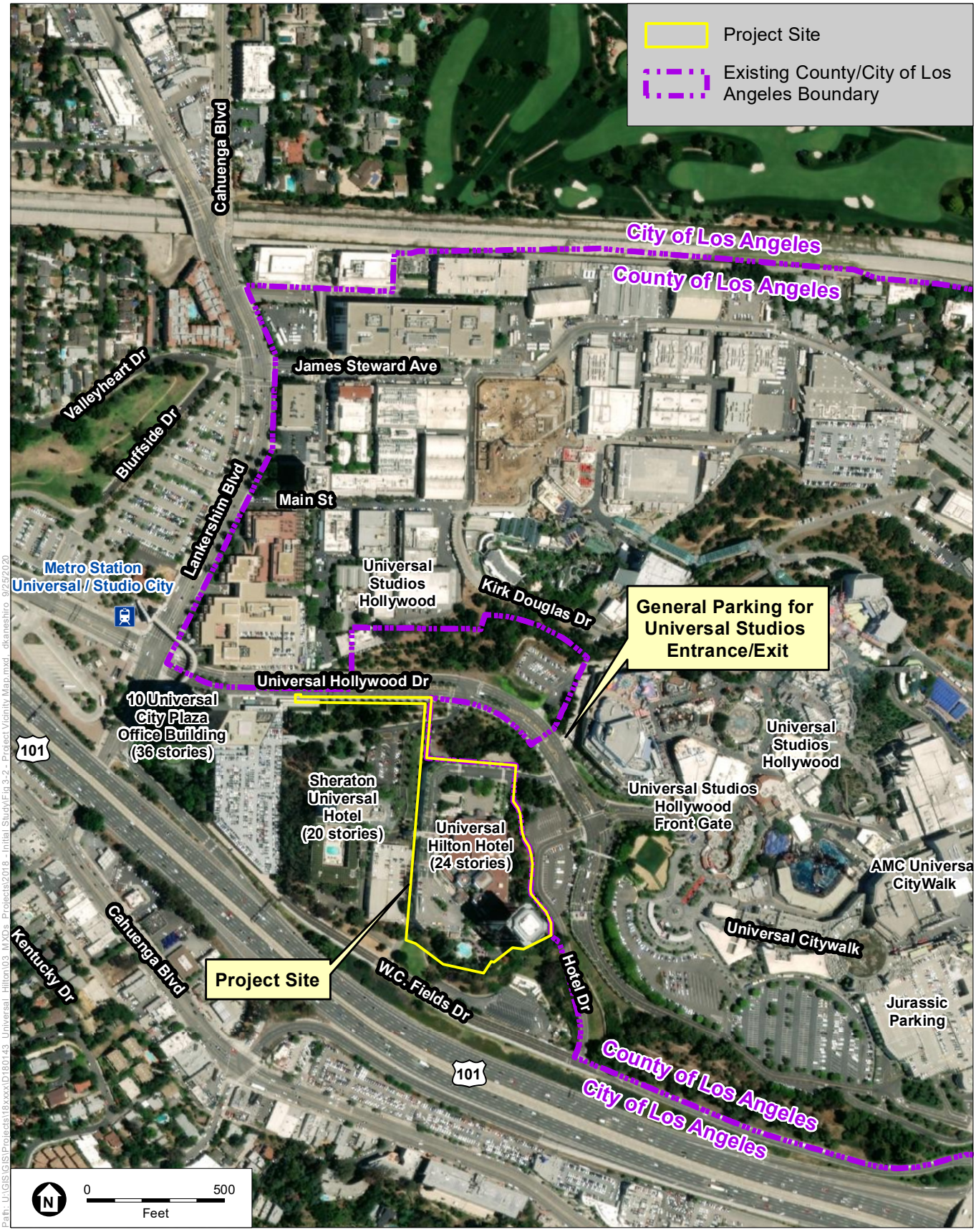


SOURCE: Open Street Map, 2018

Hilton Universal City Project

Figure 3-1

Regional and Local Vicinity Map



SOURCE: DigitalGlobe, 2016

Hilton Universal City Project

Figure 3-2
Project Vicinity Map

3.2.2 Existing Conditions

3.2.2.1 Site Background

The Existing Hotel Building was constructed in 1984, at which time the Project Site and adjacent properties containing the 20-story Sheraton Universal Hotel and 36-story 10 Universal City Plaza Office Building were part of a larger Universal Studios campus. The parcels were subdivided and sold independently between 1996 and 1997.

3.2.2.2 Existing Project Site Improvements

The Project Site is situated on a promontory (a point of high land) that descends moderately to the west, south, and east at a grade of approximately 50 percent (2:1 horizontal-to-vertical gradient). The top of the promontory is approximately 707 feet above mean sea level (msl) and the on-site low point is approximately 670 feet above msl, with an overall elevation change of approximately 37 feet across the Project Site.[2]

The Project Site is developed with the Existing Hotel Building and associated improvements. The primary on-site improvements (described from north-to-south) consist of: a) a motorcourt and porte cochere entryway to the Ancillary Hotel Building, and landscaping (collectively, the "North Plaza"); b) the low-rise Ancillary Hotel Building; c) a motorcourt with Americans with Disabilities Act (ADA) accessible parking spaces, landscaped median, and a porte cochere entryway to the Existing Hotel Building's lobby area (collectively, the "South Plaza"); d) the Existing Hotel Building; and e) the Existing Outdoor Pool Area. A summary of existing uses is provided in **Table 3-1**, *Existing On-Site Improvements*. (The locations of existing improvements on the Project Site are shown in **Figure 3-4,** *Conceptual Site Plan*, below.)

TABLE 3-1
EXISTING ON-SITE IMPROVEMENTS

Use	Size/Area
Project Site Area (sf/ac)	316,249 sf/ 7.26 ac
Existing Uses	
Hotel Rooms	495 rooms
Meeting/Banquet	26,030 sf
Restaurant / Lounge	5,050 sf
Pool Area (pool, spa, pool bar and grill, landscaped area)	8,819 sf
Retail/Sundry	924 sf
Lobby/Circulation	9,665 sf
Total Floor Area	397,521 sf
Total Vehicle Parking Spaces	652 spaces

Vehicle access to the Project Site is via a driveway on Universal Hollywood Drive that leads to an internal roadway along the north and west perimeter of the Project Site. This internal roadway

[2] Based on the North American Vertical Datum of 1988 (NAVD 88), which is the vertical datum for orthometric heights established for vertical control surveying in the United States based upon the General Adjustment of the North American Datum of 1988.

provides vehicle access to the North Plaza, the subterranean parking garage, and the South Plaza. The South Plaza porte cochere entryway provides primary pedestrian access to the Existing Hotel Building and also serves as the pick-up/drop-off area for the complimentary Universal Studios Hotel Shuttle.

The Ancillary Hotel Building is one- to two-stories in height and located south of the North Plaza. The Ancillary Hotel Building includes a lobby area, concierge/tour desk, gift/sundry shop, atrium areas, meeting/banquet rooms, the Café Sierra Restaurant, the Atrium Lounge, a lobby bar, and a small coffee shop. The Ancillary Hotel Building also includes internal corridors that connect to the 24-story Existing Hotel Building, which is located south of the Ancillary Hotel Building, northeast the Existing Hotel Pool Area, and east of the South Plaza. The Existing Hotel Building is approximately 258 feet in height, as measured from the South Plaza, and contains 495 existing guestrooms. The approximately 1,809-square-foot Existing Hotel Pool Area is the southernmost improvement on the Property, and consists of a pool, pool deck, spa, pool bar and grill, and ornamental landscaping.

The North Plaza, the Ancillary Hotel Building, internal roadway, and South Plaza are located above a three-level subterranean parking garage. Due to the natural slope of the Project Site, the parking garage is almost entirely subterranean toward the northeast portion of the Project Site, gradually daylighting to the west and south, becoming almost entirely above-ground toward the southwest corner of the Project Site. The three subterranean parking levels are accessible via a ramp extending from the west side of the North Plaza, just north of the Ancillary Hotel Building. Overall, the Project Site currently contains a total of 652 vehicle parking spaces. Ornamental landscaping is planted along the periphery of the aboveground portion of the parking garage to screen it from view.

3.2.2.3 Site Security

The Hotel presently implements a comprehensive security program, 24 hours per day, seven days per week, to ensure the safety of hotel guests and visitors. The hotel grounds provide well-lit public and semi-public spaces and active security features, including coverage and monitoring of key areas through closed circuit television (CCTV). Full-time security is provided through staff at the front desk and security patrols. Access to non-public areas of the hotel and guestrooms is controlled through the use of electronic key cards. Access to the subterranean parking levels is controlled by an electronic access gate and monitored by CCTV.

3.2.2.4 Sustainability Features

The Hotel operates with a commitment to green building design, conservation, recycling, and sustainability. The Hotel fully embraces the sustainability culture of the Hilton brand, the Leadership in Energy and Environmental Design (LEED) requirements, as well as the Los Angeles Green Lodging Program community commitments. As part of the Property Assessment Clean Energy (PACE) initiative which encourages implementation of energy-efficient upgrades and features, the following features have been implemented at the Hotel:

- Replaced all 14 elevators with energy rated improvements (high rise makes energy on decent);
- Installed solar art windows on 100% of building;
- Replaced 2,450-ton energy efficient chillers with variable speed drives;
- Retrofitted 12,000 light bulbs with LED;

- Replaced all heating/cooling units to include energy efficient fan motors;
- Implemented water conservation features: installed water saving plumbing fixtures, shower heads, and replaced laundry equipment with total savings over 1 million gallons annually saved; and
- Initiated a recycle program for all disposable products from rooms: soap, shampoo, kitchen glass and plastic with savings of over 80 tons on waste to landfills annually.

3.2.2.5 General Plan and Zoning

3.2.2.5.1 Los Angeles General Plan

The Project Site is located within the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan Area, one of the City's 35 community plans that collectively comprise the Land Use Element of the Los Angeles General Plan (General Plan). Per the City's Zimas website, the Project Site has a land use designation of Regional Center Commercial.[3] Regional Centers are defined as a focal point of regional commerce, identity and activity and containing a diversity of uses such as corporate and professional offices, residential, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities and supporting services. The Regional Center Commercial land use designation has corresponding zoning designations of Commercial (CR, C1.5, C2, and C4) and Multi-Family Residential (RAS3, RAS4, R3, R4, and R5). Although the Project Site is not located within a specific plan, the nearby unincorporated Los Angeles County area to the north and east is part of the County's Universal Studios Specific Plan area, which includes four districts: Business District, Studio District, Back Lot District and the Entertainment District. The Entertainment District is located to the north and east of the Project Site. The Entertainment District contains Universal Studios Hollywood, an admission based entertainment venue/theme park, and Universal CityWalk, an entertainment venue and entertainment retail venue with retail, restaurant, and theater uses. The Business District is located northwest of the Project Site on the north side of Universal Hollywood Drive and east of Lankershim Boulevard.

3.2.2.5.2 Zoning

The Project Site has three zoning designations as shown in **Figure 3-3**, *Zoning of Project Site and Surrounding Area*. The central portion of the Project Site, where the Existing Hotel Building and Ancillary Hotel Building are located, is zoned C2-1 (Commercial Zone, Height District 1). The C2 Zone permits a range of commercial uses, including hotels and apartment hotels. Within Height District 1, the C2 Zone allows unlimited building heights and establishes a maximum FAR of 1.5:1. The portion of the Project Site peripheral to these buildings is assigned a zoning designation of PB-1 (Parking Building, Height District 1). The PB Zone permits structured automobile parking, including structures which are attached to or integrated with buildings in other zones provided that certain provisions are met. Within Height District 1, the PB Zone permits a maximum of two stories but does not specify a maximum height. A small trapezoidal area that forms the southern portion of the Project Site, (specifically the

[3] Zimas website available at http://zimas.lacity.org/, accessed August 7, 2020. The Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan Area Land Use Map (as of February 5, 2013) recognizes two land uses for the Project Site: 1) Regional Center (pre-FW or pre-Framework Element) and within Height District No. 2 (per footnote 5); and 2) Regional Commercial. According to the City's Zimas website, the Project Site is designated for Regional Center Commercial use, which is used by the City to determine the Project Site's current land use designation and as such, is utilized herein.

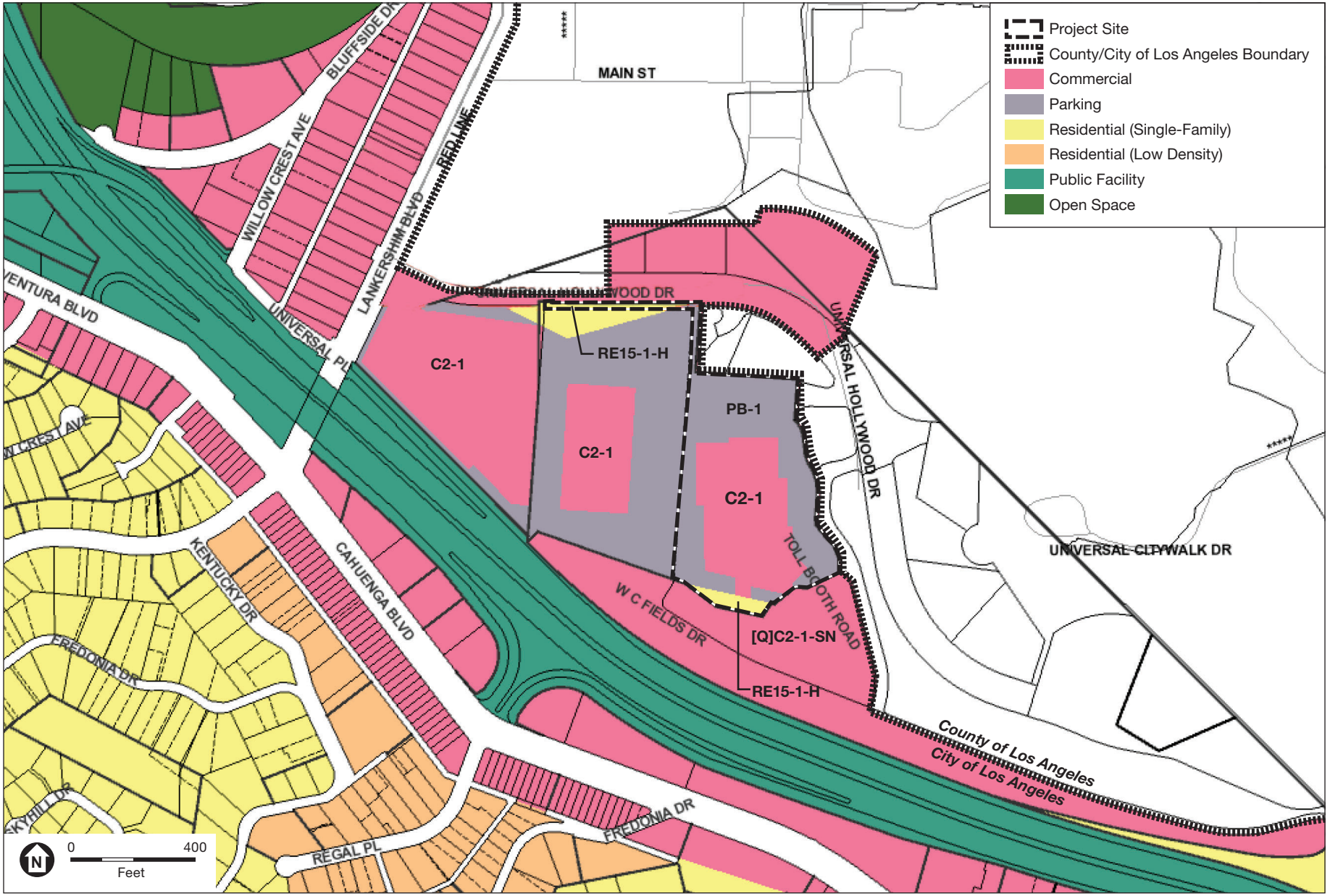
landscaped engineered hillside) is zoned RE15-1-H (Residential Estate Zones, Height District 1, Hillside Area). The RE15 Zone is primarily intended for the development of single-family homes and parks/playgrounds with a minimum lot area of 15,000 square feet. Within Height District 1, the RE15 restricts development to a maximum height of 36 feet and a maximum FAR of 3.0:1.

3.2.3 Surrounding Land Uses

The Project Site is bordered on the north by an undeveloped parcel, entertainment and production-related uses associated with Universal Studios Hollywood and Universal Hollywood Drive; on the east by a surface parking lot operated by Universal Studios Hollywood, Hotel Drive, an undeveloped hillside parcel, and Universal Studios Hollywood; on the south by an undeveloped parcel and a shuttle parking lot (both owned and maintained by Universal Studios Hollywood); and to the west by the Sheraton Universal Hotel. The Sheraton Universal Hotel consists of a 20-story hotel building at the center of the property, with hotel-related uses surrounding the building, including a three-level parking structure located adjacent to the Project Site. W.C. Fields Drive is located approximately 130 feet south of the Project Site and provides vehicle access to the Project Site via Hotel Drive and Universal Hollywood Drive as an alternate arrival and exit. A landscaped roadway shoulder and the travel lanes of the Hollywood Freeway are located south of W.C. Fields Drive, approximately 200 feet south/southwest of the Project Site. South of the Hollywood Freeway is the Cahuenga Boulevard corridor, which consists of one- to three-story commercial uses. Further south, land uses consist of the single-family residential homes of the Cahuenga Pass foothills. Figure 3-2, above, provides an aerial view of the Project Site surroundings.

The Existing Hotel Building is one of three high-rise buildings located between the Hollywood Freeway and Universal Hollywood Drive, east of Lankershim Boulevard. The other two high-rise buildings are the 20-story Sheraton Universal Hotel, located immediately west of the Project Site, and the 36-story 10 Universal City Plaza Office Building, located west of the Sheraton Universal Hotel at the northeast corner of Lankershim Boulevard and the Hollywood Freeway. Each of the three high-rise buildings is supported by two- to six-level parking structures.

The Project vicinity is highly urbanized and generally built out. The Project Site is located in an active area that serves as both a commercial center for Studio City and the surrounding communities, and as an entertainment center of regional importance. The Hilton Universal City Hotel is the closest hotel to Universal Studios Hollywood and Universal CityWalk, both of which are located across Universal Hollywood Drive from the Project Site. Both entertainment venues are part of the larger Universal City, which consists of a number of interrelated entities that have evolved because of their association with the entertainment industry, including Universal Studios Hollywood, Universal CityWalk, and the facilities that comprise Universal Studios, with soundstages, backlot sets, and offices largely occupied by entertainment and production-related companies. The majority of Universal City is located within unincorporated Los Angeles County, generally located just north and east of the Project Site, which is also generally north and east of Universal Hollywood Drive.



D180143.00

SOURCE: ZIMAS, 2020

Hilton Universal City Project

Figure 3-3
Zoning of Project Site and Surrounding Area

ESA

The front admissions gate (Front Gate) to Universal Studios Hollywood is located approximately 650 feet east of the Project Site at its closest point adjacent to Hotel Drive, with pedestrian access provided between the Project Site and the Front Gate via sidewalks and pedestrian crosswalks at the intersection of Universal Hollywood Drive and Hotel Drive. Universal Hollywood Drive also serves as one of the primary vehicle access to parking facilities for Universal Studios Hollywood and Universal CityWalk, with public travel lanes terminating at the West Gate admission booths on Universal Hollywood Drive approximately 530 feet south of the driveway to the Project Site. General Parking (the Frankenstein Parking Garage) for Universal Studios Hollywood is also located across Universal Hollywood Drive from the Project Site's driveway. Universal Studios operates a complementary shuttle for hotel guests/visitors to Universal Studios Hollywood and Universal CityWalk on a 15 to 20-minute cycle to and from both the Sheraton Universal Hotel and Hilton Universal City Hotel as a courtesy for park attendees staying at the hotels.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Project would improve and expand the Existing Hotel Building with the addition of the Hotel Expansion Building just south of the Existing Hotel Building within the southern portion of the Project Site. The Hotel Expansion Building would include up to 395 total guest rooms; a new single-level lobby on Level 3 that would serve as a new entrance for both the Existing Hotel Building and the Hotel Expansion Building; restaurant and interior/exterior bar spaces, a spa, and new outdoor pool areas. The Project would also expand the north portion of the Ancillary Hotel Building to include the one-story Junior Ballroom/Meeting Room Addition which would consist of a 5,000-square-foot Junior Ballroom and up to 10,000 square feet of meeting rooms.

Figure 3-4, *Conceptual Site Plan*, provides an illustration of the conceptual site plan for the Project. As shown on Figure 3-2, the Project Site includes a narrow "L-shaped" strip of land that extends from the northwest corner of the North Plaza. This area extends approximately 200 feet to the north from the northwest corner of the North Plaza and then turns west extending approximately 325 feet. No Project-related improvements would occur within this L-shaped strip of land. As such, this portion of the Project Site is included in figures only as relevant since no improvements will occur in this area.

Representative floor plans (from lowest to highest levels) for the Project, including plans for the Hotel Expansion Building in the southern portion of the Project Site, as well as for the northern portion of the Project Site (generally showing improvements as part of and near the Junior Ballroom/Meeting Room Addition) are shown in: **Figure 3-5,** *Level B3 (South) - Hotel Expansion Building;* **Figure 3-6**, *Level B2 (South) - Hotel Expansion Building ;* **Figure 3-7**, *Level B2 (North);* **Figure 3-8**, *Level B1 (South) - Hotel Expansion Building;* **Figure 3-9**, *Level B1 (North)*; **Figure 3-10**, *Level 1 (South) - Hotel Expansion Building;* **Figure 3-11**, *Level 1 (North);* **Figure 3-12**, *Level 2 (South) - Hotel Expansion Building;* **Figure 3-13**, *Level 3 (South) - Hotel Expansion Building;* **Figure 3-14**, *Level 3 (North) - Junior Ballroom/Meeting Room Addition;* **Figure 3-15**, *Level 4-16 Typical Layout (South) - Hotel Expansion Building;* **Figure 3-16**, *Level 17 (South) - Hotel Expansion Building.*

SOURCE: Large Architecture, 2020

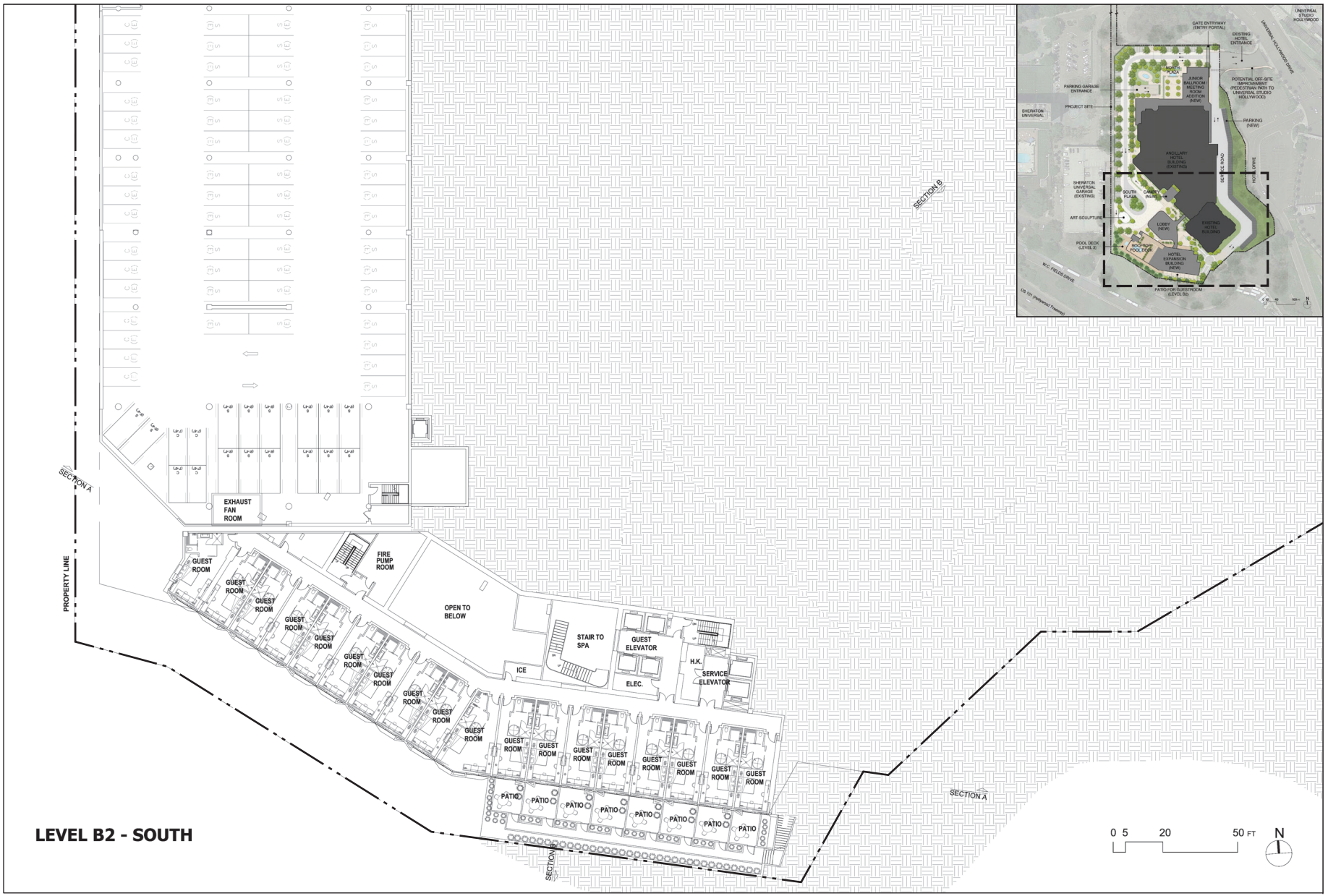
Hilton Universal City Project

Figure 3-4
Conceptual Site Plan

SOURCE: Large Architecture, 2020

Hilton Universal City Project

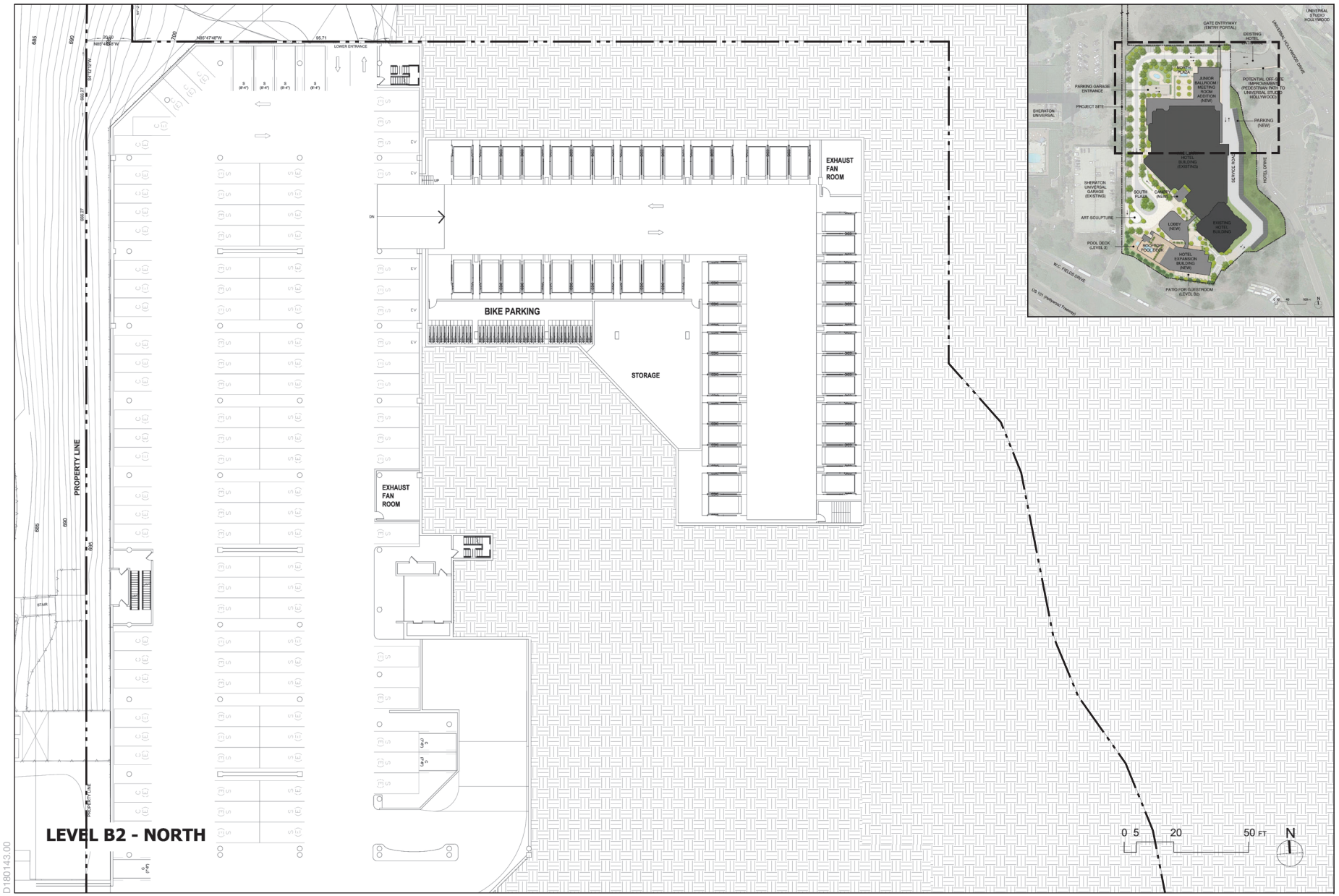
Figure 3-5
Level B3 (South) – Hotel Expansion Building



SOURCE: Large Architecture, 2020

Hilton Universal City Project

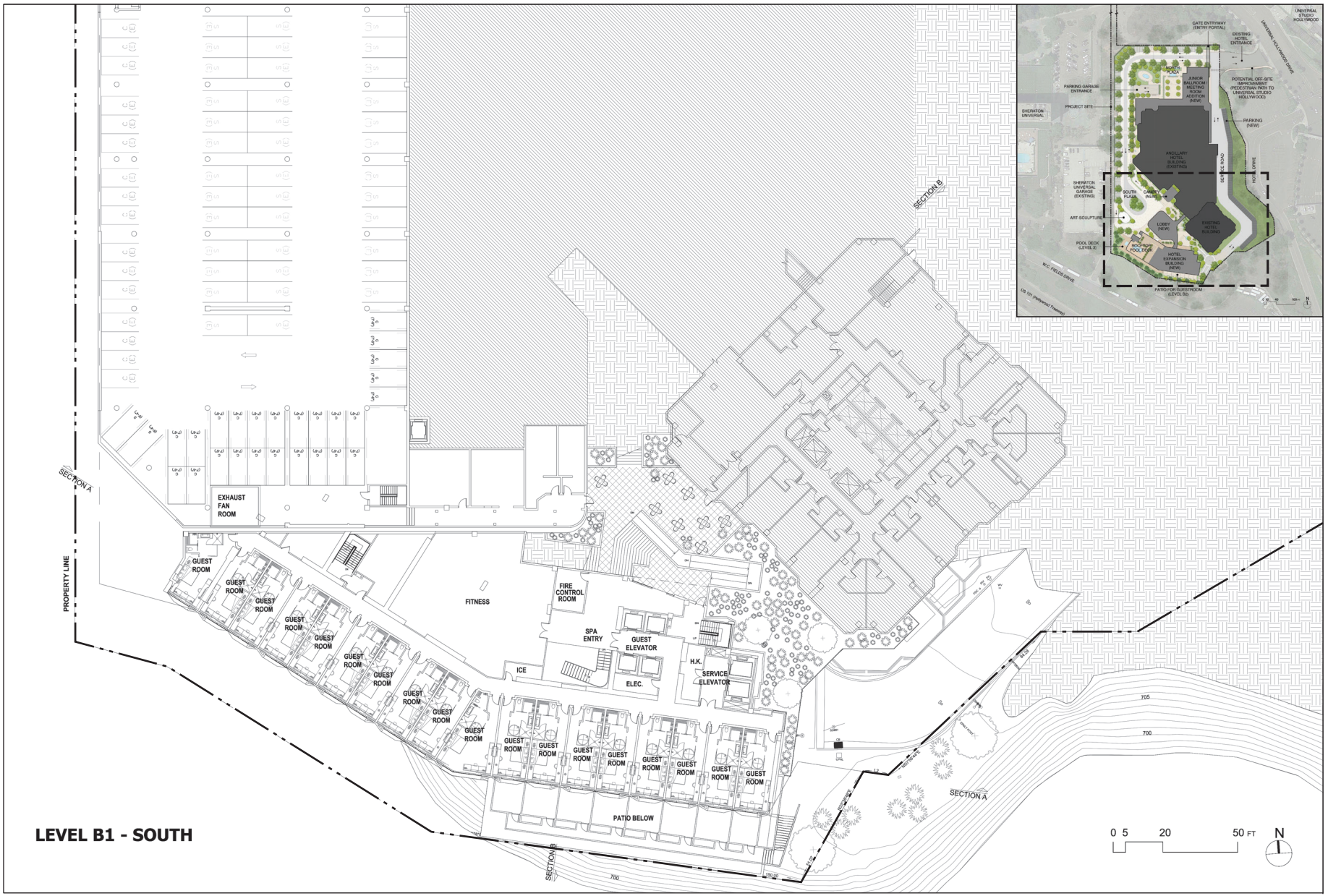
Figure 3-6
Level B2 (South) – Hotel Expansion Building



SOURCE: Large Architecture, 2020

Hilton Universal City Project

Figure 3-7
Level B2 (North)



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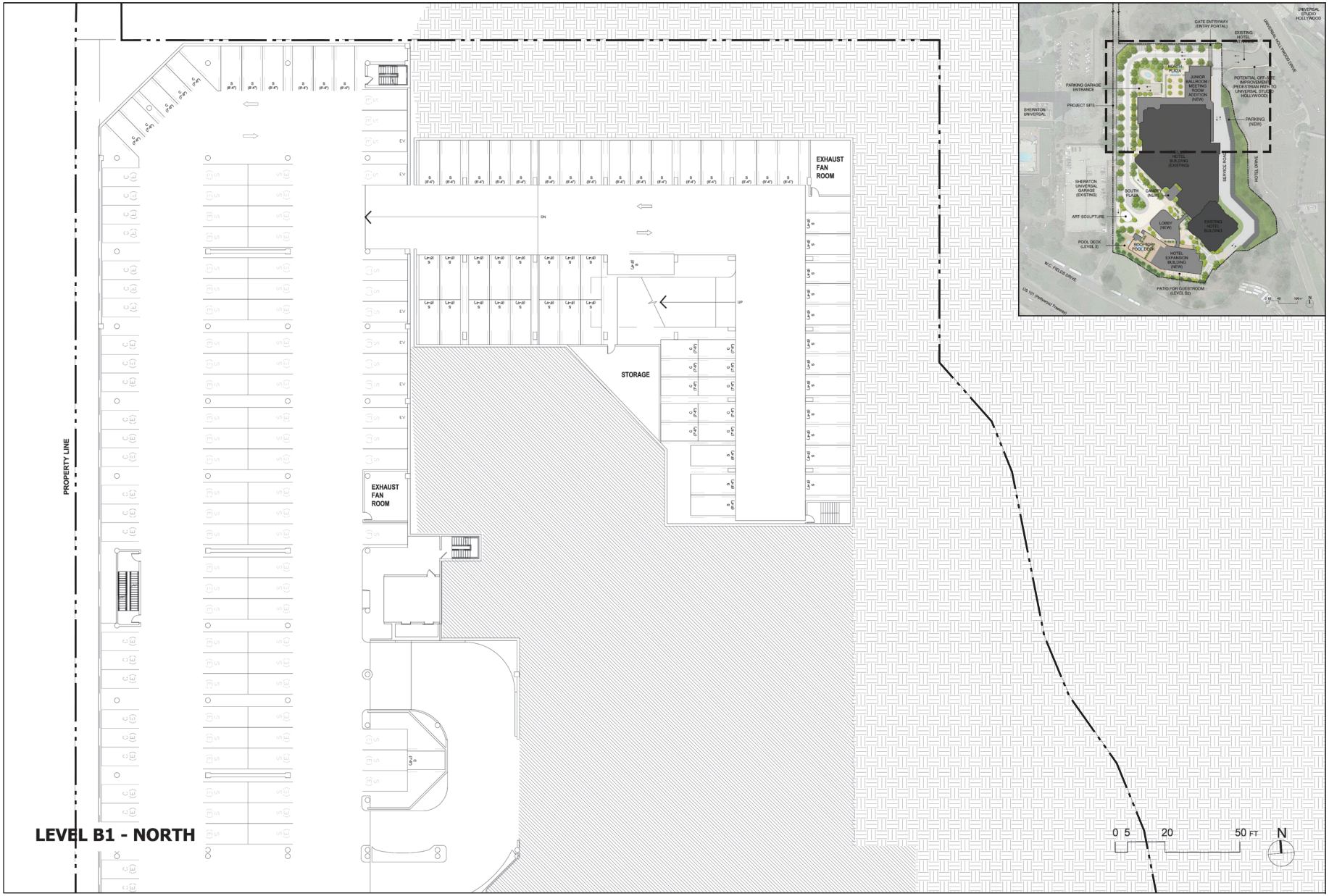
SOURCE: Large Architecture, 2020

Hilton Universal City Project

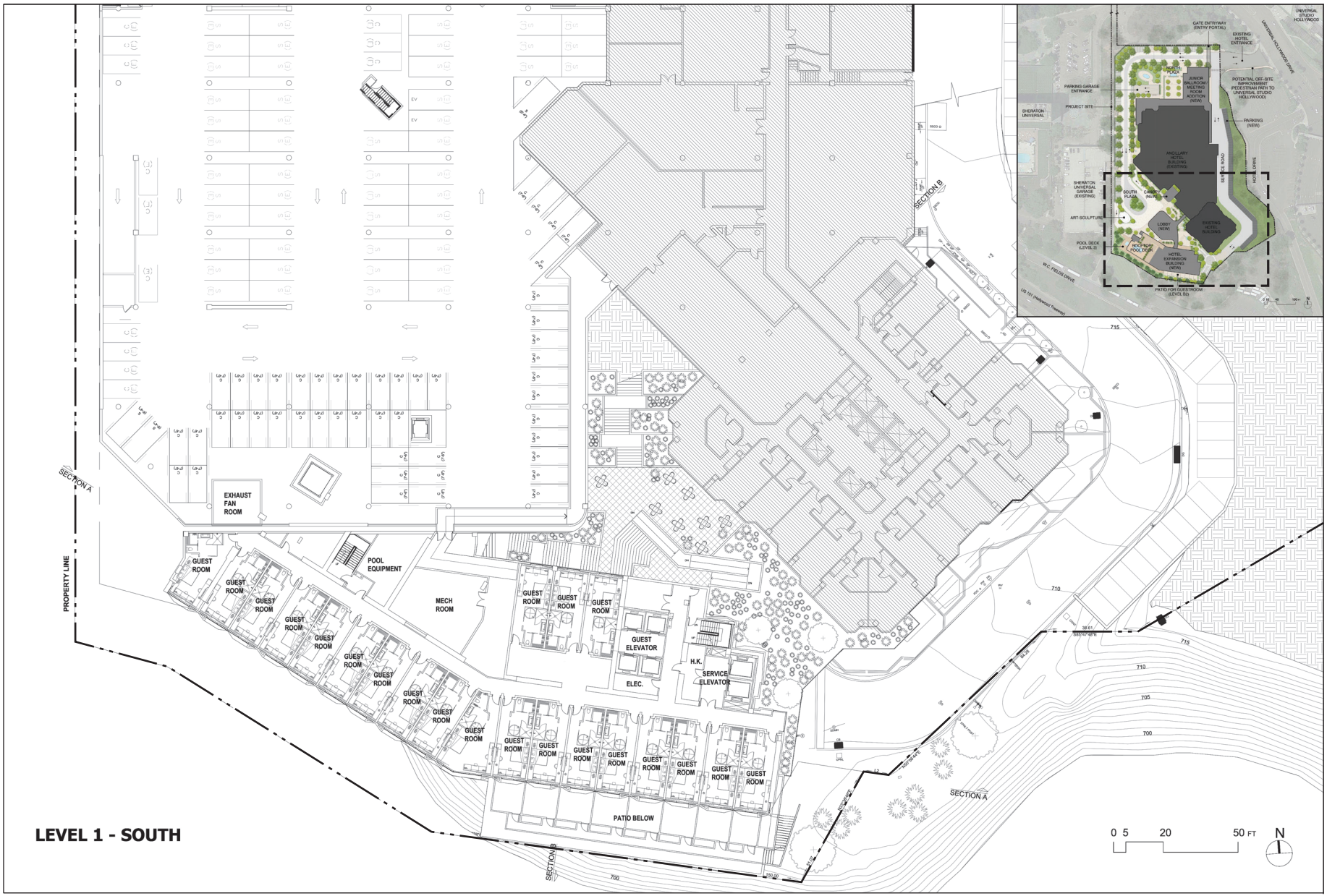
Figure 3-8
Level B1 (South) – Hotel Expansion Building



SOURCE: Large Architecture, 2020

Hilton Universal City Project

Figure 3-9
Level B1 (North)

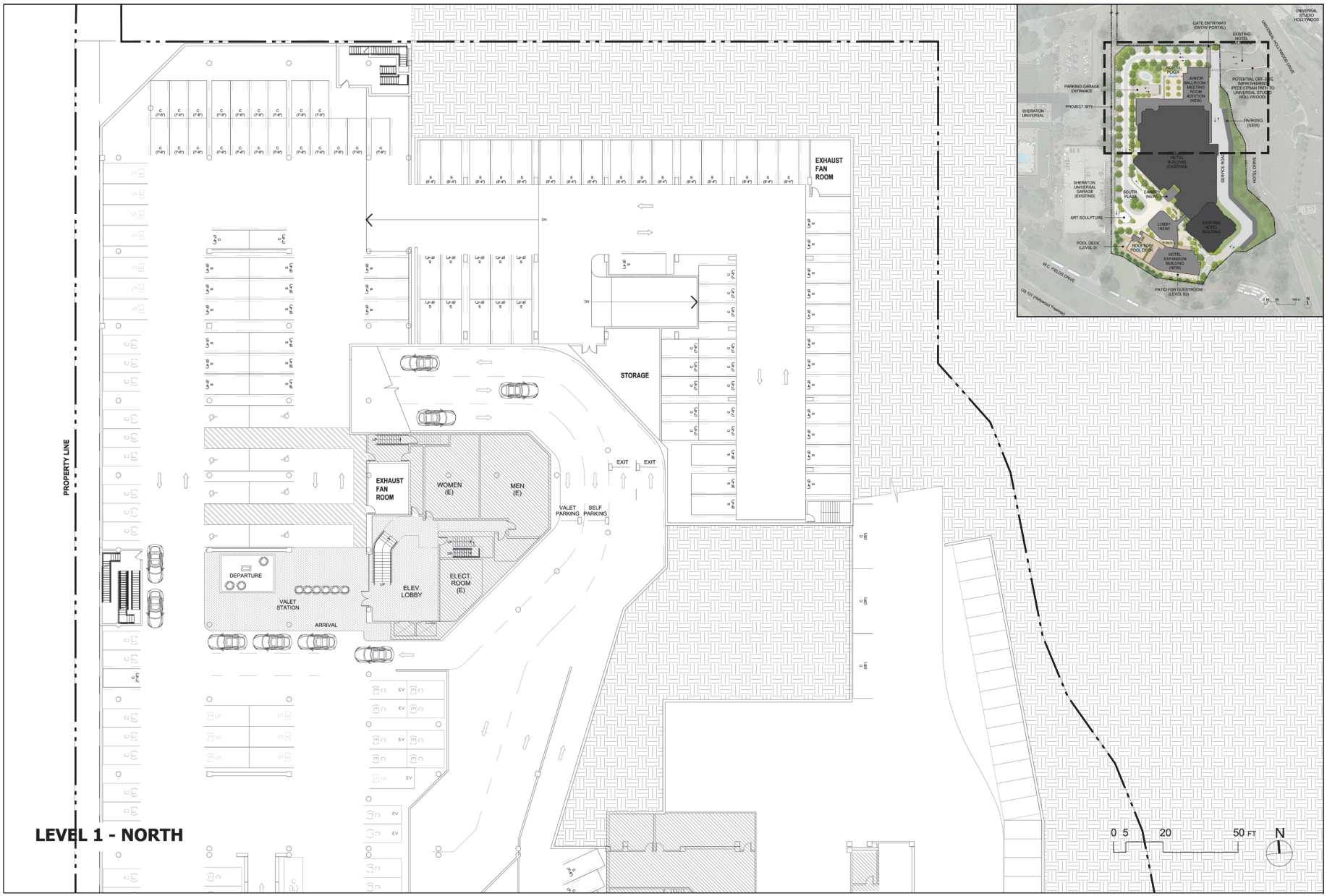


D180143.00

SOURCE: Large Architecture, 2020

Hilton Universal City Project

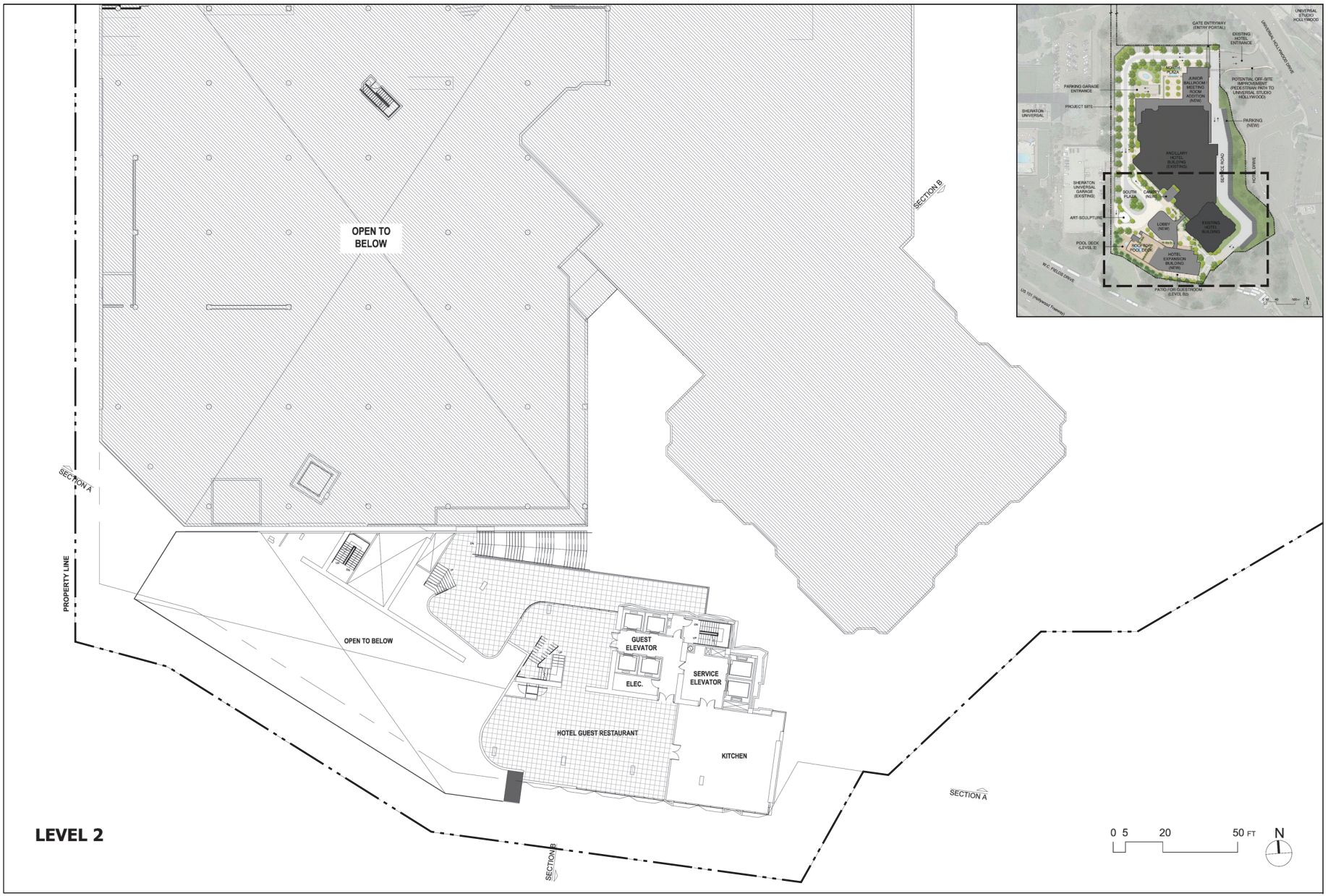
Figure 3-10
Level 1 (South) – Hotel Expansion Building



SOURCE: Large Architecture, 2020

Hilton Universal City Project

Figure 3-11
Level 1 (North)

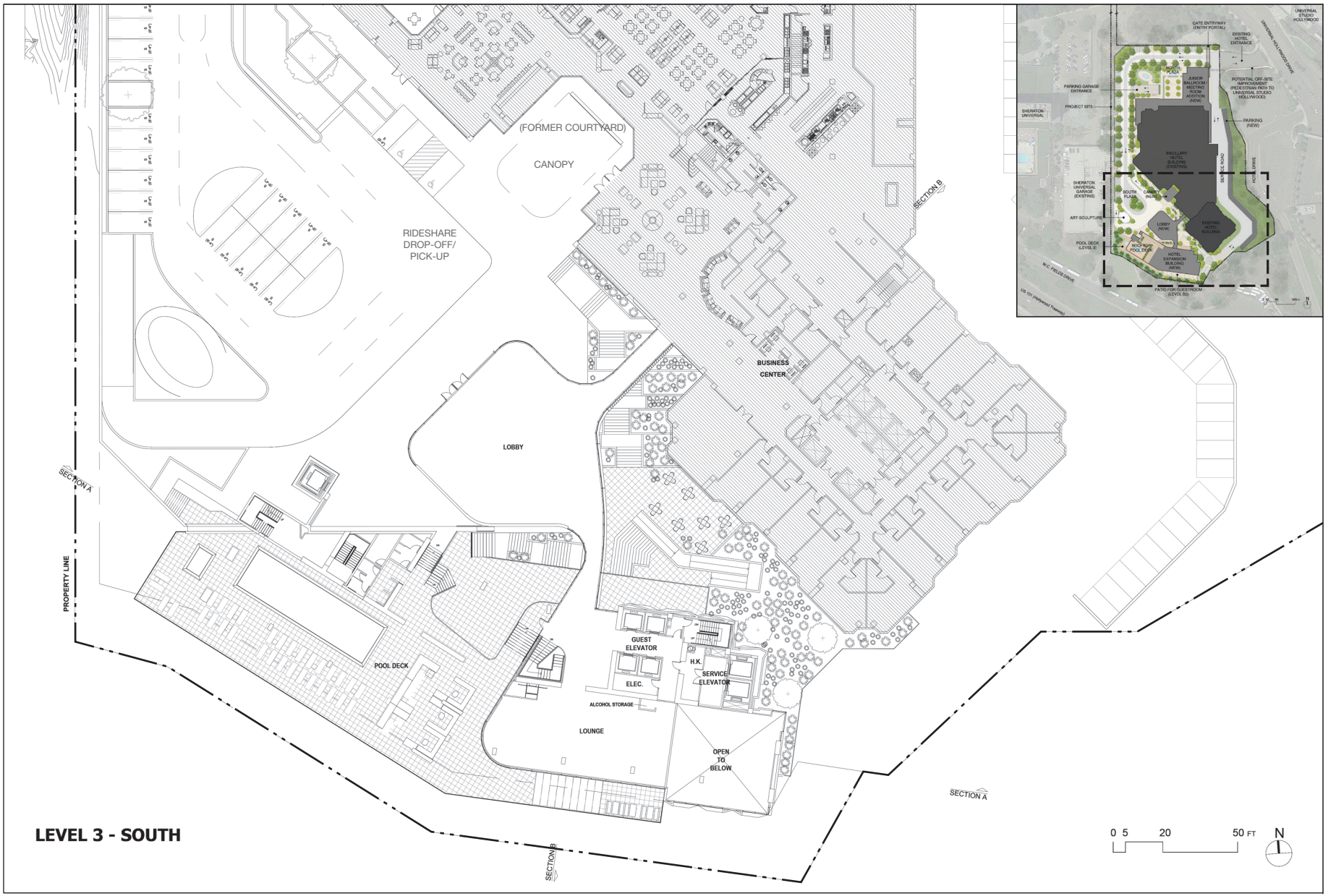


SOURCE: Large Architecture, 2020

Hilton Universal City Project

Figure 3-12
Level 2 (South) – Hotel Expansion Building

(former courtyard)

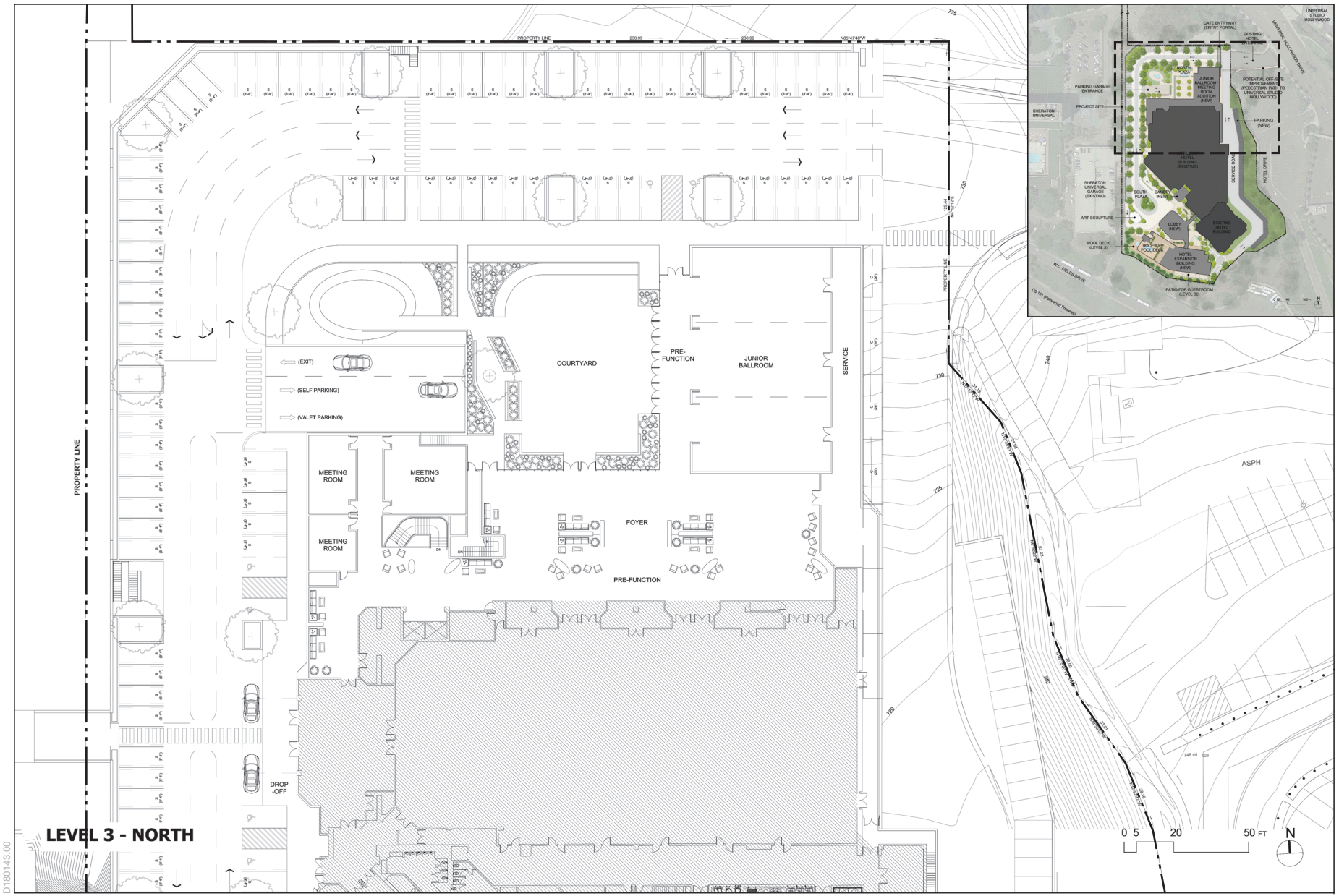


D180143.00

SOURCE: Large Architecture, 2020

Hilton Universal City Project

Figure 3-13
Level 3 (South) – Hotel Expansion Building



SOURCE: Large Architecture, 2020

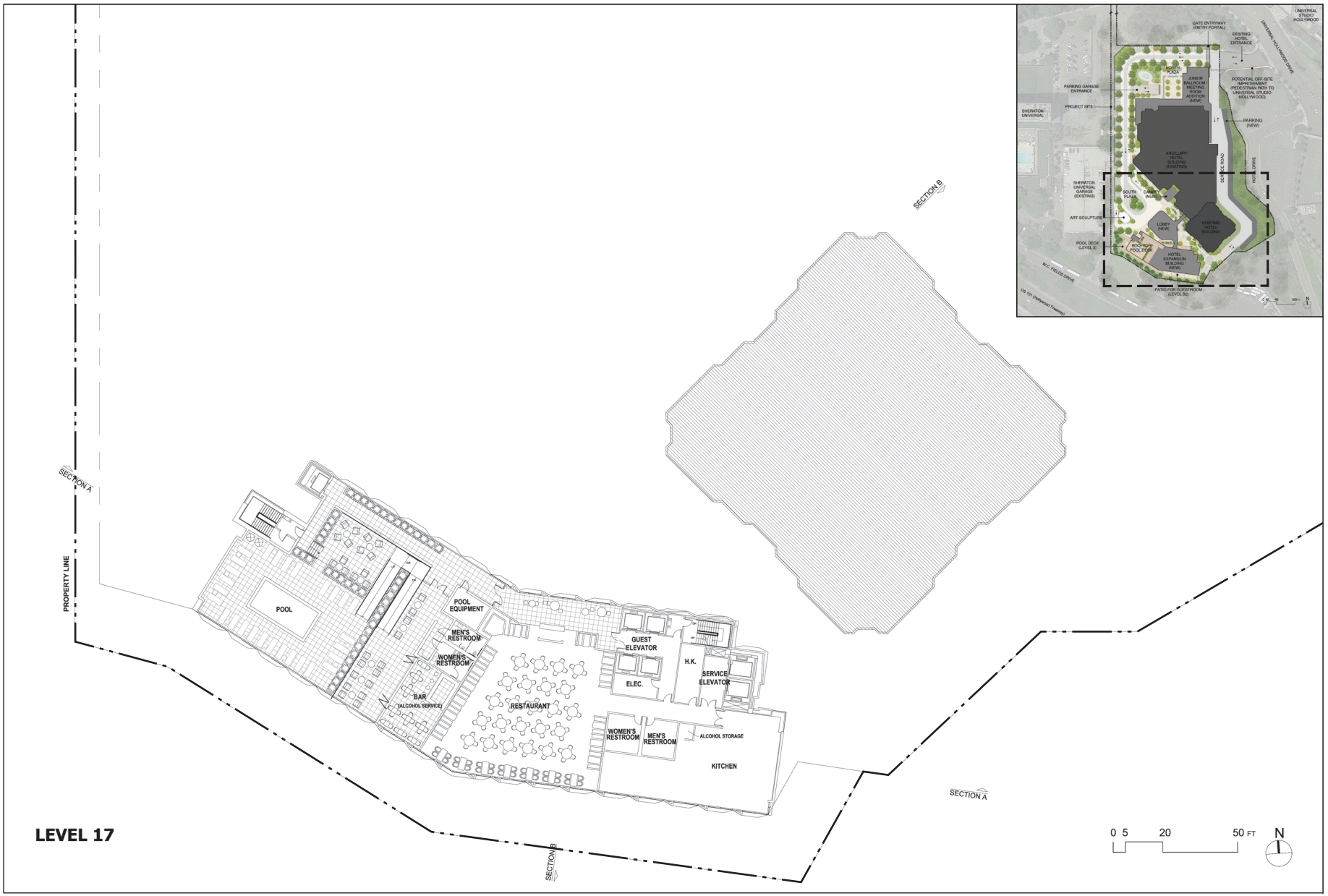
Hilton Universal City Project

Figure 3-14
Level 3 (North) – Junior Ballroom/Meeting Room Addition

SOURCE: Large Architecture, 2020

Hilton Universal City Project

Figure 3-15
Level 4-16 Typical Layout (South) – Hotel Expansion Building



D180143.00

SOURCE: Large Architecture, 2020

Hilton Universal City Project

Figure 3-16
Level 17 (South) – Hotel Expansion Building

Overall, the Project would add approximately 300,000 square feet of floor area to the Project Site. When added to the existing uses, which include approximately 397,521 square feet of floor area, implementation of the Project would result in a maximum of 890 guestrooms, 697,521 square feet of floor area, and a resulting FAR of approximately 2.2:1 for the Project Site.

The proposed development program is summarized in **Table 3-2**, *Development Program Summary*. Individual Project components are described below.

TABLE 3-2
DEVELOPMENT PROGRAM SUMMARY

Use	Size/Area[a]
Project Site	316,249 sf or 7.26 ac
Hotel Expansion Building	
395 Guestrooms and support spaces	263,000 sf
Restaurant and Bar (Level 17)	6,500 sf
Restaurant (Level 2)	5,500 sf
Spa (Level B3)	10,000 sf
Ancillary Hotel Building Expansion	
Meeting Rooms	10,000 sf
Junior Ballroom	5,000 sf
Total New Floor Area (Project)	**300,000 sf**
Existing Project Site Floor Area	397,521 sf
Existing Plus Project Floor Area	697,521 sf
Floor-to-Area Ratio (FAR) for Project Site	2.2:1
New Parking Spaces	408

Notes:

[a] Area for the Hotel Expansion Building shown as floor area for purposes of calculating FAR per LAMC.

3.3.1.1 Modifications to Existing Buildings and New Lobby/Entry Features

As shown in Figure 3-13, the single-level portion of the Hotel Expansion Building would include an entry lobby on Level 3 which would serve as the new main lobby/entrance to both hotel buildings. The lobby would include the front desk for hotel check in/check out, a concierge desk, the bell man's desk with luggage storage, a lounge/seating area, and a small retail space intended to serve hotel guests and not be a destination retail space. From the lobby, guests would have access to both towers and the existing restaurant/bar within the Ancillary Hotel Building. The existing Hotel entrance, consisting of the electronic sliding doors, concrete walls/panels with signage around doors, and glass canopy, in the South Plaza would be removed to provide open access to the existing courtyard where guests could enter still into the Ancillary Hotel Building via doors off the former courtyard (see Figure 3-13). In effect, the courtyard would become outdoor open space as it would no longer be enclosed by the Ancillary Hotel Building façade, although a canopy roof projection would be added to provide cover over this space. The existing banquet

entrance at west façade of Ancillary Hotel Building would become a rideshare (i.e., (Uber/Lyft) drop-off.

3.3.1.2 Hotel Rooms

The Hotel Expansion Building's 395 total maximum guest rooms would be located on Levels B2, B1, 1, 2 and 4 through Level 16 (a total of 17 floors). The room types and sizes would include the standard approximately 450 feet guest room, the 900-square-foot suite and, the up to 2,500-square-foot presidential suite.

3.3.1.3 Restaurant/Bar

As shown in Figure 3-12, a restaurant for hotel guests would be located on Level 2 of the Hotel Expansion Building and would provide approximately 5,500 square feet of dining area. In addition, as shown in Figure 3-16, Level 17 of the Hotel Expansion Building would feature a high-quality restaurant with an indoor dining area of up to 5,000 square feet and an indoor/outdoor bar with a seating area of approximately 1,500 square feet. The restaurant and bar would be accessed through a dedicated elevator in the Hotel Expansion Building. The restaurant and bar would provide a full-line of alcohol service for on-site consumption during the hours of operation.

3.3.1.4 Junior Ballroom/Meeting Rooms

As shown in Figure 3-14, the Junior Ballroom/Meeting Room Addition on the north side of the Ancillary Hotel Building would include a 5,000-square-foot Junior Ballroom and small meeting rooms no larger than 750 square feet each, totaling up to 10,000 square feet. The meeting room space would be made available for groups already utilizing the Hotel. In addition, a new courtyard would be constructed adjacent to the Junior Ballroom/Meeting Room Addition that would be used as a pre-function space for the Junior Ballroom.

3.3.1.5 Recreational Amenities

A 10,000 square-foot spa would be located on Level B3 of the Hotel Expansion Building (see Figure 3-5). The spa would be open to hotel guests and up to 250 non-hotel guest private members. Of the 10,000 square feet, 6,800 square feet would be available for public use, while 3,200 square feet would be available for hotel guests only. The Hotel Expansion Building would also provide an approximately 2,600 square-foot fitness center on Level B1 for use by hotel guests (see Figure 3-8). As shown in Figure 3-13, an approximately 9,000-square-foot private pool deck with an approximately 1,000-square-foot pool, an approximately 100-square-foot jacuzzi, and outdoor seating would be located on Level 3. In addition, as shown in Figure 3-16, Level 17 of the Hotel Expansion Building would also include a 3,500-square-foot rooftop pool deck with an approximately 300-square-foot pool and outdoor seating for use by hotel guests and members of the spa.

3.3.1.6 Elevations and Sections

The Hotel Expansion Building would include 20 levels and have a maximum height of approximately 890 feet above mean sea level at its rooftop point, resulting in a maximum height of approximately 230 feet above grade to the top of the building. Generally, the Hotel Expansion Building would have three levels below grade and 17 levels above grade. At the proposed height, the Hotel Expansion Building would be seven-stories shorter than the 24-story Existing Hotel Building. Elevations of the Hotel Expansion Building are provided in **Figure 3-17,** *South Elevation*

– *Hotel Expansion Building;* **Figure 3-18,** *North Elevation – Hotel Expansion Building;* **Figure 3- 19,** *East Elevation – Hotel Expansion Building;* and **Figure 3-20,** *West Elevation – Hotel Expansion Building*. **Figure 3-21**, *Section A - Hotel Expansion Building*, and **Figure 3-22**, *Section B - Hotel Expansion Building,* provide illustrative building section views of the Hotel Expansion Building.

The Junior Ballroom/Meeting Room Addition would be a one-story building with a maximum building height of 32 feet 6 inches to the top of the parapet. **Figure 3-23,** *North Elevation – Junior Ballroom*, shows the Junior Ballroom/Meeting Room Addition as viewed from the north. **Figure 3-24,** *East Elevation – Junior Ballroom*, shows the Junior Ballroom/Meeting Room Addition as viewed from the east. **Figure 3-25,** *West Elevation – Junior Ballroom*, shows the Junior Ballroom/Meeting Room Addition as viewed from the west.

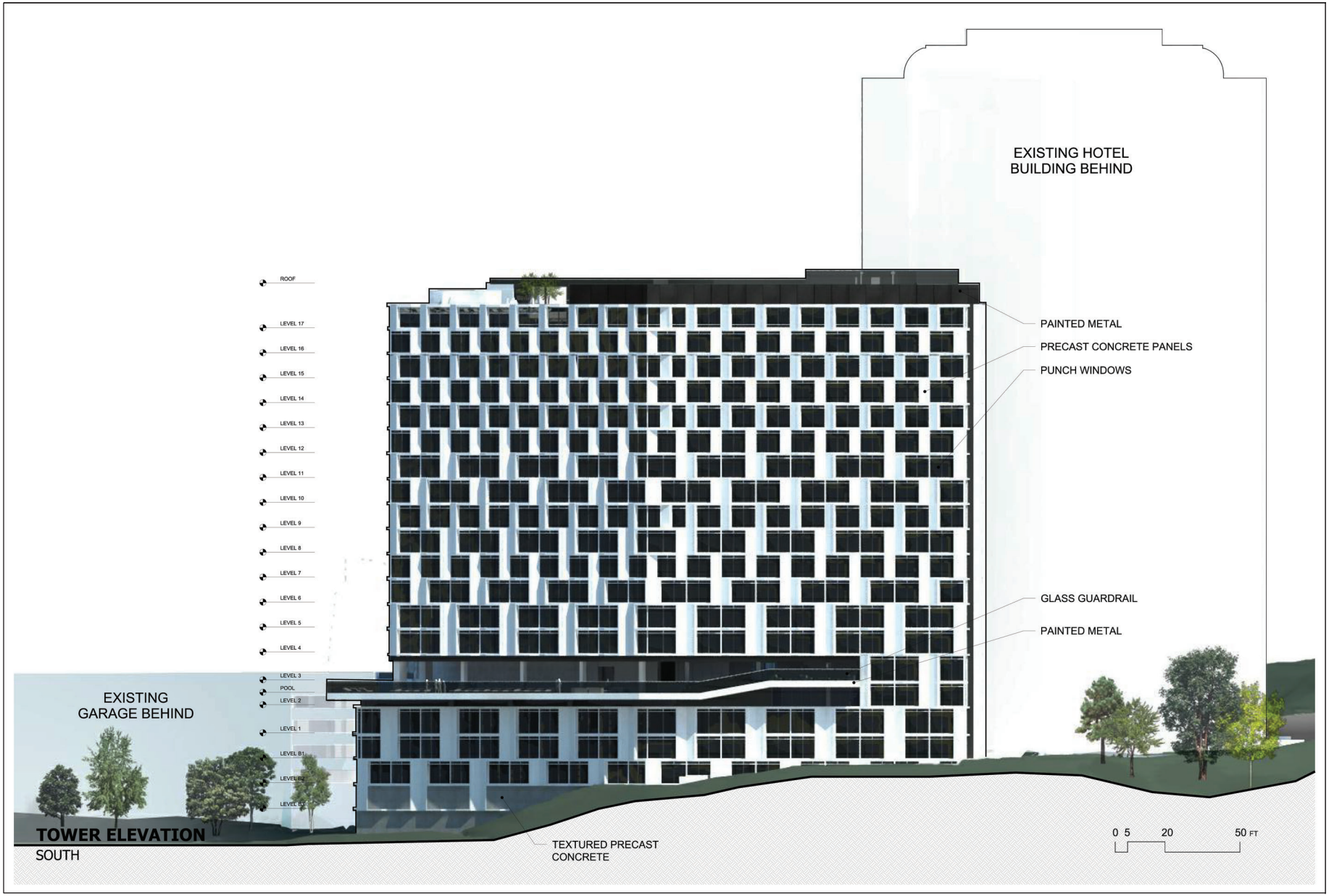
3.3.2 Design and Architecture

The Project would be designed with a modern, linear architecture that would complement the Existing Hotel Building and the Ancillary Hotel Building and creating a single hotel campus with two distinct buildings.

Figure 3-26, *Project Rendering – Northwesterly View*, and **Figure 3-27**, *Project Rendering – Northeasterly View*, provide renderings of the Hotel Expansion Building. The Hotel Expansion Building would be oriented in an approximate east-west direction with the broad side of the building (south elevation) facing the Hollywood Freeway. As shown in Figures 3-26 and 3-27, the Hotel Expansion Building would incorporate clear and tinted glass, architectural precast panels, painted metal panels, tile and exterior plaster. The rooftop would be articulated to define the restaurant space which would be enclosed by an operable glazing system that allows for indoor and outdoor dining. The new Level 3 central lobby shown in **Figure 3-28**, *Project Rendering – Southerly Interior Plaza View,* would connect the two buildings and create a central arrival and check in. The existing motorcourt at the South Plaza would also be upgraded with new paving and landscaping. A large sculptural art piece would also be located just west of new lobby in the South Plaza to function as the focal point for arrival and to provide screening for a cooling tower.

Figure 3-29, *Project Rendering – Southeasterly View* and **Figure 3-30,** *Project Rendering – Northerly Interior Plaza View*, show the Junior Ballroom/Meeting Room Addition. As seen in Figures 3-29 and 3-30, the Junior Ballroom/Meeting Room Addition would be constructed with pre-cast concrete panel, metal panels and stucco.

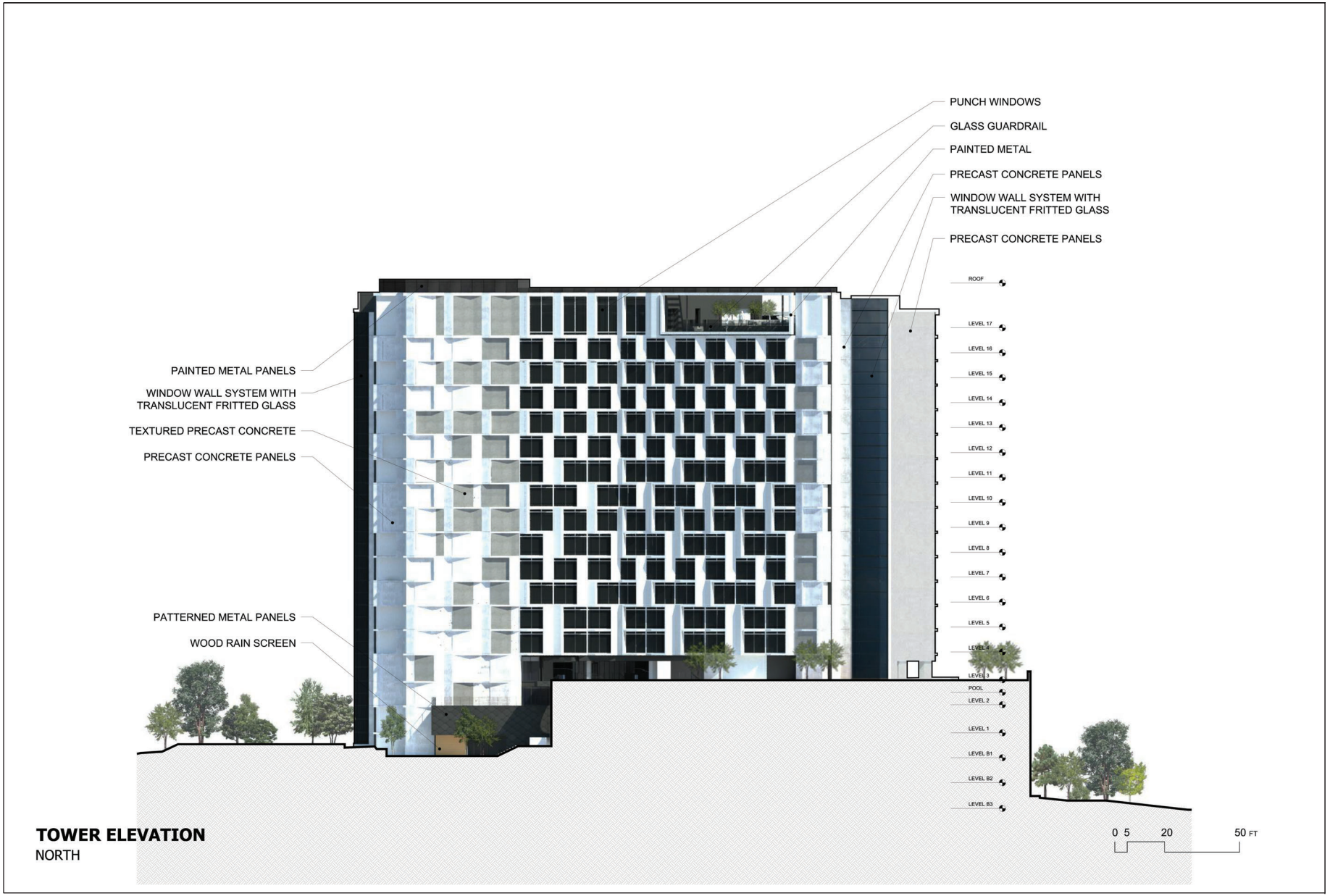
Figure 3-31, *Project Rendering – Westerly Driveway Entrance View*, shows the new signage that would be incorporated in the Gate Entryway adjacent to the Junior Ballroom/Meeting Room Addition. The Gate Entryway would be architecturally integrated with the new addition and would announce the entry to the Project Site. The internal roadway leading to the South Plaza would be paved with topcast finish concrete paving and the parking spaces along the internal roadway would feature grasscrete integrated with drivable turf.



SOURCE: Large Architecture, 2020

Hilton Universal City Project

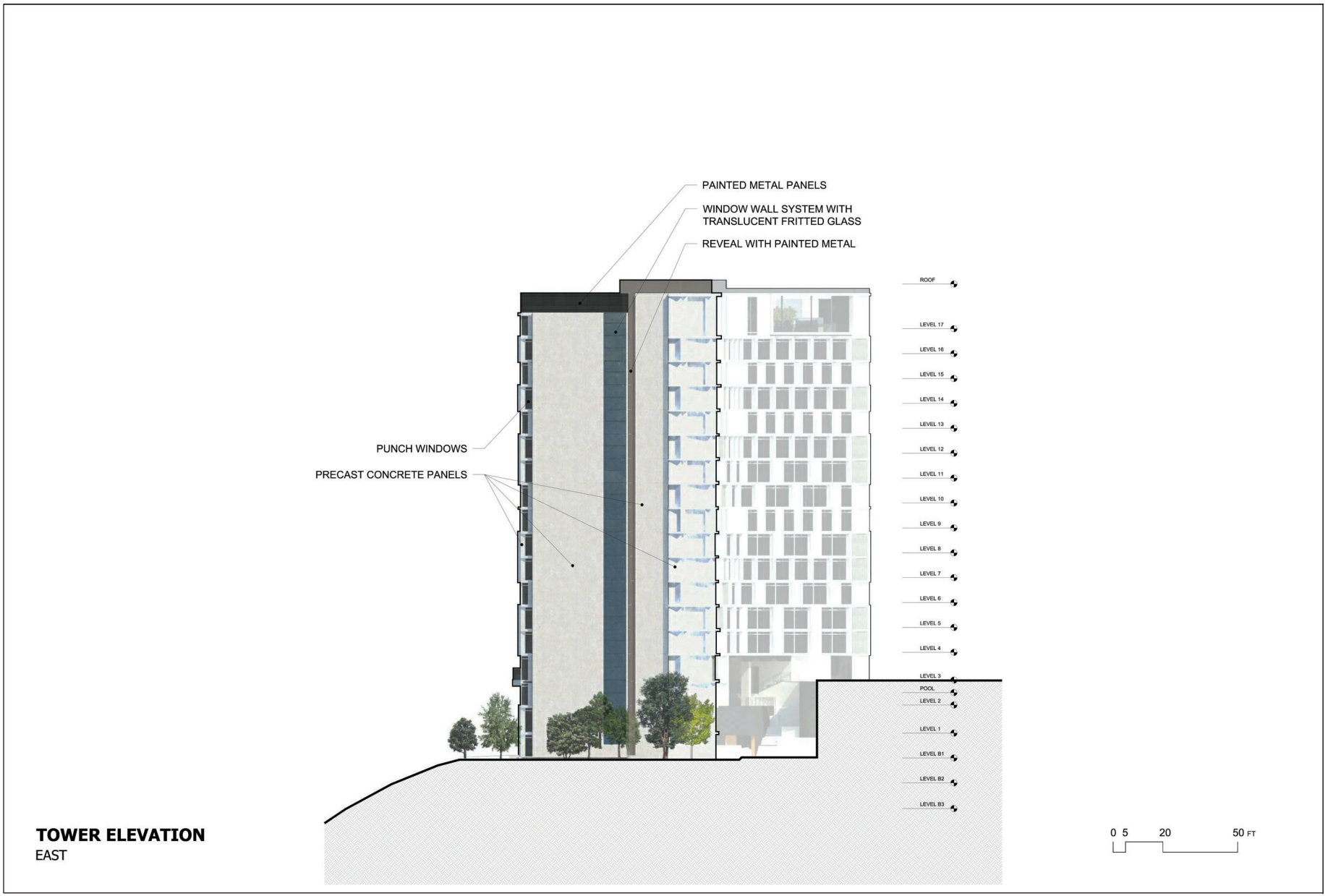
Figure 3-17
South Elevation – Hotel Expansion Building



SOURCE: Large Architecture, 2020

Hilton Universal City Project

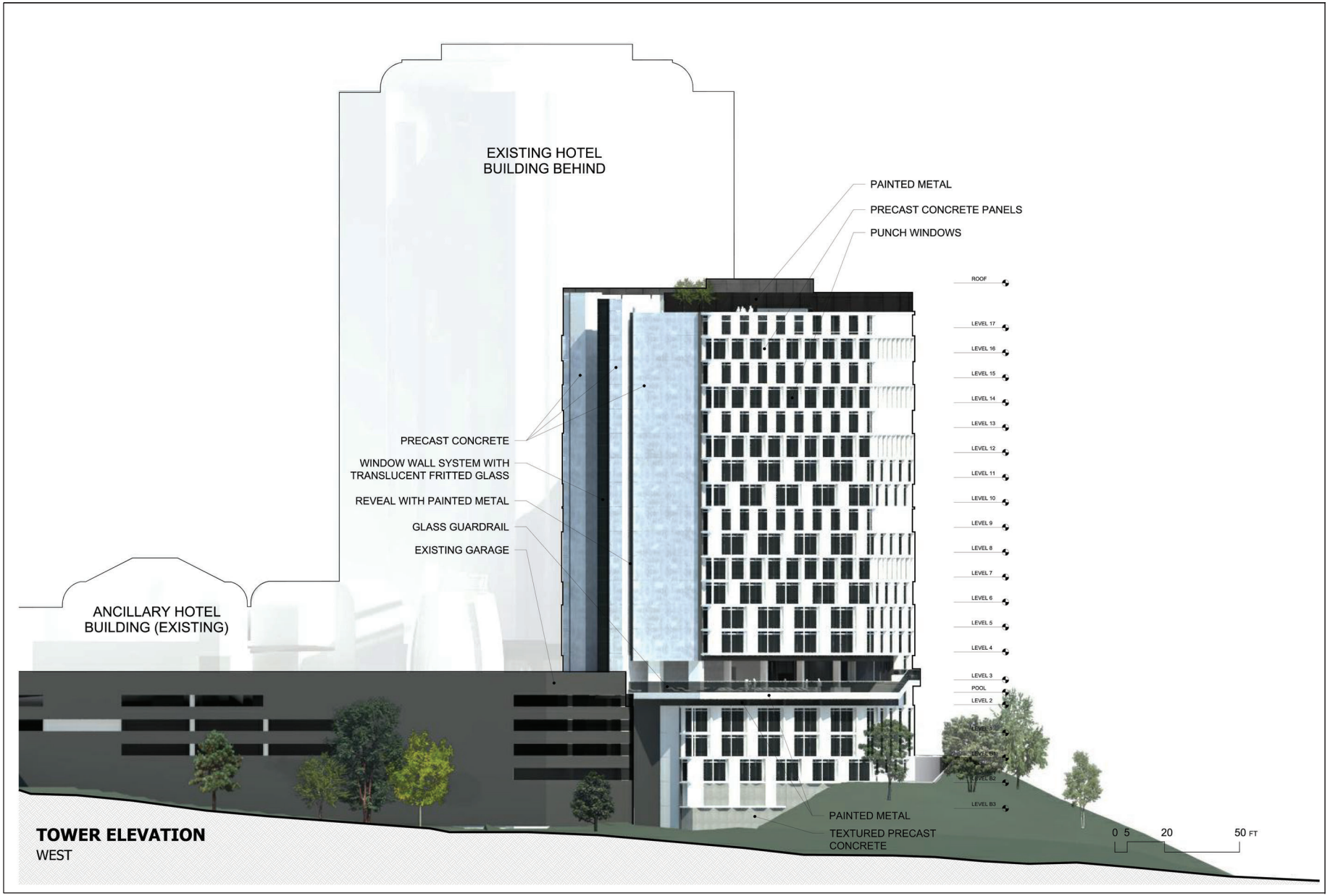
Figure 3-18
North Elevation – Hotel Expansion Building



SOURCE: Large Architecture, 2020

Hilton Universal City Project

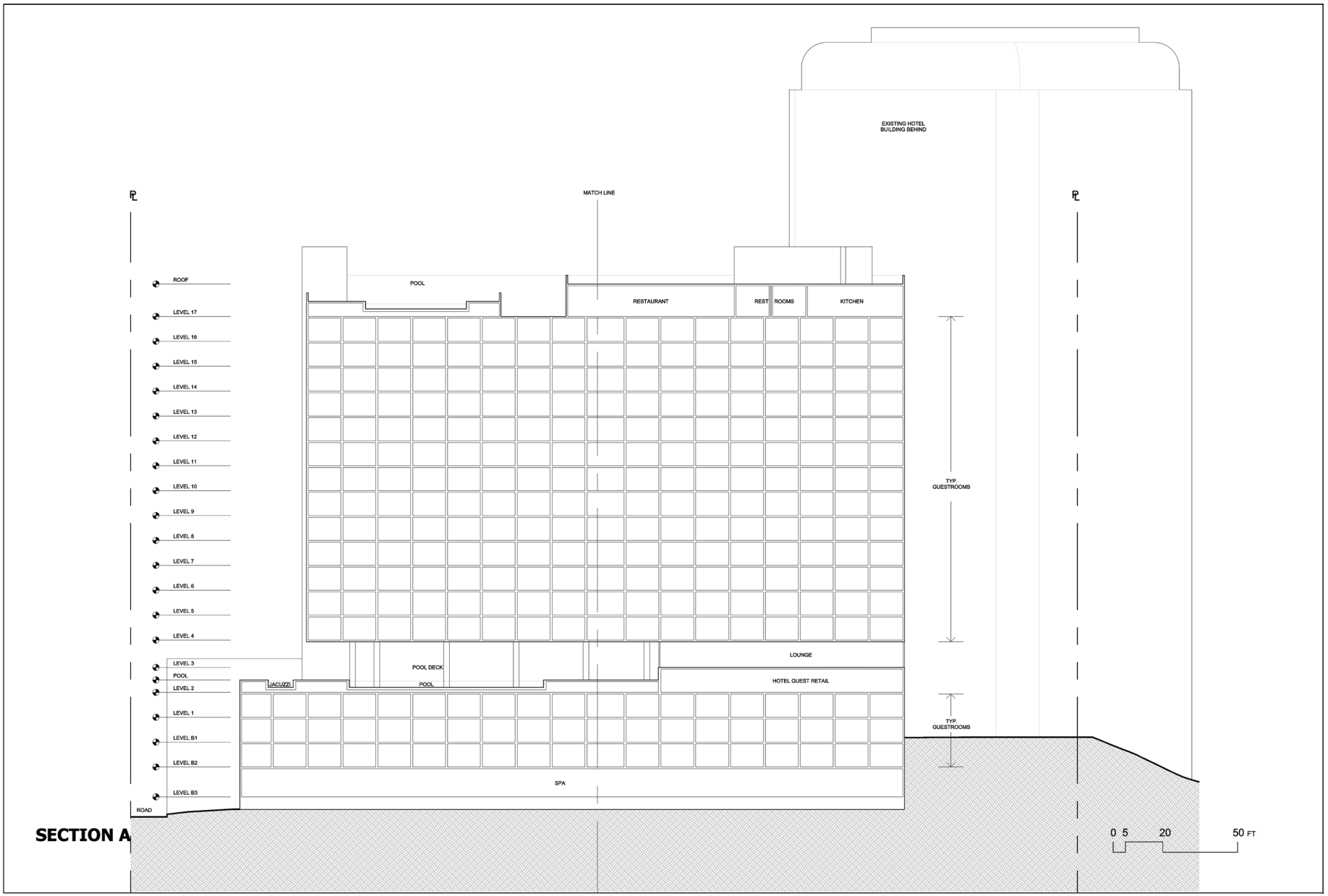
Figure 3-19
East Elevation – Hotel Expansion Building



SOURCE: Large Architecture, 2020

Hilton Universal City Project

Figure 3-20
West Elevation – Hotel Expansion Building



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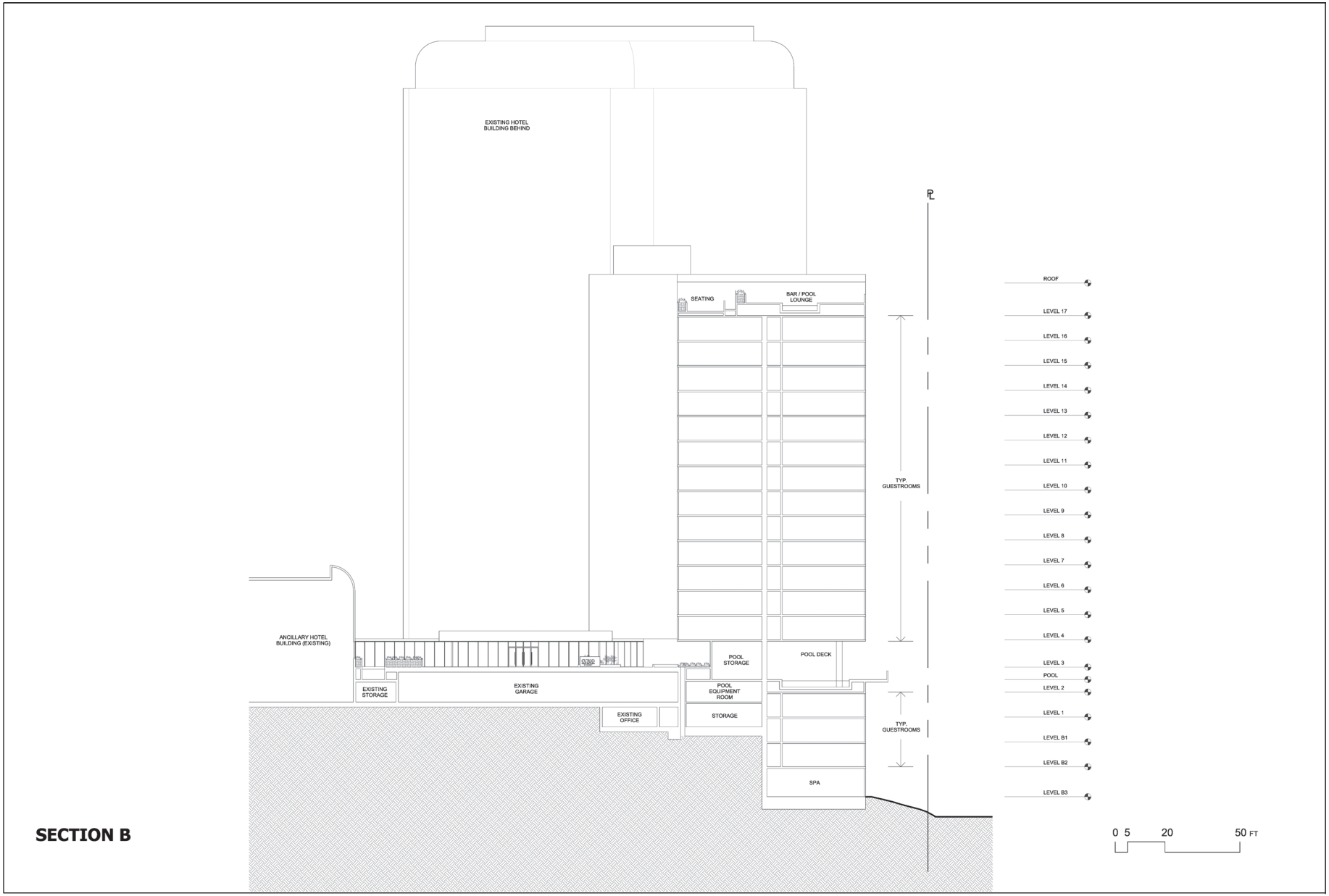
SOURCE: Large Architecture, 2020

Hilton Universal City Project

Figure 3-21
Section A – Hotel Expansion Building



SECTION B

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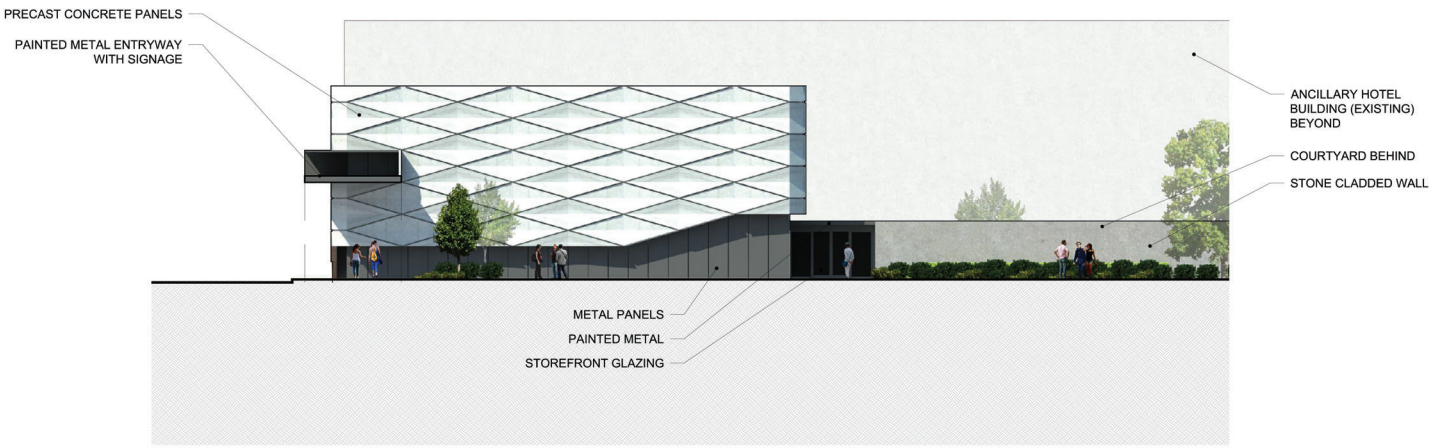
SOURCE: Large Architecture, 2020

Hilton Universal City Project

Figure 3-22
Section B – Hotel Expansion Building



JUNIOR BALLROOM ELEVATION
NORTH

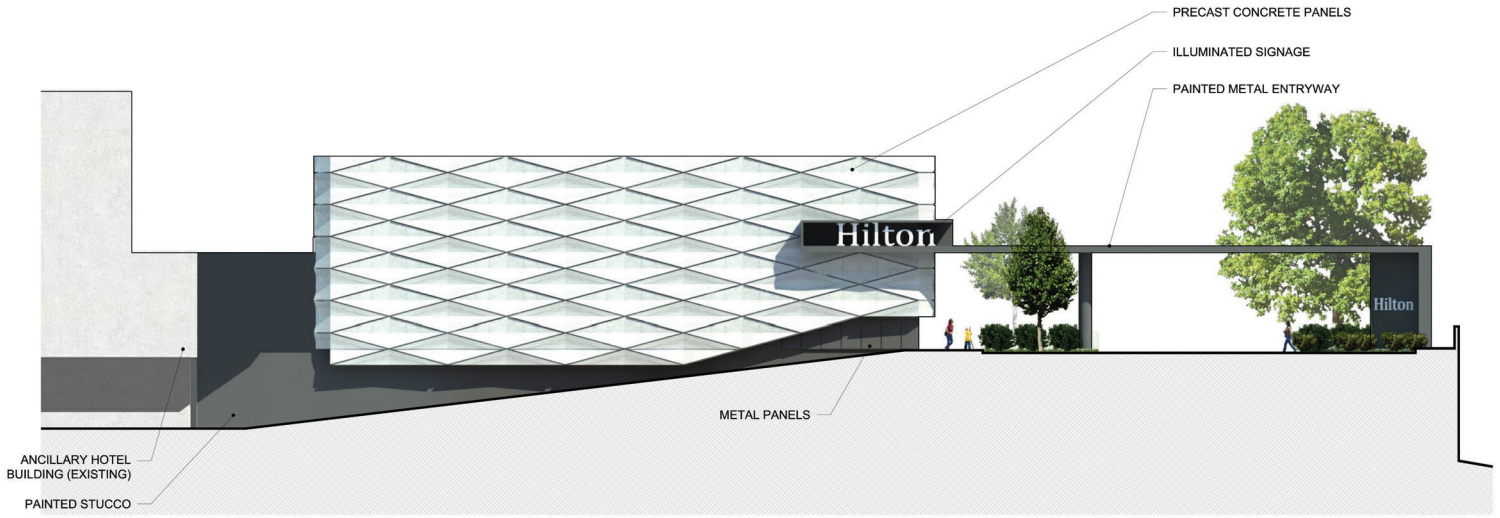
0 5 10 30 FT N

D180143.00

SOURCE: Large Architecture, 2020

Hilton Universal City Project

Figure 3-23
North Elevation – Junior Ballroom



JUNIOR BALLROOM ELEVATION
EAST

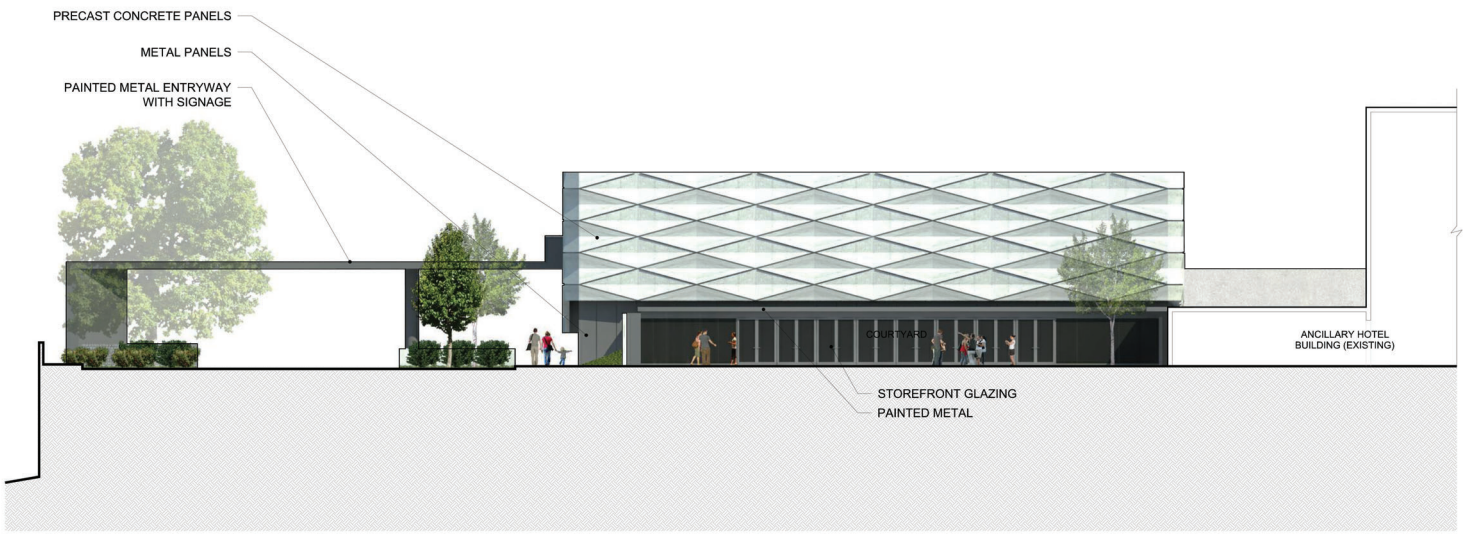
0 5 10 30 FT N

D180143.00

SOURCE: Large Architecture, 2020

Hilton Universal City Project

Figure 3-24
East Elevation – Junior Ballroom



JUNIOR BALLROOM ELEVATION
WEST

0 5 10 30 FT N

D180143.00

SOURCE: Large Architecture, 2020

Hilton Universal City Project

Figure 3-25
West Elevation – Junior Ballroom

D180143.00

SOURCE: Large Architecture, 2020

Hilton Universal City Project

Figure 3-26
Project Rendering – Northwesterly View

D180143.00

SOURCE: Large Architecture, 2020

Hilton Universal City Project

Figure 3-27
Project Rendering – Northeasterly View

D180143.00

SOURCE: Large Architecture, 2020

Hilton Universal City Project

Figure 3-28
Project Rendering – Southerly Interior Plaza View

D180143.00

SOURCE: Large Architecture, 2020

Hilton Universal City Project

Figure 3-29
Project Rendering – Southeasterly View

D180143.00

SOURCE: Large Architecture, 2020

Hilton Universal City Project

Figure 3-30
Project Rendering – Northerly Interior Plaza View

D180143.00

SOURCE: Large Architecture, 2020

Hilton Universal City Project

Figure 3-31
Project Rendering – Westerly Driveway Entrance View

3.3.3 Landscaping

The Project would include a comprehensive replacement and upgrade of landscaping throughout Level 3 consisting of green year-round plant palette with flowering trees and shrubs. **Figure 3-32**, *Conceptual Landscape Plan – Level 3 (South)*, shows the landscape plan for southern portion of the Project Site. The re-configured drop off area and turn around near the proposed lobby and Hotel Expansion Building (South Plaza) would be planted with lush groupings of flowering trees and understory shrubs to provide layers of color, texture, and year-round interest. The eastern and southern perimeters would also include numerous grouping of trees and shrubs. Along the eastern perimeter, on the slope above the service road, existing landscaping would be upgraded to integrate with the overall landscape plan for the Project, while also adding plantings to help screen views of the service road area from off-site vantage points. Along the southern property line setback, a series of large to medium evergreen trees with varied foliage color and texture would provide a densely planted buffer that blends with the adjacent landscape and would screen the lower level of the building. In addition, the area between the Hotel Expansion Building, Existing Hotel Building, and Ancillary Hotel Building would be landscaped to create a green, multi-use open space. **Figure 3-33**, *Conceptual Landscape Plan – Level 3 (North)*, shows the landscape plan for northern portion of the Project Site near the Project driveway entrance and new courtyard adjacent to the Junior Ballroom/Meeting Room Addition (North Plaza). As shown on the Figures 3-31 and 3-32, the Project would also include various decorative pavements and water features throughout Level 3. **Figure 3-34**, *Conceptual Landscape Plan – Level 17*, shows the landscape plan for the pool deck outdoor seating area on Level 17, which would include potted plants.

Plant materials would be combination of native plants and plants adapted to the Southern California climate that have low to medium water demand. New and existing soils would be amended to ensure healthy, vigorous plants and a layer of decorative bark mulch would aid in moisture retention and weed control. The final planting design would include an irrigation system that complies with the State of California Model Water Efficient Landscape Ordinance (MWELO). A smart irrigation controller with weather sensing technology along with a high efficiency drip irrigation system would be utilized to apply water efficiently and effectively to new planting areas.

Project development may impact the existing trees within the Project Site. Based on the Project's Tree Report (see Appendix A), the area of the Project Site (excluding the approximately 14,000 square-foot "L-shaped" portion off of northwest corner of North Plaza) contains a total of 214 trees, with an additional eight trees located off-site in the vicinity of a potential dedicated pedestrian pathway. Of these 222 trees (both on- and off-site), none are City of Los Angeles "protected" trees, 97 are considered City of Los Angeles "significant" trees, and 125 are neither "significant" or "protected" trees. The Project would remove and replace 71 significant trees on the Project Site and an additional three significant trees if the pedestrian improvement shown on Figure 3-4 were to be implemented. The significant trees removed would be replaced at a ratio of at least 1:1 as required by the City Department of Planning and/or the City's Urban Forestry Division's requirements, as applicable.

D180143.00

SOURCE: Large Architecture, 2020

Hilton Universal City Project

Figure 3-32
Conceptual Landscape Plan – Level 3 (South)

LEGEND

- Vehicular Type A - Decorative Concrete
- Vehicular Type B - Pavers
- Pedestrian Pavement Type A - Decorative Concrete
- Pedestrian Pavement Type B - Pavers
- Water Feature
- Shrub Planting Area
- Shade Tree
- Ornamental Tree - Type 1
- Ornamental Tree - Type 2
- Screening Tree

LANDSCAPE PLAN - NORTH

0 5 20 50 FT

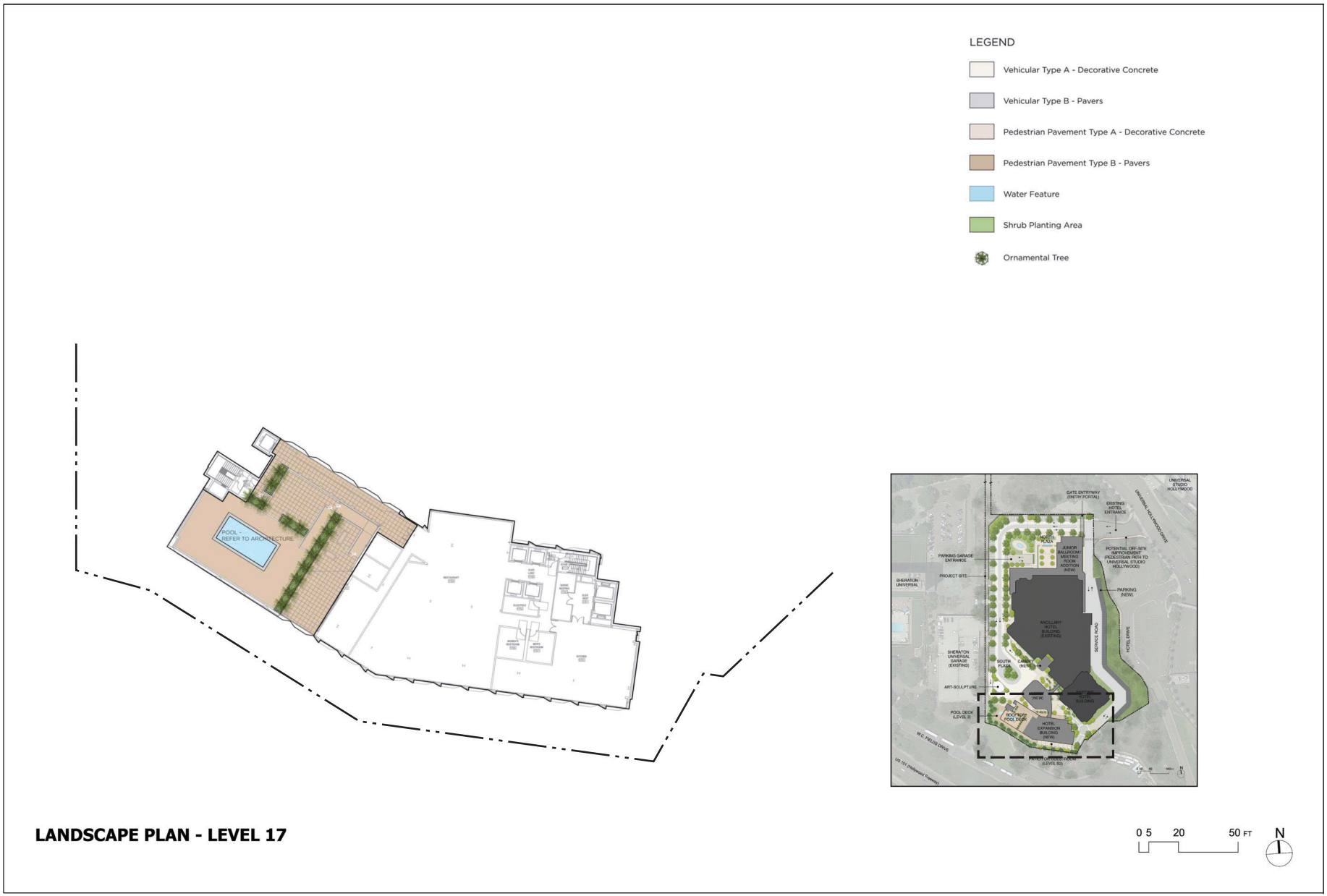
N

D180143.00

SOURCE: Large Architecture, 2020

Hilton Universal City Project

Figure 3-33
Conceptual Landscape Plan – Level 3 (North)



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SOURCE: Large Architecture, 2020

Hilton Universal City Project

Figure 3-34
Conceptual Landscape Plan – Level 17

3.3.4 Access, Circulation, and Parking

3.3.4.1 Access and Circulation

Vehicle access to the Project Site would continue to be provided via the existing driveway on Universal Hollywood Drive. From Universal Hollywood Drive, vehicles entering the Project Site would proceed down the internal roadway to the entrance to the subterranean parking garage located west of the North Plaza or to the motorcourt in the South Plaza. The existing motorcourt in the North Plaza would be removed as part of the Project and vehicle access would no longer be permitted. Hotel guests and visitors would either drop-off their vehicles at the valet area on Level 1 (see Figure 3-11) or proceed to self-park in the expanded subterranean parking garage. Guests to the Hotel's existing conference center or Junior Ballroom would proceed to a new valet station at Level 2 (or P1) of the existing parking garage via the existing vehicular ramp. The existing banquet entrance at the west façade of Ancillary Hotel Building would become a rideshare (i.e., Uber/Lyft) pick-up/drop-off location.

A service road is also generally located along the eastern side of the Ancillary Hotel Building and Existing Hotel Building. Under the Project, the service road would be designated for use by hotel workers accessing new surface parking space that would be installed along the eastern side of the service road. In addition, emergency response vehicles could utilize the service road for access. As shown on Figure 3-4, a circular turnaround, which would accommodate fire trucks/engines, would be located at the terminus of the service road in the southern portion of the Project Site. The service road would not be for use by hotel guests or visitors.

Loading and trash/recycling collection would occur within the Ancillary Hotel Building at Level 2 (P1) similar to existing conditions. The loading dock would be accessed by the service road on the east side of the Project Site.

Access to the Project Site is designed to be pedestrian-friendly and promote access from the nearby transit and commercial uses. Primary pedestrian access to the buildings on the Project Site would continue to be provided from the South Plaza, which would continue to serve as the pick-up/drop-off area for the complimentary Universal Studios Hotel Shuttle. Pedestrian access would also continue to be provided from the parking garage with elevator access. Walkways would be provided around the building perimeters to provide safe pedestrian access through the site to the building entrances. Public access to the Level 17 restaurant and bar would be provided via a dedicated elevator in the Hotel Expansion Building.

Pedestrian access to the Universal Studios Hollywood theme park and Universal City would remain similar to existing conditions. Guests would walk and/or take complimentary Universal Studios Hotel Shuttle to the Universal Studios Hollywood and Universal CityWalk. Currently, guests that choose to walk would take the existing sidewalk/pathway along the north boundary of the Project Site to Universal Hollywood Drive, then use the signalized crosswalk on Hotel Drive to proceed to the pedestrian bridge that crosses over Universal Hollywood Drive to Universal CityWalk and/or Hollywood. As a potential off-site improvement, a new dedicated pedestrian pathway from the Project Site to Universal Hollywood Drive may be constructed off-site along the south side of the driveway entrance. If constructed, the off-site pedestrian access would provide an additional and more direct path for pedestrians accessing the Hotel from Universal Hollywood

Drive.(see Figure 3-4).[4] Guests would then proceed down Universal Hollywood Drive to Hotel Drive and the pedestrian bridge as under existing conditions.

The Project Site is served by a variety of transit options, including the Los Angeles County Metropolitan Transportation Authority (Metro) Red Line Universal/Studio City Station, located at the intersection of Lankershim Boulevard and Universal Hollywood Drive, approximately 0.25 mile west of the Project Site. The Metro Red Line provides direct linkages to downtown Los Angeles, as well as other rail lines within the Metro Rail system, including a connection with the Metro Orange Express Line in North Hollywood and a connection with the Metro Purple Line in Koreatown. The Metro Red Line terminates at Union Station, a major hub for public transportation, including Amtrak, Metrolink, and bus lines providing national, regional, and local access. During the AM and PM peak hours, the Metro Red Line provides headways of approximately 10 minutes per train (i.e., 6 trains per hour). Metro also operates two bus lines along Lankershim Boulevard in the Project vicinity. Specifically, bus stops for Metro Local 155 and Local 224 are maintained at the intersection of Lankershim Boulevard and Universal Hollywood Drive. The Metro Local 155 provides local service between Sherman Oaks and Burbank, while the Metro Local 224 provides local service between Sylmar and the Universal/Studio City Station. The Metro Universal/Studio City Station acts as a transfer hub for both local bus lines. As mentioned above, Universal Studios Hollywood also provides a complimentary shuttle service from the Hotel to the Universal Studios Hollywood and Universal CityWalk and a complimentary tram from the Universal/Studio City Station to the theme park entrances. In addition, a pedestrian bridge over Lankershim Boulevard provides safe and convenient pedestrian access surrounding the Universal/Studio City Station and the Universal Studios Tram Stop.

3.3.4.2 Parking

Currently, there are a total of 652 existing vehicle parking spaces on the Project Site. The new Hotel Expansion Building and Junior Ballroom/Meeting Room Addition would require 408 new vehicle parking spaces. The parking requirement calculations for the Project Site are provided in **Table 3-3**, *Vehicle Parking Required*. As shown therein, the new Project components would require a total of 408 spaces and the existing uses require 652 spaces, resulting in a new parking requirement for the Project Site of 1,060 vehicle parking spaces.

To meet the LAMC vehicle parking requirements, the Project would expand the existing parking garage with three levels of parking below the new Junior Ballroom/Meeting Room Addition, provide overflow surface parking for Hotel workers and service vehicles only along the existing service road that runs generally along the eastern perimeter of the Project Site, and add new parking spaces along the internal roadway on Level 3. The Project would provide at least 129 surface parking spaces along the internal roadway, 72 surface spaces along the service road, and 859 total spaces within the subterranean parking garage. The lowest level under the North Plaza (Level B2) of the subterranean parking garage would include at least 96 spaces within mechanical double parking stackers.

[4] The environmental effects of the potential off-site improvement/pedestrian path to Universal Hollywood Drive are considered in the Project analysis, including limited construction effects (i.e., excavation and grading) which are accounted for as part of overall construction assumptions.

TABLE 3-3
VEHICLE PARKING REQUIRED

Use	Quantity or SF	Parking Ratio[1]	Required
Project			
Additional Guestrooms	395	0.3333 per Guestroom[2]	132
Bar & Restaurant (Public)	6,500	1 per 100 sf	65
Restaurant (Hotel Guest Only, Accessory Use)	5,500	NA	0
Spa (Public)	6,800	1 per 100 sf[3]	68
Spa (Hotel Guest Only, Accessory Use)	3,200	NA	0
Junior Ballroom (Assembly > 750 sf)	5,000	1 per 35 sf	143
Meeting Rooms (Assembly < 750 sf))	10,000	NA	0
		New Spaces Provided by Project	408
Existing Hotel Building and Ancillary Hotel Building	--	Per Certificate of Occupancy	652
		Total Required for Project Site	1,060

1 Parking will be provided pursuant to LAMC Section 12.21.A.4.

2 The Existing Hotel provides parking for existing guestrooms. Since the Existing Hotel provides more than 60 guestrooms, the required parking ratio for the new guestrooms is one (1) space per three (3) guestrooms per LAMC 12.21.A.4.

3 Spa parking based on "Health Club" parking requirements in LAMC Section 12.21.A.4.

Per LAMC Ordinance 182386, Section 12.21.A.16(a)(2), the Project would also be required to provide bicycle parking. As shown in **Table 3-4**, *Bicycle Parking Required*, the Project would provide 73 bicycle parking spaces to meet LAMC requirements, which require bicycle parking for the new development.[5] Bicycle parking would be provided on Level B2 (North)

TABLE 3-4
BICYCLE PARKING REQUIRED

Use	Quantity or SF	Requirement	Required
Hotel (Long-Term)	395	1 per 20 Guestrooms	20
Hotel (Short-Term)	395	1 per 20 Guestrooms	20
Commercial (Long-Term) - Restaurant	6,500	1 per 2,000 square-feet	3
Commercial (Short-Term) – Restaurant	6,600	1 per 2,000 square-feet	3
Spa (Long-Term)	6,800	1 per 2,000 square-feet	3
Spa (Short-Term)	6,800	1 per 2,000 square-feet	3
Junior Ballroom (Long-Term)	5,000	1 per 700 square-feet	7
Junior Ballroom (Short-Term)	5,000	1 per 350 square-feet	14
		Spaces required by Project	**73**
		Spaces provided by Project	**73**

Note: The bicycle parking requirement is based Ordinance No. 182,386.This ordinance was in effect at the time the application was filed with the Department of City Planning.

5 No bicycle parking is currently provided on the Project Site. While bicycle parking is required for the new development, it is not required for the existing square footage.

3.3.5 Lighting and Signage

The Project would retain the existing red, channel-letter "Hilton" sign atop the Existing Hotel Building's northwestern and southeastern façades. Existing identification and wayfinding signage at the driveway entrance along Universal Hollywood Drive would also remain. New wayfinding signage would be added to the interior of the Project Site to assist guests and visitors on finding the entrance to the new buildings. The Project Site is not located in the Universal City Sign District and no off-site advertising signage is proposed.

The Project would be designed to maintain similar levels and types of outdoor lighting as under existing conditions. Accent and security lighting similar to that currently in use on the Project Site, such as sconces, architectural lighting, and low-level landscaping lighting, would be installed on the new buildings. Canopies would be installed above the entry doors at existing and proposed entrances and the entrances would be lighted for security and to create a sense of arrival (see figure 3-28). The restaurant would include low-level lighting for the outdoor dining areas. All exterior utility lighting over doors and along roadways would be low wattage, low-level, full cutoff luminaries to contain light within the Project Site. All lighting would be shielded and directed to minimize exposure onto neighboring properties. The use of pole mounted lighting or floodlights are not proposed.

The Project would comply with LAMC lighting regulations that include approval of street lighting plans by the Bureau of Street Lighting; limited light intensity from signage to no more than three foot-candles above ambient lighting; and limited exterior lighting to no more than two foot-candles of lighting intensity or direct glare onto nearby sensitive uses (i.e., Campo de Cahuenga Museum).

3.3.6 Hotel Operations

The proposed new uses would generally maintain the same operational hours as the existing Hotel. Similar to the existing meeting/banquet rooms, the new junior ballroom and meeting rooms would also be available for use 24-hours a day, seven days a week. The restaurant on Level 17 of the Hotel Expansion Building would operate typically from 6:00 A.M. to 11:00 P.M. with flexibility for special occasions. The bar area would generally be open from 11:00 A.M. to 2:00 A.M., consistent with LAMC requirements. Live, soft music is proposed within the bar and restaurant for up to a three-person ensemble and a small amplifier, as well as soft background ambient music. Similar to the existing operation, the new pool areas would be for use by hotel guests and members of the spa and would maintain hours of operation from 6:00 A.M. to 12:00 A.M.

Currently, the hotel employs approximately 334 full-time staff members and 76 part-time and seasonal employees, which equates to 372 full-time equivalent (FTE) employees. The Project is anticipated to increase the number of employees at the hotel by approximately 220 FTE employees, including 177 full-time employees and 86 seasonal/part-time employees. When combined with the existing hotel's approximately 372 FTE employees, the hotel will employ a total of approximately 592 FTE employees under the Project.

3.3.7 Site Security

The Hotel would continue to implement its comprehensive security program described above following the completion of the Project to ensure the safety of hotel guests and other visitors to the Project Site. Project design would include well-lit public and semi-public spaces, as well as active security features. These features include comprehensive coverage and monitoring of key

areas through CCTV. Access to non-public areas of the hotel would be restricted by electronically controlled and locking access cards. Full time 24-hour, security would be provided by hotel staff at the front desk and security personnel. Security personnel duties would include, but not be limited to, assisting guests and visitors with Project Site access; monitoring entrances and exits of buildings; managing and monitoring fire/life/safety systems; and patrolling the property. Initial alarms such as intruder alarms or duress alarms would be the responsibility of site security personnel as first responders. Access to the parking garage is controlled by an electronic access gate and is monitored by CCTV.

3.3.8 Sustainability Features

The Hotel would continue its commitment to green building design and sustainability. The Project would be designed to meet the California Green Building Standards (CALGreen) Code as adopted and amended by the City of Los Angeles through the incorporation of green building techniques and other sustainability features, including those within the City of Los Angeles Green Building Code, where applicable.

Additional Project design features that would contribute to energy efficiencies may include, but are not limited to: the use of materials and finishes that emit low quantities of volatile organic compounds (VOCs); the installation of heating, ventilation, and air conditioning (HVAC) systems that utilize ozone-friendly refrigerants; high-efficiency appliances; stormwater retention; the incorporation of water conservation features; and the provision of bicycle parking and other amenities for bicyclists. The subterranean parking garage expansion would provide infrastructure for vehicular charging stations per the requirements of the City of Los Angeles. The Hotel Expansion Building would also utilize the recycling program and facilities that are currently located in the Existing Hotel Building

3.3.9 Anticipated Construction Schedule

Construction of the Project is anticipated to begin in 2023 and is estimated to be completed in 2025 with construction occurring for approximately two years. Construction is expected to take place in a single construction phase. Project development would require excavation and grading of the Project Site, including some areas of landscaped hillsides. Project construction would require excavation to a maximum depth of approximately 50 feet below grade for construction of additional subterranean parking. Up to approximately 70,000 cubic yards of soil are anticipated to be excavated and would require export and disposal off-site. Construction would occur Monday through Friday between 7:00 A.M. and 9:00 P.M.; and Saturdays between 8:00 and 6:00 P.M., consistent with the allowable hours per the LAMC. No construction hauls would be allowed during key Universal Studios Hollywood calendared and communicated events, such as the Universal Halloween Horror Nights, or on weekends & holidays when the theme park is at peak attendance without written permission granted in advance by Universal Studios Hollywood executive office.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The EIR will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary

entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- Pursuant to LAMC Section 12.32-Q, a Vesting Zone Change for the portions of the Property from PB and RE15 to allow a uniform C2 zone for the entire Property;
- Pursuant to LAMC Section 12.32-F, a Height District Change for the Property from Height District No. 1 to Height District No. 2;
- Pursuant to LAMC Section 12.24-U.14, a Conditional Use for a "Major" development project that creates or results in 250 or more hotel guest rooms in the C2 zone;
- Pursuant to LAMC Section 12.24-W.1, a Conditional Use Permit for the sale or dispensing of alcoholic beverages for onsite consumption at the Top Level restaurant and pool area on Level 17, restaurant on Level 2, and Junior Ballroom;
- Pursuant to LAMC Section 12.24-W.18, a Conditional Use Permit to allow for dancing and live entertainment in conjunction with the existing lobby/lounge area of the atrium within the Ancillary Hotel Building, the proposed Junior Ballroom, and proposed restaurants on Level 2 and Level 17;
- Pursuant to LAMC Section 16.05, Site Plan Review for a development that results in an increase of 50 guestrooms; and
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, haul route, Department of Public Works approval to remove non-protected trees from the Property, and sign permits.

3.5 RESPONSIBLE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the lead agency (State CEQA Guidelines Section 15381). The list below identifies whether any responsible agencies have been identified for the Project.

- South Coast Air Quality Management District (SCAQMD)

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Senate Bill (SB) 743 [Public Resources Code (PRC) §21099(d)] sets forth new guidelines for evaluating project transportation impacts under CEQA, as follows: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." PRC Section 21099 defines a "transit priority area" as an area within 0.5 mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC Section 21099 defines an "employment center project" as "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. PRC Section 21099 defines an "infill site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds in the 2006 L.A. CEQA Thresholds Guide, including those established for aesthetics, obstruction of views, shading, and nighttime illumination.

The site is designated for Regional Center Commercial land uses. Regional Centers are defined as a focal point of regional commerce, identity and activity and containing a diversity of uses such as corporate and professional offices, residential, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities and supporting services. The Regional Center Commercial land use designation has corresponding zoning designations of Commercial (CR, C1.5, C2, and C4), Multi-Family Residential (RAS3, RAS4, R3, R4, and R5). The site is developed with a unified commercial development, which includes hotel uses and associated parking. The Project Site is zoned with a mix of C2, PB, and RE15 zones, which are permitted within the Regional Center Commercial designation. The majority of the site is zoned C2 for commercial uses and is developed with a 495-room hotel, restaurant, bar, and conference rooms. The PB zone allows for parking structures which support commercial uses. The PB (Parking Building) zoned portion of the Site is located adjacent to the existing buildings and is developed with an existing parking structure which is integrated with the existing on-site buildings located within the C2 zone. The portions of the site zoned RE15 (Residential Estate), which is a zone that does not permit residential uses, include an approximately 20-foot wide strip of land along Universal Hollywood Drive developed with a sidewalk and a portion of a landscaped slope, as well a small trapezoidal area (approximately 11,000 square feet in area) that forms the southern portion of the Project Site, and is utilized as a landscaped slope as part of the general landscaped area of the commercial campus. As the Project Site is located within an area designated for Regional Commercial uses, is developed with commercial uses within the existing zones, and is requesting a unified C2 zone the site; therefore, the Project meets the criteria of being located on a property designated for commercial uses.

The related City of Los Angeles Department of City Planning Zoning Information (ZI) File ZI No. 2452 provides further instruction concerning the definition of transit priority projects and that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA."[6]

However, ZI No. 2452 further states that "the law does not limit the ability of the City to regulate, or study aesthetic related impacts pursuant to other land use regulations found in the Los Angeles Municipal Code (LAMC) or the City's General Plan, including specific plans." Thus, pursuant to PRC Section 21099 and ZI No. 2452, impact findings related to views, scenic resources, visual character, shading, and light and glare, would not be required, unless standards related to these issues are set forth in the General Plan, the LAMC, and other adopted plans. In the latter case, plan or regulation consistency must be evaluated for determination of significance.

PRC Section 21099 applies to the Project since: 1) the Project is an employment center project as it is located on an infill site, is zoned for commercial uses, and has a FAR of greater than 0.75; and 2) the Project Site is located within a TPA since it is located within 0.5 mile of the Metro Red Line Universal/Studio City Station, which is located at the intersection of Lankershim Boulevard and Universal Hollywood Drive, approximately 0.25 mile west of the Project Site. Therefore, the Project vis a vis Checklist Questions (a), (b), and (d), below, would be exempt from aesthetic impacts. In regard to these issue areas, the analysis in this Initial Study is for ***informational purposes only*** *and not for determining whether the Project will result in significant impacts to the environment. The respective evaluations in this Initial Study are included to discuss what aesthetic impacts would occur from the Project if PRC Section 21099(d) was not in effect. As such, nothing in the evaluations of Questions (a), (b), and (d) in this Initial Study shall trigger the need for any CEQA findings, CEQA analysis, or CEQA mitigation measures. Conversely, Question (c), below, requires an evaluation of whether a project would conflict with applicable zoning and other regulations governing scenic quality in an urbanized area. Because consistency with adopted standards is not exempt from determination of significance, and consistency with policies must be evaluated under Question (c), a finding regarding the Project's level of impact is provided.*

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099 would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐

6 City of Los Angeles Department of City Planning, Zoning Information File ZA No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking Within TPAs Pursuant to CEQA. Available at: http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf. Accessed January 22, 2020.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

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

Less Than Significant Impact. The Project Site is located within an urbanized area. Scenic views in the Project vicinity include views of the Verdugo Mountains and views of the Hollywood Hills from public locations as well as views of designated and/or potential historical\cultural buildings in the Project Site vicinity, such as the off-site Campo de Cahuenga Memorial Park and Museum on Lankershim Boulevard. The Project Site is situated on a promontory (a point of high land) that descends moderately to the west, south, and east at a grade of approximately 50 percent (2:1 horizontal-to-vertical gradient). The top of the promontory is approximately 707 feet above mean sea level (msl) and the on-site low point is approximately 670 feet above msl, with an overall elevation change of approximately 37 feet across the Project Site. Due to the topography of the Project Site and the surrounding area, views of the Project Site are available from various public vantage points, including from public parks; the Hollywood Freeway; Universal Studios Hollywood and Universal CityWalk: local roads; and the Universal City Major Vista Scenic Point on Mullholland Drive (approximately 0.72 mile to the southwest of the Project Site), a designated Scenic Highway in the City of Los Angeles General Plan Transportation Element and designated scenic parkway under the Mulholland Scenic Parkway Specific Plan.

At present, the Project Site is developed with the 24-story Existing Hotel Building, which provides 495 guestrooms; the attached, one- and two-story Ancillary Hotel Building containing meeting/banquet rooms and ancillary hotel uses; a three-level subterranean parking garage; circulation facilities (i.e. internal roadway and service road); the Existing Outdoor Pool Area; and other related improvements. The Project would construct a new 20-story Hotel Expansion Building, a one-story Junior Ballroom/Meeting Room Addition and associated improvements on the Project Site. As such, the Project would increase the density of development on the Project Site and alter visual conditions as viewed from some off-site locations in the Project vicinity.

The tallest component of the proposed Project would be the Hotel Expansion building. However, the Existing Hotel Building rises to approximately 975 msl and the proposed Hotel Expansion Building would rise to approximately 890 feet msl. As such, the Hotel Expansion Building would be approximately 85 feet or seven stories shorter than the Existing Hotel Building. Nonetheless,

the Hotel Expansion Building would be prominently visible from locations along the Hollywood Freeway and local streets in the surrounding vicinity. The one-story Junior Ballroom/Meeting Room Addition and other landscape, hardscape and decorative improvements throughout the Project would be minimally visible from Hotel Drive and Universal Hollywood Drive due to intervening topography and landscaping along these roadways. From other more remote off-site areas, proposed improvements other than the Hotel Expansion Building would be minimally visible or not visible due to intervening topography, landscaping and other buildings in the area. Because the Project would be visible, or at least in part, from some public streets and highways, its potential to affect scenic views is evaluated herein for informational purposes.

Including the Existing Hotel Building, the Project Site's local environment includes two other high-rise commercial buildings: the 36-story, 10 Universal City Plaza Office Building located west of the Project Site at the northeast corner of Lankershim Boulevard and the US-101 (the Hollywood Freeway), and the adjacent 20-story Sheraton Universal Hotel. The Project vicinity is primarily developed with the entertainment and production-related uses associated with Universal Studios Hollywood, with varying heights and types of development. The visual character of the Hotel Expansion Building would be consistent with existing conditions, in which high rise buildings and development are visible and dominant within the existing setting.

The South Weddington Park, which is the nearest public park from the Project Site, is located approximately 0.4 mile northwest of the project Site. From this park, the 36-story, 10 Universal City Plaza Office Building is visible as the dominant structure in the view field. Behind the 10 Universal City Plaza Office Building are the existing 20-story Sheraton Universal Hotel and the 24-story Existing Hotel Building. The proposed Hotel Expansion Building would not be visible behind the Sheraton Universal Hotel and would not be visible from this view location.

As seen from the eastbound Hollywood Freeway, visible high rise buildings include the 36-story, 10 Universal City Plaza Office Building, the 20-story Sheraton Universal Hotel, and the 24-story Existing Hotel Building. The hotel buildings, which are located at a higher elevation than the Hollywood Freeway, and the 10 Universal City Plaza Office Building currently dominate the view field as seen from the Hollywood Freeway. Landscaping along the east edge of the Hollywood Freeway obstruct views of the base of the hotel buildings. No other scenic vistas, natural hillsides, or unique cityscape are visible in the background of the Project Site. The west edge and south face of the Hotel Expansion Building would be visible adjacent to the Existing Hotel Building. The visual character of the Hotel Expansion Building would be consistent with existing conditions, in which high rise buildings and development are visible and dominant within the existing setting. The Project would not block scenic vistas or features, significantly change the character of the view, or have a substantial adverse effect on a scenic vista as seen from this perspective.

The Mullholland Drive Universal City Overlook is located approximately 0.7 mile to the southwest of the Project Site. As shown in **Figure 4-1**, *View of Project from Mullholland Drive Universal City Overlook*, broad views of the west San Fernando Valley and the Verdugo Mountains are available because of the elevated vantage point. Existing high-rise buildings visible from this location include the 20-story Sheraton Universal Hotel and the 24-story Existing Hotel Building as well as the 36-story, 10 Universal City Plaza Office Building. The Universal Studios CityWalk and theme park are also visible. Under existing conditions, no vistas of the San Fernando Valley or Verdugo Mountains are substantially blocked by the existing high-rise buildings in Universal City, or by taller buildings in the City of Burbank located further to the north. As shown in Figure 4-1, while the Hotel Expansion Building would be visible in the foreground of this view location and would

block views of the lower stories of the Existing Hotel Building, it would not block any background views of the San Fernando Valley or Verdugo Mountains or substantially change the character of the view. Because the Hotel Expansion Building would be compatible with the surrounding urban setting, it would not have a significant adverse effect on a scenic vista.

From vantage points approximately 500 feet and more to the east/northeast of the Project Site, the existing Universal Studios landscaping and entertainment features are visible in the near foreground, with the 24-story Existing Hotel Building prominently visible. The top stories of the Hotel Expansion Building would be visible beyond the Existing Hotel Building from some locations and intervening landscaping and trees within the Universal Studios theme park and at the edge of the Project Site would block views of the Hotel Expansion Building's lower stories. Because no scenic resources or vistas are visible across the Project Site from this area and because the Hotel Expansion Building would be consistent with the built environment and urban character of Universal City, and would represent only a minor visual change, it would not have a substantial adverse effect on the existing scenic vista.

From the Hollywood Freeway near the intersection of W. C. Fields Drive and Hotel Drive, approximately 550 feet to the south of the Project Site, the upper stories of the Existing Hotel Building are visually prominent and the upper stories of the 10 Universal City Plaza Office Building are visible to the left. No scenic vistas or features are visible in the view field across the Project Site. The Hotel Expansion Building would be prominently visible between the two other existing high-rise buildings from this location. The Hotel Expansion Building would be consistent with the existing character of the view and would not block existing views of any buildings or scenic vistas. Therefore, it would not have a significant adverse effect on a scenic vista.

From Blair Drive, which is located approximately 0.7 mile to the east of the Project Site, landscaping and building walls within the Universal Studios theme park property generally block broad views of the Project Site. The upper stories of the Existing Hotel Building are visible beyond the intervening landscaping as is the taller 10 Universal City Plaza Office Building. Hillside development within the Hollywood Hills is also visible as are the more distant Simi Hills. From this location only a small portion of the Hotel Expansion Building would be visible adjacent to the Existing Hotel Building. The Project would not substantially change the character of the view field, and therefore, would not have a significant adverse effect on a scenic vista.

From a vantage point located approximately 0.3 miles to the southwest of the Project Site, adjacent and nearby high-rise buildings are visible, including the 20-story Sheraton Universal Hotel and the Existing Hotel Building. Foreground views of the Hollywood Freeway and commercial uses are partially blocked by intervening vegetation. Long-range views of the Verdugo Mountains are available beyond the Sheraton Universal Hotel and the Hollywood Hills are visible in the background to the right of the Existing Hotel Building. The Hotel Expansion Building would be visible in the foreground from this vantage point and would partially block views of the Existing Hotel Building, although upper stories of the Existing Hotel Building would continue to be visible. Also, the Hotel Expansion Building would be lower in height than the Existing Hotel Building and relatively similar in height to the Sheraton Universal Hotel as viewed from this location. As such, the Hotel Expansion Building would be consistent with the character of the existing developed environment. Because no scenic resources or vistas are visible across the existing Project Site, the Hotel Expansion Building would not have a substantial adverse effect on a scenic vista.

D180143.00

SOURCE: VisionScape Imagery, 2020

Hilton Universal City Project

Figure 4-1
View of Project from Mullholland Drive Universal City Overlook

ESA

From approximately 0.2 mile to the northeast of the Project Site within Universal Studios Hollywood, views across the Project Site are almost entirely blocked by existing structures within the theme park and/or landscaping. The upper stories of the Existing Hotel Building and Sheraton Universal Hotel buildings are only minimally visible beyond the intervening Universal City structures and landscaping. No scenic vistas or features are located in the view field across the Project Site. Since the Hotel Expansion Building would not be visible from this view location, the Project would not have a substantial adverse effect on a scenic vista.

In summary, with the exception of views from Mulholland Drive, broad scenic vistas are currently not available across the Project Site from surrounding representative public view points. The Hotel Expansion Building would be visible from Mulholland Drive, but would not block views of scenic vistas across the Project Site. The Hotel Expansion Building would also be lower in height than surrounding existing high-rise buildings in Universal City and would be consistent with the modern architectural character of existing development. As such, the Hotel Expansion Building would not comprise dominant or conflicting features that would substantially change the basic character of the view field and the Project would not cause a substantial adverse effect on a scenic vista. Furthermore, pursuant to PRC Section 21099(d)(1) and ZI No. 2452, impacts on scenic vistas from a residential mixed-use or employment center project, such as the Project, located within a TPA shall not be considered significant impacts on the environment. Impacts would be less than significant.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Less Than Significant Impact. The Project Site is fully developed and does not contain natural scenic resources, such as outcroppings or native trees and vegetation. The Project Site, however, is characterized by mature ornamental landscaping and numerous large trees which are considered "significant" trees by the City of Los Angeles Tree Preservation Ordinance No. 177.404. Such trees include any tree with a trunk diameter of 8 inches or larger.

The Project Site is not located adjacent to a State-designated scenic highway.[7] Pursuant to PRC Section 21099(d)(1) and ZI No. 2452, impacts on scenic resources from a residential mixed-use or employment center project, such as the Project, located within a TPA shall not be considered significant impacts on the environment. Therefore, no further analysis of this topic in an EIR is required. The impact conclusion for aesthetics is less than significant.

c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. The Project is located within an urbanized area and, as such, the analysis focuses on consistency with regulations that govern scenic quality, including regulations for building heights, setbacks and open space. These include LAMC zoning regulations and applicable policies of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Community Plan (Community Plan), including Chapter V, Urban Design, as well as the Urban Form and Neighborhood Design Chapter of the Framework Element.

[7] Caltrans, Scenic Highways, available at: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Accessed January 22, 2020.

The Project's consistency with tree replacement requirements are discussed in Section IV. Biological Resources, Threshold (e), below. As discussed therein, the Project would replace all "significant" trees at a minimum of a 1:1 ratio or as otherwise required by the City Planning Department and/or or Urban Forestry Division.

The Project's compliance with the City's lighting regulations is evaluated under Threshold (d), below. As discussed therein, the Project would comply with regulations pertinent to exterior lighting and signage and, as such, would not conflict with these regulations.

The Sherman Oaks-Studio City-Toluca Lake-Cahuenga Community Plan is the official guide to future development within the Community Plan area. **Table 4-1,** *Consistency of the Project with Applicable Aesthetics Policies of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Community Plan*, evaluates policies of the Community Plan related to aesthetics.

TABLE 4-1
PROJECT CONSISTENCY WITH APPLICABLE AESTHETICS POLICIES OF THE SHERMAN OAKS-STUDIO CITY-TOLUCA LAKE-CAHUENGA COMMUNITY PLAN

Objectives	Would the Project Conflict?
Commercial	
Policy 2-1.3: Require that projects be designed and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses and development.	**No Conflict.** The Project would feature modern, linear architectural elements that would complement the Existing Hotel Building and the Ancillary Hotel Building. The Project design would create a compatible architectural theme by incorporating structural elements and materials from the existing buildings on the Project Site and surrounding vicinity. As shown in Figures 3-26 and 3-27, similar to the Existing Hotel, the Hotel Expansion Building would incorporate materials such as clear and tinted glass, architectural precast panels, painted metal panels, tile and exterior plaster. The rooftop would be articulated to define the restaurant space which would be enclosed by an operable glazing system that allows for indoor and outdoor dining. The Hotel Expansion Building would be integrated with the existing on-site buildings via the new single-story main lobby located between the Existing Hotel Building and the high-rise component of the Hotel Expansion Building. The Junior Ballroom/Meeting Room Addition would be constructed with pre-cast concrete panel, metal panels and stucco to provide a complementary design to the Ancillary Hotel Building and Existing Hotel Building. Parking for the proposed uses would continue to be accommodated internal to the Project Site, with new surface parking on Level 3 and along the service road. Aside from parking along the internal driveway off the Hotel entrance in the northern area of the Project Site, the majority of the Project's new parking would not be visible from off-site locations.

TABLE 4-1
PROJECT CONSISTENCY WITH APPLICABLE AESTHETICS POLICIES OF THE SHERMAN OAKS-STUDIO CITY-TOLUCA LAKE-CAHUENGA COMMUNITY PLAN

Objectives	Would the Project Conflict?
Objective 2-4: To enhance the appearance of commercial districts.	**No Conflict.** The Project would be consistent with the architectural and visual character in terms of building height and materials with the existing built environment of the Project Site and adjacent uses. The 20-story Hotel Expansion Building would be compatible with the existing high rise character of the Project vicinity, which includes the 24-story Hilton Universal City Hotel tower, the 20-story Sheraton Universal Hotel tower, and the 36-story 10 Universal City Plaza Office Building. In addition to multi-stories, the Project, similar to the surrounding uses, would continue the pattern of deep setbacks from adjacent public rights-of-way. Existing landscaping would be replaced with new landscaping under the Project.
Policy 2-4.1: Require that any proposed development be designed to enhance and be compatible with adjacent development.	**No Conflict.** As described above, the Project would be consistent with and enhance the architectural character of existing development within the Project Site. The Project would contribute to the high-rise character of the Project vicinity including the design, height, building orientation, and materials.
Policy 2-4.2: Preserve community character, scale and architectural diversity.	**No Conflict.** The Project would be consistent with the scale and the modern architectural character, including use of plazas and landscaped setbacks, of existing surrounding high-rise buildings. The building heights in the area range from low-rise commercial, office, and theme park structures to high-rise hotels and office buildings. The topography in the area is varies and modulates the height differences. The height of the Hotel Expansion Building (20 stories and approximately 230 feet above grade to the top of the building) would be compatible with nearby high-rise structures. The Project would contribute to the diversity of heights of the surrounding, existing high-rise structures, which include the 24-story (approximately 258 feet above grade as measured from the South Plaza) Existing Hotel, the 20-story Sheraton Universal Hotel tower, and the 36-story 10 Universal City Plaza Office Building. The Project would be compatible in terms of design and scale with the existing development in the surrounding area. Thus, the Project would blend in with the development in the area and would preserve the character and scale and contribute to the architectural diversity in the community.
Policy 2-4.3: Improve safety and aesthetics of parking areas in commercial areas.	**No Conflict.** Parking for the Project Site would be provided in the subterranean parking garage. The Project would also install new surface parking spaces on Level 3 and along the service road on the eastern perimeter of the Project Site. Aside from parking spaces located along the north and east sides of the internal driveway roadway near the driveway entrance, the majority of the Project's new parking would not be visible from off-site locations. Extensive landscaping and decorative paving along the internal driveway would be provided, as shown in Figures 3-4, 3-29, 3-30, 3-31, 3-32 and 3-33 of this Initial Study, which would contribute

TABLE 4-1
PROJECT CONSISTENCY WITH APPLICABLE AESTHETICS POLICIES OF THE SHERMAN OAKS-STUDIO CITY-TOLUCA LAKE-CAHUENGA COMMUNITY PLAN

Objectives	Would the Project Conflict?
	positively to the aesthetics of the surface parking areas. Access to the subterranean parking levels would be controlled by an electronic access gate and monitored by CCTV in order to ensure the safety of guests and visitors.
Open Space	
Goal 5: A community with sufficient open space in balance with development to serve the recreational, environmental and health needs of the community and to protect environmental and aesthetic resources.	**No Conflict**. The Project would provide a variety of recreational amenities for use by hotel guests and visitors. Level B3 of the Hotel Expansion Building would include a 10,000-square foot spa open to hotel guests and up to 250 non-hotel guest private members. The Hotel Expansion Building would also provide an approximately 2,600 square foot fitness center on Level B1 for use by hotel guests. In addition, an approximately 9,000-square foot pool deck with a pool, foot jacuzzi, and outdoor seating would be located on Level 3; and a 3,500-square foot rooftop pool deck with a pool and outdoor seating would be provided on Level 17 of the Hotel Expansion Building. The Project's landscaping would include a comprehensive replacement and upgrade of landscaping throughout Level 3 consisting of green year- round plant palette with flowering trees and shrubs. In addition, the area between the Hotel Expansion Building, Existing Hotel Building, and Ancillary Hotel Building would be landscaped to create a green, multi-use open space. Landscaping would also be provided around the pool deck outdoor restaurant seating area on Level 17 of the Hotel Expansion Building. Level 17 would provide views of the Universal Studios theme park, CityWalk, and Verdugo Mountains to the east and the Hollywood Hills to the west. Thus, the Project would provide open space thereby contributing to the recreational, environmental and health needs of the community.
Objective 5-1: To preserve existing open space resources and where possible develop new open space.	**No Conflict.** The Project would not encroach upon public open space resources. As discussed above, the Project would provide a variety of recreational amenities for guests and visitors, including a spa, two pool decks, a gym, and a green, multi-use open space area on Level 3 between the Hotel Expansion Building, Existing Hotel Building, and Ancillary Hotel Building.
Chapter V. Urban Design	
Provide accenting, complementary building materials to building facades.	**No Conflict.** The Project would create a uniform architectural theme by incorporating structural elements and materials from the existing buildings on the Project Site and vicinity. The Hotel Expansion Building would incorporate materials such as clear and tinted glass, architectural precast panels, painted metal panels, tile and exterior plaster to complement the curvilinear aspect of the Existing Hotel Building. The Junior Ballroom/Meeting Room Addition would be constructed with materials such as pre-cast concrete panel, metal panels and stucco to provide a complimentary design to the Ancillary Hotel Building and Existing Hotel Building.

TABLE 4-1
PROJECT CONSISTENCY WITH APPLICABLE AESTHETICS POLICIES OF THE SHERMAN OAKS-STUDIO CITY-TOLUCA LAKE-CAHUENGA COMMUNITY PLAN

Objectives	Would the Project Conflict?
Screen of all rooftop equipment and building appurtenances from public view.	**No Conflict.** All equipment and mechanical building appurtenances would be screened from public view.
Require the enclosure of trash areas for all projects.	**No Conflict.** Trash/recycling collection areas would be located within the subterranean parking garage at Level 2 (P1) similar to existing conditions and would be screened from public view.
Design parking structure exteriors to match the style, materials, and color of the main building.	**No Conflict.** The Project Site currently includes a parking structure that is primarily below grade. Above-grade sections, visible from lower elevations are designed in terms of materials and color, to complement the Existing Hotel Building. The Project would expand the parking structure, but the expanded areas would not visible to public view above grade.
Install on-site lighting along all pedestrian walkways and vehicular access ways.	**No Conflict.** Pedestrian lighting would be provided along all pedestrian walkways and the driveway entrance driveway.

In addition to general aesthetics-related policies, Chapter V, Urban Design, of the Community Plan primarily establishes a minimum level of design. Many of the policies in Chapter V are intended to orient commercial structures along the main commercial street, such as maximizing retail and commercial uses along the street frontages, and to scale new buildings to the pedestrian scale along the sidewalk and to enhance the streetscape. Because the Project's improvements within the Hotel Property are not directly along a street frontage or public sidewalk, aside from the Hotel entrance driveway, policies specific to street-level glazing, direct sidewalk entrances, building height relative to the sidewalk, and similar policies would not be applicable. However, Chapter V policies related to building materials, parking structures, landscaping, and light and glare are applicable and are included in the table discussion below. As shown in Table 4-1, the Project would not conflict with the goals of the Community Plan to enhance the visual character of the Project Site, and to provide on-site open space and landscaping. As such, aesthetic impacts with respect to this plan would be less than significant.

Overall, the Project would comply with applicable tree replacement requirements, existing lighting and signing regulations of the LAMC, and policies of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Community Plan. In addition, pursuant to PRC Section 21099(d)(1) and ZI No. 2452, impacts on aesthetics from a residential mixed-use or employment center project, such as the Project, located within a TPA shall not be considered significant impacts on the environment. Thus, impacts with respect to consistency with regulations that govern scenic quality would be less than significant.

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

Less Than Significant Impact. The Project vicinity is highly urbanized. The Hotel Expansion Building would be located in the proximity of three existing high-rise commercial buildings and across Universal Hollywood Drive from Universal Studios theme park and CityWalk. The south

side of the Project Site faces the Hollywood Freeway, which is a source of potential nighttime lighting and daytime glare. At night, the surrounding development typically generates moderate to high levels of interior and exterior lighting to support the entertainment and retail uses of Universal City, and for security, parking, signage, architectural lighting, and landscaping/decorative purposes. Street lights and traffic on Lankershim Boulevard, the Hollywood Freeway, and the Cahuenga/Ventura Boulevard corridor generate high levels of artificial light sources typical of major streets and highways in Southern California.

Lighting is regulated by various chapters within the LAMC. Applicable regulations for the Project Site include the following:

- Chapter 1, Article 2, Section 12.21 A 5(k). All lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any streets and adjacent premises.
- Chapter 1, Article 7, Section 17.08 C. Plans for street lighting shall be submitted to and approved by the Bureau of Street Lighting for subdivision maps.
- Chapter 1, Article 4.4, Section 14.4.4. No sign shall be arranged and illuminated in a manner that will produce a light intensity of greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.
- Chapter 9, Article 3, Section 93.0117(b). No exterior light may cause more than two foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors on any property containing residential units; elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units.

The Project would be designed to maintain similar levels and types of outdoor lighting as under existing conditions. Accent and security lighting similar to that currently in use on the Hotel Property, such as sconces, architectural lighting, and low-level landscaping lighting, would be installed on the new buildings. Indirect light would highlight the roof canopy at ground level, and the rooftop of the Hotel Expansion's Building would include accent lighting. The outdoor bar area would include low-level lighting for guests. All exterior utility lighting over doors and along roadways would be low wattage, low-level, full cutoff luminaries to contain light within the Project Site. All lighting would be shielded and directed to minimize exposure onto neighboring properties. The use of pole mounted lighting or floodlights are not proposed. In addition, per LAMC Section 12.21 A 5(k), all lights used to illuminate parking would be designed, located and arranged so as to reflect the light away from any streets and adjacent premises.

The Project would retain the existing red, channel-letter "Hilton" sign atop the Existing Hotel Building's northwestern and southeastern façades. New identification and wayfinding signage at the driveway entrance along Universal Hollywood Drive would be provided. Also, new wayfinding signage would be added to the interior of the Project Site to assist guests and visitors on finding the entrance to the on-site buildings. No off-site advertising signage is proposed. All signage would be developed consistent with LAMC Section 14.4.4.

Some Project lighting elements may be visible from nearby off-site vantages, including the residential uses in the foothills of the Hollywood Hills south and west of the Project Site. The nearest residential area is located approximately 0.14 mile or 740 feet south of the Project Site and separated from the Project Site by the Hollywood Freeway and Cahuenga Boulevard. Due to

the distances of the closest neighborhoods from the Project Site and relatively high ambient light in the area, the Project would not generate an exceptional light source that would visibly increase ambient light levels or conflict with LAMC section Sections 14.4.4 or Section 93.0117(b).

A plan for any new street lighting would be submitted to and must be approved by the Bureau of Street Lighting to ensure that adjacent properties would not be adversely impacted in accordance with City standards. In addition, all proposed illuminated signs would be reviewed by the City to ensure that lighting would not produce a light intensity of greater than three foot-candles above ambient lighting at the property line of the nearest residentially zoned property. Overall, all lighting and signage would be developed in compliance with applicable LAMC requirements.

Daytime building glare occurs when the reflective surface is in front of a viewer with the glare source (the sun) behind or within the same line of sight as the viewer. In general, glare affects west-facing viewers or west-bound drivers in the morning hours, east-facing viewers or east-bound drivers in the afternoon hours, and north-facing viewers or northbound drivers during certain seasons when the sun is lower on the horizon. Daytime glare is more serious if it interferes with a driver's vision and ability to operate a motor vehicle. The Hotel Expansion Building would be visible to drivers on the Hollywood Freeway. Although the Hotel Expansion Building could provide substantial windows, the use of glass on its narrower east and west walls would be limited. In addition, a surface grid patterned glass would reduce the potential for large reflective surfaces and substantially reduce any significant potential glare experienced by drivers on the adjacent freeway. Further, glass used in building façades would not use mirror coatings to minimize glare. Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements would be permitted. However, prior to issuance of a building permit, the City of Los Angeles Department of Building and Safety (LADBS) would review the exterior building materials to confirm that they do not exceed the reflectivity of standard building materials, ensuring the Project would not cause significant glare impacts on motorists or nearby residential uses. Nighttime glare could occur if the direct light source were visible to surrounding residential neighborhoods. Under LAMC Section 93.0117(b), no exterior light may cause more than two foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors, or habitable porch, deck, or balcony on any property containing residential units. As required, the Project would implement indirect wall lighting or cutoff lights, which do not allow a visible light source and would not increase the ambient light levels by more than two foot candles at any adjacent land uses. Therefore, the Project would not cause substantial nighttime glare with respect to residential or hotel neighborhoods in the area.

Overall, the Project would not generate light or glare that would substantially adversely affect views in the area. Furthermore, pursuant to PRC Section 21099(d)(1) and ZI No. 2452, light and glare impacts from a residential mixed-use or employment center project, such as the Project, located within a TPA shall not be considered significant impacts on the environment. Impacts would be less than significant.

II. AGRICULTURE AND FORESTRY RESOURCES

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

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

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

No Impact. The Project Site is currently developed with buildings containing hotel-related uses and associated supporting infrastructure. No agricultural uses or related operations are present on the Project Site or in the surrounding urbanized area. Furthermore, the Project Site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program.[8] Since the Project would not convert farmland to non-agricultural uses, there would be no impacts, and no mitigation measures would be required. No further analysis of this topic in an EIR is required.

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

No Impact. Per the City's Zimas website, the Project Site is designated for Regional Center Commercial land use. The Project Site's zoning designations include C2-1 (Commercial zone), PB Zone (parking zone), and RE-15-H (Residential Estate zone). No agricultural zoning designations are present in the Project vicinity, and no nearby lands are enrolled under the Williamson Act.[9] As such, the Project would not conflict with existing zoning for agricultural uses or a William Act contract, and there would be no impact. No mitigation measures would be required. No further analysis of this topic in an EIR is required.

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

No Impact. As discussed in Response to Checklist Question II.b, the Project Site's zoning designations include C2-1 (Commercial zone), PB Zone (parking zone), and RE-15-H (Residential Estate zone), which are commercial-related and residential zones. The Project Site is currently developed with hotel-related uses and associated infrastructure and does not contain any forest land or timberland. Furthermore, the Project vicinity is urbanized and zoned primarily for commercial uses. There are no forest land, timberland, or land zoned for timberland production in the surrounding area. As such, the Project would not conflict with existing zoning for forest land or timberland, and there would be no impacts. No mitigation measures would be required and no further analysis of this topic in an EIR is required.

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

No Impact. As previously discussed, the Project Site consists of hotel-related uses and associated infrastructure surrounded by urban development. No forest land exists on the Project Site or in the Project vicinity. As such, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. There would be no impacts and no mitigation measures would be required. No further analysis of this topic in an EIR is required.

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8 California Department of Conservation, California Important Farmland Finder, ftp://ftp.consrv.ca.gov/ pub/ dlrp/FMMP/ pdf/2016/los16.pdf, accessed January 22, 2020.

9 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 555 E. Universal Hollywood Drive, http://zimas.lacity.org/, accessed January 22, 2020.

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

No Impact. As previously discussed, there are no agricultural uses or related operations on or near the Project Site. Therefore, the Project would not involve the conversion of farmland to other uses, either directly or indirectly. No impacts to agricultural land or uses would occur and no mitigation measures would be required. No further analysis of this topic in an EIR is required.

III. AIR QUALITY

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

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

a. Conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact. The Project Site is located within the 6,600-square-mile South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) together with the Southern California Association of Government (SCAG) is responsible for formulating and implementing air pollution control strategies throughout the Basin. The current Air Quality Management Plan (AQMP) was adopted March 3, 2017, and outlines the air pollutions control measures needed to meet federal particular matter ($PM_{2.5}$) and ozone (O_3) standards. The AQMP also proposes policies and measures currently contemplated by responsible agencies to achieve federal standards for healthful air quality in the Basin that are under SCAQMD jurisdiction. In addition, the current AQMP addresses several federal planning requirements and incorporated updated emissions inventories, ambient measurements, meteorological data, and air quality modeling tools from earlier AQMPs.

The Project would increase the amount of operational air emissions, which could affect implementation of the AQMP due to increased traffic and energy consumption, including potential increases in the amounts of gas and electricity needed to support the Project. Pollutant emissions resulting from construction of the Project could also have the potential to affect implementation of the AQMP. Therefore, the EIR will provide further analysis of potential impacts to implementation of the AQMP.

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

Potentially Significant Impact. The Project Site is located within the Basin, which is characterized by relatively poor air quality. According to the AQMP, the Basin is designated nonattainment for federal and state O_3 standards, as well as the current PM_{10} and $PM_{2.5}$ standards. The Los Angeles County portion of the Basin is also designated a nonattainment area for the federal lead (Pb) standard on the basis of source-specific monitoring at two locations, as determined by the U.S. Environmental Protection Agency (EPA) using 2007 through 2009 data. However, all other stations in the Basin, including the near-source monitoring in Los Angeles County, have remained below the lead National Ambient Air Quality Standards (NAAQS) for the 2012 through 2015 period. SCAQMD is therefore requesting that the EPA re-designated the Los Angeles County portion of the basin as attainment for lead.

The Project would result in increased air emissions from construction and operational traffic in the Basin, within an air quality management area currently in non-attainment of federal and state air quality standards for O_3, PM_{10}, and $PM_{2.5}$. As such, implementation of the Project could potentially contribute to cumulatively significant air quality impacts, in combination with other existing and future emission sources in the Project area. Therefore, the EIR will provide further analysis of potential cumulative impacts associated with an increase in criteria pollutants.

c. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. The Project Site is located in the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan Area in the City of Los Angeles, which includes residential and other sensitive uses in the Project vicinity. Construction activities and operation of the Project could increase air emissions above current levels. Therefore, the EIR will provide further analysis of potential impacts associated with the exposure of sensitive receptors to substantial pollutant concentrations.

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

Less Than Significant Impact. As discussed under Response to Checklist Questions III.a-c, construction and operational emissions generated by the Project will be evaluated in the EIR. Objectionable odors are typically associated with industrial activities involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. Odors are also associated with such uses as sewage treatment facilities and landfills. The Project includes new facilities and structures within the Project Site that would not introduce any major odor-producing uses that would have the potential to affect a substantial number of people. Activities and materials associated with construction would be typical of construction projects of similar type and size. On-site trash receptacles would be

covered and properly maintained in a manner that promotes odor control. Any odors that may be generated during construction of the Project would be localized and would not be sufficient to affect a substantial number of people or result in a nuisance as defined by SCAQMD Rule 402. Odors associated with Project operation would be limited to those typical activities associated with on-site waste generation and disposal (e.g., trash cans, dumpsters) and occasional minor odors generated during food preparation activities. Thus, Project operation is not expected to create substantial objectionable odors. Impacts with regard to odors would be less than significant and no mitigation measures would be required. No further analysis of this topic in an EIR is required.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☒	☐	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☒	☐	☐	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Potentially Significant Impact. While the Project Site is currently developed, the eastern and southern peripheries of the Project Site include vegetated areas and trees that could potentially support special status species identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. The EIR will evaluate such potential impacts based on a records search of biological resources databases and a field investigation to identify existing and potential species that could be impacted by the Project.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. As discussed in the response to Checklist Question IV.a above, the Project Site consists entirely of developed areas and/or ornamental landscaping. Based on a biological survey of the Project Site, the Project Site does not contain any riparian habitat or other sensitive natural communities as indicated in the City or regional plans or in regulations by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). Furthermore, the Project Site is not located in or adjacent to a Significant Ecological Area (SEA).[10] Therefore, the Project would not have an adverse effect on any riparian habitat or other sensitive natural community and no mitigation measures would be required. No further analysis of this topic in an EIR is required.

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

No Impact. As previously discussed, the Project Site is located within an urban area and consists entirely of developed areas and/or ornamental landscaping. The Project Site does not contain wetlands as defined by Section 404 of the Clean Water Act. Therefore, the Project would not have an adverse effect on federally protected wetlands and no mitigation measures would be required. No further analysis of this topic in an EIR is required.

[10] Los Angeles County website. http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf. and planning and zoning information GIS info. for SEA areas at http://planning.lacounty.gov/gisnet3/Viewer.html, Accessed January 22, 2020.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Potentially Significant Impact. As the Project Site is fully developed, no water bodies that could serve as habitat for fish exist on the Project Site. Furthermore, the Project Site and adjacent areas do not contain native wildlife nursery sites. However, because the Project Site includes a number of mature trees, it could support nesting or migratory birds. The extent to which birds or other wildlife could be impacted by the Project will be further evaluated in an EIR. The EIR will identify what type of wildlife may use the Project Site for nesting or migratory purposes, and will determine the extent to which the Project may directly affect native nursery sites, or otherwise substantially interfere with the movement of native resident or migratory wildlife species or with established native resident or migratory wildlife corridors.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

Less than Significant Impact. As stated in the response to Checklist Question IV.a above, the Project Site is developed with hotel-related uses and associated infrastructure. A Tree Report was prepared by Carlberg Associates in August 2020, which is included as Appendix A to this Initial Study. "Significant" trees are defined by the City of Los Angeles Planning Department as any tree with a trunk diameter of eight inches or larger. The City of Los Angeles Tree Preservation Ordinance No. 177,404 defines "protected" trees as coast live oak, western Sycamore, Southern California black walnut, or California bay laurel with trunk diameters of four inches or greater. Per the Tree Report, the area of the Project Site (excluding the approximately 14,000 square-foot "L-shaped" portion off of northwest corner of North Plaza) contains a total of 214 trees, with an additional eight trees located off-site in the vicinity of the potential future pedestrian improvements. Of these 222 trees (both on- and off-site), none are City of Los Angeles "protected" trees, 97 are considered City of Los Angeles "significant" trees, and 125 are neither "significant" or "protected" trees. The Project would remove a total of 180 trees from the Project Site, including 71 "significant" trees and 107 trees that are neither "significant" or "protected." Species of trees on the Project Site include: Flooded gum, Red river gum, Aleppo pine, Red ironbark, Mexican fan palm, Brazilian pepper, Mediterranean fan palm, Pygmy date palm, Canary Island date palm, Chinese elm, umbrella tree, Brisbane box, weeping fig, Sydney golden wattle, Moreton Bay fig, floss silk, New Zealand Christmas tree, American sweetgum, Indian laurel, California pepper, and queen palm. If the potential future off-site pedestrian improvement shown on Figure 3-4 were to be implemented, four additional trees may need to be removed (depending on the final alignment), for a total of 184 trees removed in association with the Project. Of these four trees located off-site, three are "significant" and one is neither "significant" or "protected."

Project landscaping would comply with all tree replacement requirements pursuant to the Department of City Planning and/or the City's Urban Forestry Division. Typically, the replacement ratio is 1:1 for significant trees with minimum 24-inch box specimen size. Specifications on the types of trees and sizes for the replacement trees would be provided by the landscape architect during plan check and impacts to "significant" trees would be less than significant.

As indicated above, none of the trees that would be removed are considered "protected" by the City of Los Angeles Tree Preservation Ordinance No. 177.404. As such, no locally protected biological resources, such as oak trees or California walnut woodlands, or other trees protected

under the City of Los Angeles Protected Tree Ordinance (Chapter IV, Article 6 of the LAMC) exist on the Project Site or in the adjacent street right-of-ways. Thus, impacts to "protected" trees would be less than significant. Therefore, the Project would not conflict with local policies or ordinances protecting biological resources such as a tree preservation policy or ordinance. Impacts would be less than significant and no mitigation measures are required. No further analysis of this topic in the EIR is required.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Project Site is not located within a habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan.[11],[12] The Project would not conflict with the provisions of any adopted conservation plan. Therefore, no impacts would occur and no mitigation measures would be required. No further analysis of this topic in an EIR is required.

V. CULTURAL RESOURCES

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

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

Potentially Significant Impact. A historical resource is defined in Section 15064.5(a)(3) of the State CEQA Guidelines as any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural

[11] California Department of Fish and Wildlife, Habitat Conservation Planning Branch, Natural Community Conservation Plans (NCCPs) Summaries, California Regional Conservation Plans Map, October 2017 and Summary of NCCPS, October 2017. Available at: https://www.wildlife.ca.gov/Conservation/Planning/NCCP/Plans. Accessed on January 22, 2020.

[12] U.S. Fish and Wildlife Service (USFWS), Conservation Plans Database, Region 8, https://ecos.fws.gov/ecp0/conservationPlan/, accessed January 22, 2020.

annals of California. Historical resources are further defined as those associated with significant events, important persons, or distinctive characteristics of a type, period or method of construction; representing the work of an important creative individual; or possessing high artistic values. Resources listed in or determined eligible for the California Register, included in a local register, or identified as significant in a historic resource survey are also considered historical resources under CEQA.

The Project Site contains the 24-story, Existing Hotel Building and the attached Ancillary Hotel Building providing meeting/banquet rooms and ancillary hotel uses. The Existing Hotel Building was built in 1983 for the Sheraton Company, and was designed by master architect William L. Pereira. The EIR will analyze this building to determine if it qualifies as a historical resource under CEQA. As part of this effort, a historic resources survey and research will be conducted to document the extent of alterations and additions to the Existing Hotel Building and to assess its integrity and architectural merit to qualify as a historical resource. The evaluation of the Existing Hotel Building will also include focused research on the importance of the building in the career of architect William L. Pereira, and archival records on the design of the Hotel located at USC Libraries Special Collections at the Doheny Memorial Library, as necessary for the property evaluation. Although the existing Ancillary Hotel Building would only be subject to minor alterations to the current entryway and as part of a connection to the proposed new entry-level (Level 3) lobby associated with the Hotel Expansion Building, the EIR analysis will determine if the existing buildings qualify as a potential historical resource, and if so, the analysis will include an assessment of potential direct and indirect effects.

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

Potentially Significant Impact. Section 15064.5(a)(3)(D) of the State CEQA Guidelines generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. The Project Site is currently developed with buildings, surface parking and ornamental landscaping. However, because of the age of some of the on-site improvements, and the potential that grading or excavation at the time of prior construction was limited, the potential existence of extant archaeological resources is unknown. Project construction would require grading and excavation activities for building foundations that could extend into native soils and could disturb existing but as yet undiscovered archaeological resources. Therefore, this topic will be analyzed further in an EIR to determine the potential for, and significance of, any impacts on archaeological resources.

c. Disturb any human remains, including those interred outside of dedicated cemeteries?

Less than Significant Impact. As previously indicated, the Project Site is fully developed. Nevertheless, the Project Site would require excavation to an approximate depth of 50 feet that could extend into native soils, with the potential to encounter previously undiscovered human remains. A number of regulatory provisions address the handling of human remains inadvertently uncovered during excavation activities. These include State Health and Safety Code Section 7050.5, Public Resources Code (PRC) Section 5097.98, and State CEQA Guidelines Section 15064.5(e). Pursuant to these codes, in the event of the discovery of

unrecorded human remains during construction, excavations shall be halted and the County Coroner shall be notified. If the human remains are determined to be Native American, the California Native American Heritage Commission shall be consulted to designated a Most Likely Descendent who shall recommend appropriate measures to the landowner regarding treatment of the remains. Compliance with these regulatory protocols would reduce impacts to a less than significant level. No mitigation measures would be required and no further analysis of this topic in the EIR is required.

VI. ENERGY

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

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

Potentially Significant Impact. Energy resources, including electricity and natural gas, would be consumed to construct and operate the Project. The demand would be largely supplied from existing infrastructure in the vicinity of the Project Site. An assessment regarding the Project's energy demand will be further assessed in the EIR.

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

Potentially Significant Impact. Construction and operation of the Project would generate additional demand for the use of energy that could conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, impacts are considered potentially significant and this issue will be further analyzed in an EIR.

VII. GEOLOGY AND SOILS

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

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

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

Potentially Significant Impact. The seismically active region of Southern California is crossed by numerous faults. A fault is a fracture in the crust of the earth along which rocks on one side have moved relative to those on the other side. Most faults are the result of repeated displacements over a long period of time. A fault trace is the line on the earth's surfacing defining the fault. Fault rupture is the displacement that occurs along the surface of a fault during an earthquake. The California Geological Survey (CGS) has established earthquake fault zones known as Alquist-Priolo Earthquake Fault Zones around the surface traces of active faults to assist cities and counties in planning, zoning, and building regulation functions. These zones identify areas where potential surface rupture along an active fault could prove hazardous and identify where special studies are required to characterize hazards to habitable structures. In addition, the City's General Plan Safety Element (1996) has designated fault rupture study areas extending along each side of active and potentially active faults to establish areas of hazard potential due to fault rupture.

The Project Site is not located with an Alquist-Priolo Earthquake Fault Zone; however, the Hollywood Fault, located approximately 0.01 miles from the Project Site.[13] A site-specific geotechnical evaluation is being prepared for the Project Site which will fully assess the potential for seismic-related impacts, including those from fault-rupture. Since the Project Site is located within the seismically active Southern California region and near the Hollywood Fault, the Project could expose people or structures to substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. In order to adequately address these conditions, this topic will be analyzed further in the EIR. The results of the geotechnical evaluation will be included in the EIR.

ii. Strong seismic ground shaking?

Potentially Significant Impact. The Project Site is located within the seismically active Southern California region and in close proximity to the Hollywood Fault. Thus, the Project Site would be subject to shaking during earthquake events. The level of ground shaking that would be experienced at the Project Site from faults in the region would be a function of several factors including earthquake magnitude, type of faulting, rupture propagation path, distance from the epicenter, earthquake depth, duration of shaking, site topography, and site geology. Faults that could produce shaking at the Project Site include the Hollywood Fault, Whittier-Elsinore Fault, San Jacinto Fault, San Andreas Fault and numerous other smaller faults found throughout the region. As with any new development in California, Project building design and construction would be required to conform to the current seismic design provisions of the City's Building Code, which incorporates relevant provision of the 2019 California Building Code (CBC), which became effective on January 1, 2020. The 2019 CBC, as amended by the City's Building Code, incorporates the latest seismic design standards for structural loads and materials to provide for the latest in earthquake safety. Nonetheless, a site-specific geotechnical evaluation is being prepared for the Project Site which will fully assess the potential for seismic-related impacts,

[13] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 555 E. Universal Hollywood Drive, http://zimas.lacity.org/, accessed January 22, 2020.

including those from ground shaking. This topic will be analyzed further in the EIR. The results of the geotechnical evaluation will be included in the EIR.

iii. Seismic-related ground failure, including liquefaction?

Potentially Significant Impact. Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subject to high-intensity ground shaking. Liquefaction occurs when the shock waves from an earthquake of sufficient magnitude and duration compact and decrease the volume of the soil; if drainage cannot occur, this reduction in soil volume will increase the pressure exerted on the water contained in the soil, forcing it upward to the ground surface. This process can transform stable soil material into a fluid-like state. This fluid-like state can result in horizontal and vertical movements of soils and building foundations from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Liquefaction occurs when three general conditions exist: 1) shallow groundwater; 2) low density non-cohesive (granular) soils; and 3) high-intensity ground motion.

According to the City's ZIMAS website, the Project Site is not located in a City-designated liquefaction zone. Therefore, the potential for liquefaction to occur at the Project Site is considered to be low. However, with the Project Site being located in an area of potentially high seismic activity, the potential for liquefaction will be analyzed further in the EIR. A site specific geotechnical evaluation is being prepared for the Project Site which will fully assess the potential for seismic-related ground failure, including liquefaction. The results of the geotechnical evaluation will be included in the EIR.

iv. Landslides?

Potentially Significant Impact. The Project Site is located within a City-designated landslide area.[14] The Project Site occupies a promontory that descends moderately to the west, south, and east at a grade of approximately 50 percent (2:1 horizontal-to-vertical gradient). The Project Site contains an engineered hillside that would be partially excavated and graded to accommodate development of the Project. Since the Project Site is subject to potentially high seismic activity (see Checklist Questions VII(a)i to VI(a)ii above) and up to approximately 70,000 cubic yards of soil would be excavated for construction of the Project, a site-specific geotechnical evaluation is being prepared for the Project Site which will fully assess the potential for landslides.

The EIR analysis will identify the Project's potential to directly or indirectly cause potential adverse effects due to landslides. The results of the geotechnical evaluation will be included in the EIR.

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

Potentially Significant Impact. During construction, the Project Site would be subject to ground-disturbing activities (e.g., excavation, grading, soil stockpiling, foundation construction, the installation of utilities). These activities would expose soils for a limited time, allowing for possible erosion. In addition, the post-construction change in on-site drainage patterns resulting from the Project could also result in limited soil erosion. Thus, the EIR will provide further analysis of the potential for soil erosion resulting from Project construction and operation.

[14] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 555 E. Universal Hollywood Drive, http://zimas.lacity.org/, accessed January 22, 2020.

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

Potentially Significant Impact. As previously discussed in Responses to Checklist Questions VII.a.iii and a.iv above, liquefaction and landslide hazards were concluded to be potentially significant. Subsidence occurs when a void is located or created underneath a surface, causing the surface to collapse. Common causes of subsidence include withdrawal of groundwater or oil resources or wells beneath a surface. As no oil wells are located on or near the Project Site, subsidence associated with extraction activities is not anticipated.[15] Nevertheless, the Project Site is subject to potentially high seismic activity. Therefore, the EIR will provide further analysis of potential impacts related to soil stability hazards. A site-specific geotechnical evaluation is being prepared for the Project Site which will fully assess the potential for seismic-related impacts, including those from unstable soils. The results of the geotechnical evaluation will be included in the EIR.

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

Potentially Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. A site-specific geotechnical evaluation is being prepared for the Project Site which will fully assess the potential for expansive soils. The results of the geotechnical evaluation will be included in the EIR.

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

No Impact. The Project Site is located in an urbanized area where wastewater infrastructure is currently in place. The Project would connect to existing infrastructure and would not use septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur and no mitigation measures would be required. No further analysis of this topic in an EIR is required.

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

Potentially Significant Impact. The Project Site is developed with hotel-related uses and associated infrastructure. Although the Project would not directly or indirectly destroy a unique geologic feature, grading and excavation to a maximum depth of approximately 50 feet below grade would be required to expand the subterranean parking garage, which could result in the unanticipated discovery of paleontological resources. Therefore, this topic will be analyzed further in an EIR to determine the potential for, and significance of, any impacts on paleontological resources.

[15] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 555 E. Universal Hollywood Drive, http://zimas.lacity.org/, accessed January 22, 2020.

VIII. GREENHOUSE GAS EMISSIONS

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

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

Potentially Significant Impact. Construction and operation of the Project would increase greenhouse gas (GHG) emissions which have the potential to either individually or cumulatively result in a significant impact on the environment. In addition, the Project would generate vehicle trips that would contribute to the emission of GHGs. The amount of GHG emissions associated with the Project has not been estimated at this time. Therefore, this topic will be further evaluated in the EIR and include a quantitative assessment of Project-generated GHG emissions resulting from construction equipment, vehicle trips, electricity and natural gas usage, and water conveyance. Relevant Project features that reduce GHG emissions, such as green building design, will also be discussed in the EIR.

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

Potentially Significant Impact. The Project would be required to comply with the City's Green Building Code pursuant to Chapter IX, Article 9, of the LAMC. In conformance with these requirements, the Project would be designed to reduce GHG emissions through various energy conservation measures. In addition, the Project is required to implement applicable energy conservation measures to reduce GHG emissions such as those described in California Air Resources Board Assembly Bill (AB) 32 Scoping Plan, which describes the approaches California will take to achieve the goal of reducing GHG emissions to 1990 levels by 2020. The Project would incorporate sustainable elements of design during construction and operation. However, the amount of GHG emissions associated with the Project have not been estimated at this time. Therefore, further evaluation of this topic will be included in the EIR to determine if the Project would conflict with applicable plans, policies or regulations adopted for the purpose of reducing GHG emissions, including the Southern California Association of Governments' 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy.

IX. HAZARDS AND HAZARDOUS MATERIALS

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

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

Less Than Significant Impact. Construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Furthermore, any emissions from the use of such materials would be minimal and localized to the Project Site.

Operation of the Project would involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, and pesticides for landscaping. The use of these materials would be in small quantities and in accordance with the manufacturers' instructions for use, storage, and disposal of such products. As with construction, any emissions from the use of such materials related to the operation of the Project would be minimal and localized to the Project Site

Therefore, neither construction nor operation of the Project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and no mitigation measures would be required. No further analysis of this topic in an EIR is required.

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

Less Than Significant Impact. Project construction activities would result in a temporary increase in the use of typical construction materials at the Project Site, including concrete, hydraulic fluids, paints, cleaning materials, and vehicle fuels. The use of these materials during Project construction would be short-term in nature and would occur in accordance with standard construction practices, as well as with applicable federal, state, and local regulations. Potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations.

A Phase I Environmental Site Assessment (Phase I ESA) was prepared by Geosyntec Consultants in February 2020 (included in Appendix B of this Initial Study) to identify, to the extent feasible, "Recognized Environmental Conditions" (RECs) at the Project Site as defined by ASTM E 1527-13.[16] This REC definition eliminates from consideration several conditions that could fall under the general definition of "environmental issues" and focuses on known or potential releases of hazardous substances and petroleum products.

As discussed in the Phase I ESA, the Project Site was undeveloped until sometime between 1964 and 1970 when it was developed into a paved surface parking area for the nearby Universal Studios Hollywood theme park. In 1982, the Project Site was developed with the current Hotel improvements, and operated as the Sheraton Premier Towers. Circa 1990, the Project Site was sold and the Hotel was rebranded as the existing Hilton Universal City Hotel. Dry-cleaning,

[16] As defined by ASTM E 1527-13, a Recognized Environmental Condition is: "the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. *De minimis* conditions are not recognized environmental conditions."

including the use of tetrachloroethene (PCE), was formerly performed within the Project Site until approximately 2003. The location of the former dry cleaning site was near the northernmost portion of the Existing Hotel Building, and not within any areas proposed for development or renovation as part of the Project. A limited soil vapor survey performed in 2009 near the former dry cleaning facility identified relatively low concentrations of PCE and other volatile organic compounds (VOCs) in soil vapor; however, impacts appeared to be localized to the vicinity of the former dry cleaning facility and attenuate laterally. The soil vapor survey concluded that it is unlikely that a significant release had occurred, and that additional investigation was not warranted. Based on the distance of the former on-site dry cleaning facility from the proposed Project improvements, no significant impacts from the former dry cleaning operations would occur with respect to Project construction or operation.

An Historical Recognized Environmental Condition (HREC) as defined by the ASTM Standard E1527-13 is, "…a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls)."

Two underground storage tanks (USTs) formerly containing diesel fuel were removed on May 14, 2004, from an area along the southern Project Site boundary near the terminus of the hotel service road that runs along the eastern perimeter of the Project Site. During removal of the USTs, evidence of a release was observed. Over-excavation of the UST cavity was performed to a depth of 17.5 feet below ground surface (bgs), and approximately 166 tons of impacted soil was disposed of offsite. However, residual concentrations of VOCs and petroleum hydrocarbons were permitted to remain in place to naturally attenuate. Case closure was granted by the City of Los Angeles Fire Department on July 27, 2007, and residual concentrations left in place have likely continued to attenuate below soil screening levels. As of the date of the Phase I ESA, impacted soil concentrations reported are below the San Francisco Bay Regional Water Quality Control Board Environmental Screening Levels (ESLs) for Direct Exposure Human Health Risk Levels, Residential Shallow Soil Exposure.[17] Therefore, the USTs are considered an HREC and would not result in a significant impact with respect to Project construction or operation.

A group of buried transfer pipelines is located near the eastern portion of the Existing Outdoor Pool Area which formerly conveyed diesel fuel to the fire pump room located in/near the parking structure. During removal of the USTs in 2004 under Los Angeles City Fire Department (LAFD) Division Five Permit No. 11419, it was determined that abandonment in-place was appropriate for the transfer piping based on the proximity to the swimming pool and the overlying concrete pool deck. Therefore, under permit with the City of Los Angeles, the pipelines were flushed with a solution of Simple Green all-purpose cleaner, and plugged with a cement grout. Complications were reported to have occurred during grouting of the pipes due to clogging; however, the ends were sufficiently sealed to the satisfaction of the City inspector. Although residual concentrations of fuel may be present in the pipelines, the abandonment was performed to the satisfaction of the LAFD, and no evidence of a significant release from the transfer pipelines was reported. Case closure was granted by the City of Los Angeles Fire Department on 27 July 2007. Therefore, these pipelines are considered an HREC. Regardless, should these pipelines be removed during construction,

[17] The ESLs, which are published by the SF-RWQCB, are the most commonly referenced screening levels for petroleum hydrocarbons throughout California, including within the LARWQCB area.

their handling, removal and disposal would occur in accordance with applicable regulatory requirements for removal of such pipelines as required by the applicable regulatory agencies [e.g., California Department of Toxic Substances (DTSC), Los Angeles Regional Water Quality Control Board (LARWQCB), SCAQMD, etc.] as well as standard construction requirements required by the City of Los Angeles Building Code. Further, compliance with applicable State of California, Division of Occupational Safety and Health (Cal/OSHA), would provide safety and protective measures for construction workers involved in any pipeline removal. Because only residual fuel concentrations are expected to be potentially present in the pipelines and there is no evidence of significant release from the pipelines, compliance with the applicable regulatory requirements would ensure that any pipeline handling, removal, and disposal would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. The Project Site is listed in various hazardous materials databases because of the Hotel's current use of small quantities of hazardous materials typical of most hotel operations (i.e., petroleum/oil associated with hotel elevators) and due to the REC and HREC conditions discussed above.[18] However, listing in the databases alone is not an indication that a hazardous materials impact has or will occur. Listing in such databases may simply be an indication of a past condition that has been remediated satisfactory to the applicable agencies standards, as is the case for the above discussed REC/HRECs; or an indication that small quantities of hazardous materials are used on a site. None of the listings for the Project Site are indicative of a current REC that would result in the potential for a significant hazardous materials impact to the Project during construction or operation.

In addition, no off-site conditions are known that could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. As previously described, the Hotel is situated on a promontory and there is an overall elevation change of approximately 37 feet across the Project Site. Per the Phase I ESA, based on review of available information for the Project Site vicinity, topography, and geologic conditions, the direction of groundwater flow at the Project Site, is reasonably assumed to generally flow northerly toward the Los Angeles River. While there are properties within one mile of the Project Site that are identified with documented hazardous materials releases, due to the Project Site's location on a topographically elevated terrace, these properties are generally located topographically down-gradient from the Project Site and would not adversely affect Project construction or operation.

According to the City of Los Angeles ZIMAS website, the Project Site is not located within a methane hazard zone or methane buffer zone and no oils wells are located on the Project Site.[19] Thus, no methane hazards would occur at the Project Site.

As previously discussed, operation of the Project would involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, and pesticides for landscaping. The use of these materials would be in small quantities and in accordance with the manufacturers' instructions for use, storage, and disposal of such products.

[18] The Project Site is listed in databases that include HAZNET, Los Angeles Co. HMS, FINDS, CHMIRS, CA FID UST, RCRA-SQG, UST, SWEEPS UST, HIST UST, ECHO, and EMI databases searched by EDR. Please refer to the Phase ESA in Appendix B of this Initial Study for further details on these databases report results.

[19] Los Angeles Department of City Planning, ZIMAS Parcel Profile Report for 555 E. Universal Hollywood Drive, accessed January 22, 2020.

As with construction, any emissions from the use of such materials related to the operation of the Project would be minimal and localized to the Project Site.

Based on the above, neither construction nor operation of the Project would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. No further analysis of this topic in an EIR is required.

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

Less Than Significant Impact. The closest school to the Project is Huntly Preschool, located across the Hollywood Freeway approximately one-quarter mile southwest of the Project Site. The next nearest school, Rio Vista Elementary School, is located 0.80 miles northwest of the Project Site. Construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Any emissions from the use of such materials would be minimal and localized to the Project Site. Although Project construction may encounter previously identified on-site subsurface hazardous materials (see Response No. VIII.a), these materials are required to be handled in accordance with applicable regulations and would likely be localized to the Project Site. Existing schools are located at a sufficient distance (and with a barrier such as the Hollywood Freeway) from the Project Site and would not be significantly impacted if these materials are encountered during Project construction. Operation of the Project would involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, and pesticides for landscaping. The use of these materials would be consistent with current uses on the Project Site, would be in small quantities, and would be handled in accordance with the manufacturers' instructions for use, storage, and disposal of such products. As such, the Project would result in less than significant impacts regarding hazardous materials at any existing or proposed schools within a one-quarter mile radius of the Project Site. No mitigation measures would be required and no further analysis of this topic in an EIR is required.

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

Less Than Significant Impact. Government Code Section 65962.5, amended in 1992, requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a list of hazardous waste sites and other contaminated sites. While Government Code Section 65962.5 makes reference to the preparation of a list, many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the DTSC, the State Water Resources Control Board (SWRCB), and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions (such as a removal action) or extensive investigations are planned or have occurred. The database provides a listing of Federal Superfund sites [National Priorities List (NPL)]; State Response sites; Voluntary Cleanup sites; and School Cleanup sites. GeoTracker is the SWRCB's data management system for managing sites that impact groundwater, especially those that

require groundwater cleanup [USTs, Department of Defense, Site Cleanup Program] as well as permitted facilities such as operating USTs and land disposal sites. CalEPA's databased includes list of sites with active Cease and Desist Orders (CDO) or Cleanup and Abatement Orders (CAO) from the State Water Board.

Based on a recent review of the above referenced databases and a Phase I ESA, the Project Site is not listed as a hazardous materials site.[20,21,22,23] As such, impacts with regard to listing as a hazardous materials site would be less than significant. Further analysis of this issue is not required in the EIR.

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

No Impact. The Project Site is not within an airport land use plan and it is not within two miles of a public airport or public use airport. The nearest airport is the Burbank Bob Hope Airport, located approximately 3.75 miles north of the Project Site. Therefore, the Project would not result in an airport-related safety hazard or excessive noise for people residing or working in the Project vicinity. No impact would occur and no mitigation measures would be required. No further analysis of this topic in an EIR is required.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The Project Site is located in an established urban area that is well-served by a roadway network. Lankershim Boulevard, located 0.3 mile west of the Project Site's driveway entrance on Universal Hollywood Drive, is designated by the City as a Selected Disaster Route.[24] Other Selected Disaster Routes in the Project vicinity include the Hollywood Freeway, Ventura Boulevard, and Barham Boulevard. While it is expected that the majority of Project construction activities would be confined on-site, short-term construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. In these instances, the Project would implement traffic control measures (e.g., construction flagmen, signage, etc.) to maintain flow and access. Furthermore, in accordance with City requirements the Project would develop a Construction Management Plan, which includes designation of a haul route, to ensure that adequate emergency access is maintained during construction. Therefore, construction is not expected to result in inadequate emergency access.

Project operation would generate traffic in the Project vicinity, but would not require modifications to vehicle or pedestrian access (i.e., new curb cuts or Project driveways) to the

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20 Department of Toxic Substances Control, Envirostor Database at https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,OPEN,FUDS,CLOSE&status=ACT,BKLG,COM,COLUR&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+(CORTESE), accessed January 22, 2020.

21 State Water Resources Control Board, GeoTracker Database at https://geotracker.waterboards.ca.gov/, accessed January 22, 2020.

22 State Water Board; Sites Identified With Waste Constituents Above Hazardous Waste Levels Outside The Waste Management Unit; online https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/SiteCleanup-CorteseList-CurrentList.pdf, accessed January 22, 2020.

23 CalEPA's List of Active CDO and CAO sites; online https://calepa.ca.gov/sitecleanup/corteselist/, accessed January 22, 2020.

24 City of Los Angeles Department of Planning General Plan Safety Element – Critical Facilities and Lifeline Systems, Exhibit H (November 26, 1996).

Project Site. Specifically, access to the Project Site would continue to be provided via the existing driveway entrance on Universal Hollywood Drive. Emergency vehicle access would also continue to be available via the existing service road along the eastern side of the existing buildings. As a result, emergency access to the Project Site and surrounding area would continue to be provided as under existing conditions. Additionally, input was sought from the LAFD during the initial design phase and the Project has been designed to incorporate the provided recommendations, including receding the western wall line further from the fire service road, to ensure adequate emergency access and to comply with City access requirements. Similarly, the Los Angeles Department of Transportation (LADOT) and Bureau of Engineering would review all design plans to ensure that there are no hazardous design features which would impede access to the Project Site. Review and approval of Project Site access and circulation plans by the City would ensure that the Project would not impair implementation or physically interfere with adopted emergency response or emergency evacuation plans. Since the Project Site is not located adjacent to, and would not cause an impediment along a City-designated emergency evacuation route, and the proposed Project would not impair implementation of the City's emergency response plan. Project impacts related to emergency response and evacuation plans would be less than significant impact. As such, no further evaluation of this topic in an EIR or mitigation measures are necessary.

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less Than Significant Impact. The Project Site is located in an urbanized area; however, undeveloped parcels in the Project vicinity are landscaped with native and ornamental vegetation. While no wildlands are present on the Project Site, the Project Site is located in a Very High Fire Hazard Severity Zone (VHFHSZ).[25] VHFHSZs are primarily located in the hilly and mountainous regions of the City of Los Angeles where wildland fires originating on brush-covered undeveloped hillsides can be affected by urban development, and vice versa. Development and access within VHFHSZs are regulated by LAMC Section 57.4908. While the provisions of LAMC Section 57.4908 primarily address undeveloped parcels, there are also provisions that prohibit open flames and smoking on developed parcels within a VHFHSZ, as enforced by posted signage, and require fire clearance areas be maintained around structures.

The urbanized nature of the Project Site and surrounding area, as well as Project's building materials would limit the potential for wildland fire hazards. Specifically, the Project would be constructed primarily of concrete, steel, and glass, and would limit the use of flammable building materials that could create a substantial fire risk. Additionally, the Project design would comply with existing City Fire Code and other fire safety requirements, and would include smoke/fire alarms, fully sprinklered indoor spaces, and irrigated landscaped areas, which would serve to reduce potential hazards related to structure fires (i.e., fires potentially ignited by wildland fires in the hillside areas to the south across the Hollywood Freeway). When considering the urbanized nature of the surrounding development, with implementation of the provisions of the LAMC and other recommendations of the LAFD during the design process, the Project would not expose

[25] City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 555 E. Universal Hollywood Drive, http://zimas.lacity.org/, accessed January 22, 2020. VHFHSZs are lands designated by the City of Los Angeles Fire Department pursuant to Government Code 51178 that were identified and recommended to local agencies by the Director of Forestry and Fire Protection (Cal Fire) based on criteria that includes fuel loading, slope, fire weather, and other relevant factors. These areas must comply with the Brush Clearance Requirements of the Fire Code.

people or structures to a significant risk involving wildland fires. Therefore, impacts related to the Project's location in a VHFHSZ would be less than significant. No further evaluation of this topic in an EIR and no mitigation measures are required. However, as discussed in Checklist Question XV(a) below, the adequacy of the existing fire flow infrastructure and the ability of the LAFD and Los Angeles County Fire Department (LACFD), to serve the Project will be evaluated in the EIR.

X. HYDROLOGY AND WATER QUALITY

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

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

Potentially Significant Impact. Construction of the Project would require earthwork activities, including grading and excavation of the Project Site. During precipitation events in particular, construction activities associated with the Project have the potential to result in the conveyance of exposed and stockpiled soils as well as other pollutants into municipal storm drains. Operational activities associated with maintenance activities, vehicular operations (i.e., oil and grease), landscaping, etc. could also produce pollutants that could enter into the storm drain system.

The Project would be required to implement a Stormwater Pollution Prevention Plan (SWPPP) during construction that includes Best Management Practices (BMPs) to reduce pollutants in stormwater runoff from the Project Site. During operation, the Project would be required to comply with the City's Low Impact Development (LID) Ordinance and Standard Urban Storm Water Mitigation Plan (SUSMP) requirements, which require the implementation of post-construction BMPs to preclude sediment and hazardous substances from entering stormwater flows. While these are expected to avoid significant impacts to water quality standards and waste discharge requirements, further analysis of water quality impacts will be provided in the EIR to evaluate potential impacts and identify appropriate design features and regulatory compliance mechanisms.

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

Less Than Significant Impact. The Los Angeles Department of Water and Power (LADWP) is the water purveyor for the City. Water is supplied to the City from three primary sources, including 57 percent purchased water from the Metropolitan Water District (Bay Delta 48 percent, Colorado River 9 percent), snowmelt from the Eastern Sierra Nevada Mountains via the Los Angeles Aqueduct (29 percent), local groundwater from the San Fernando groundwater basin (12 percent), as well as recycled water (2 percent).[26] Based on the City's most current Urban Water Management Plan (UWMP), between 2011 to 2015, LADWP had an average available water supply of roughly 550,130 acre-feet, with approximately 12 percent coming from local groundwater.[27] Groundwater levels in the City are actively maintained via spreading grounds and recharge. The Project does not propose groundwater withdrawal.

The Project Site is topographically elevated above the surrounding area. In three soil borings advanced as part of a December 2015 geotechnical investigation, groundwater seepage was encountered at depths of 41 to 52 feet bgs and was interpreted to be derived from coarse bedding layers and fractures within the underlying bedrock.[28] Project construction would require excavation to a maximum depth of approximately 50 feet below grade. Thus, groundwater seepage and/or groundwater could potentially be encountered during construction. While there is a potential for dewatering during construction, any dewatering would be limited in duration and

[26] Los Angeles Department of Water and Power: Facts and Figures. Available at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?_adf.ctrl-state=vw08di4pa_4&_afrLoop=204287298033638. Accessed January 22, 2022.

[27] Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, Exhibit ES-0, LADWP Supply Reliability FYE 2011-2015 Average, pg. ES-21.

[28] Geosyntec Consultants, Phase I Environmental Site Assessment, Universal Hilton Expansion, February 2020.

extent to only remove the necessary groundwater in the lower areas of the expanded subterranean parking garage. All dewatering activities, including disposal of removed groundwater, would be subject to applicable dewatering requirements set forth by the LARWQCB.

Under existing conditions, various landscaped areas are located throughout the Project Site. However, the Project Site is developed largely with impervious surfaces associated with buildings, circulation facilities, and other on-site improvements and does not currently provide a substantial opportunity for groundwater recharge. Under the Project, the proposed landscape improvements throughout the Project Site would not increase the amount of pervious surfaces or materially improve the groundwater recharge potential of the Project Site. With a limited opportunity on the Project Site for groundwater recharge under pre- and post-Project conditions, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Therefore, impacts would be less than significant and no mitigation measures would be required. No further analysis of this topic in an EIR is required.

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

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

Potentially Significant Impact. The Project Site is developed with hotel-related buildings and associated infrastructure. No streams are located within the Project Site or surrounding area. The Project would involve the demolition of existing features and site grading, construction of new buildings, and installation of new landscaping, which would have the potential to alter the existing drainage patterns on the Project Site. A hydrology analysis is being prepared to evaluate the potential for change in drainage patterns with Project implementation. The analysis will determine the Project's consistency with applicable drainage requirements in the City's SUSMP, LID Ordinance and Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494). The analysis will further disclose any potential hydrology impacts to determine if the Project would result in substantial erosion or siltation on- or off-site and would identify appropriate mitigation measures, if necessary, to avoid any significant impacts. The results of the hydrology analysis will be included the EIR.

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

Potentially Significant Impact. While the Project would not alter the course of a stream or river, construction activities could potentially alter drainage patterns and the rate and amount of surface runoff from the Project Site. Construction could redirect runoff in a manner that could cause flooding or sheet flows adjacent to the Project Site. As discussed above, a hydrology analysis is being prepared evaluate the change in drainage patterns that would occur with Project implementation. The results of the hydrology analysis will be included in the EIR.

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

Potentially Significant Impact. As discussed above under Responses to Checklist Questions X.c.(i-ii), the Project has the potential to alter the existing drainage patterns on the Project Site. A

hydrology analysis is being prepared to evaluate the change in drainage patterns that would occur with Project implementation. The analysis will include an evaluation of potential impacts to the stormwater drainage systems serving the Project Site. The results of the hydrology analysis will be included the EIR.

iv. Impede or redirect flood flows?

Potentially Significant Impact. The Project Site is not located within a flood zone, including a 100-year flood zone designated by the Federal Emergency Management Agency (FEMA).[29,30] Nonetheless, while the Project Site is not in a designated flood zone and would not alter the course of a stream or river, construction activities could potentially alter drainage patterns and the rate and amount of surface runoff from the Project Site. Construction or Project operations could redirect runoff in a manner that could cause flooding or sheet flows adjacent to the Project Site. As discussed above, a hydrology analysis is being prepared evaluate the change in drainage patterns that would occur with Project implementation. The results of the hydrology analysis will be included in the EIR.

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

Less Than Significant Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes.

As stated above, the Project Site is not located within a flood zone, including the 100-year flood zone designated by the FEMA.[31,32] The Project Site is also not located within a City-designated inundation hazard area.[33] Additionally, there are no levees or dams in the Project vicinity and flooding due to the failure of a levee or dam is unlikely. Furthermore, the Project Site is not located within a City-designated tsunami hazard area.[34] The Project Site is located approximately 12 miles inland (northeast) from the Pacific Ocean and separated from the ocean by the Santa Monica Mountains. Moreover, since the Project Site is located on a promontory and there are no bodies of water are located in close proximity, the Project Site would not be subject to significant seiche inundation hazards.

Based on the above, because the Project Site is not within a flood hazard, tsunami or seiche zone, there would be minimal, if any, risk or release of pollutants due to project inundation. Thus, a less than significant impact would occur in this regard. As such, further analysis of this topic in an EIR is not recommended and no mitigation measures are required.

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29 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 555 E. Universal Hollywood Drive, http://zimas.lacity.org/, accessed January 22, 2020.

30 Federal Emergency Management Agency, Flood Insurance Rate Map, Map Number 06037C1340F, Effective Date: September 25, 2008.

31 City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report for 555 E. Universal Hollywood Drive, http://zimas.lacity.org/, accessed January 22, 2020.

32 Federal Emergency Management Agency, Flood Insurance Rate Map, Map Number 06037C1340F, Effective Date: September 25, 2008.

33 City of Los Angeles General Plan, Safety Element Exhibit G, Inundation & Tsunami Hazard Areas, March 1994.

34 City of Los Angeles General Plan, Safety Element Exhibit G, Inundation & Tsunami Hazard Areas, March 1994.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Potentially Significant Impact. As discussed under Response to Checklist Question X.a., the Project's compliance to applicable water quality regulatory requirements would largely be expected to avoid significant impacts relating to water quality standards. Also, as discussed under Response to Checklist Question X.b., the Project would have a negligible effect on groundwater recharge at the Project Site, and impacts related to groundwater recharge/supply would be less than significant. Nonetheless, further analysis of water quality impacts will be provided in the EIR to evaluate potential impacts and identify appropriate design features and regulatory compliance mechanisms. The analysis will include an assessment of the Project's compliance with applicable water quality control plan(s) or sustainable groundwater management plan(s).

XI. LAND USE AND PLANNING

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

a. Physically divide an established community?

Less Than Significant Impact. The Project Site is located in an urbanized area characterized by a variety of commercial, office, and entertainment and production-related uses. The closest residential community is located south of the Project Site on the south side of the Hollywood Freeway. The Project consists of infill development and would expand the existing hotel uses on the Project Site, which primarily serve entertainment and production-related uses in the Project vicinity, including Universal Studios and CityWalk. The Hotel Expansion Building would be a total of 20 stories and would not exceed the height of the existing three high-rise buildings in the Project vicinity including the 24-story Existing Hotel Building, the 20-story Sheraton Universal Hotel, and the 36-story 10 Universal City Plaza Building. As such, the Project would be compatible with and complement existing and proposed uses in the surrounding area and would not be of a density, scale, or height to constitute a physical barrier separating an established community. Therefore, the Project would promote the existing commercial character of the surrounding area and would not physically divide an established community and a less than significant impact would result. No further analysis of this topic in an EIR or mitigation measures are required.

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

Potentially Significant Impact. The Project Site is located within the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan Area, one of 35 community plan areas in the City of Los Angeles. The City's 35 community plans collectively comprise the Land Use Element of the General Plan; they are the official guide to the future development of the City of Los Angeles.

Per the City's Zimas website, the Project Site has a land use designation of Regional Center Commercial. [35] The Regional Center Commercial designation corresponds to the Regional Center designation of the Los Angeles General Plan Framework (Framework Element). In general, the objectives of the Regional Center designation are to reinforce existing development and encourage the development of new regional centers that accommodate a broad range of uses that provide job opportunities, are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles. Regional Centers are defined as a focal point of regional commerce, identity and activity and containing a diversity of uses such as corporate and professional offices, residential, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities and supporting services. Generally, he Regional Centers will have a FAR that ranges from 1.5:1 to 6.0:1. Regional Centers are also characterized by buildings of 6 to 20 stories (or higher). Desired uses within a Regional Center include corporate and professional offices, retail commercial (including malls), offices, personal services, eating and drinking establishments, telecommunications centers, entertainment, major cultural facilities, hotels, and similar uses. Table 3-6 of the Framework Element indicates that the Regional Center designation would have a corresponding zoning designation of Limited Commercial (CR, C1.5) or Commercial ([Q]C2, C4). In addition, the General Plan Land Use Map for the Community Plan indicates that the Regional Center Commercial land use designation is intended for a range of commercial, multi-family residential, and mixed-use land uses. The Regional Center Commercial land use designation has corresponding zoning designations of Commercial (CR, C1.5, C2, and C4) and Multi-Family Residential (RAS3, RAS4, R3, R4, and R5).

It is anticipated that approvals required for implementation of Project would include, but may not be limited to, the following:

- Pursuant to LAMC Section 12.32-Q, a Vesting Zone Change for the portions of the Property from PB and RE15 to allow a uniform C2 zone for the entire Property;
- Pursuant to LAMC Section 12.32-F, a Height District Change for the Property from Height District No. 1 to Height District No. 2;
- Pursuant to LAMC Section 12.24-U.14, a Conditional Use for a "Major" development project that creates or results in 250 or more hotel guest rooms in the C2 zone;

[35] Zimas website available at http://zimas.lacity.org/, accessed August 7, 2020. The Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan Area Land Use Map (as of February 5, 2013) recognizes two land uses for the Project Site: 1) Regional Center (pre-FW or pre-Framework Element) and within Height District No. 2 (per footnote 5); and 2) Regional Commercial. According to the City's Zimas website, the Project Site is designated for Regional Center Commercial use, which is used by the City to determine the Project Site's current land use designation and as such, is utilized herein.

- Pursuant to LAMC Section 12.24-W.1, a Conditional Use Permit for the sale or dispensing of alcoholic beverages for onsite consumption at the Top Level restaurant and pool area on Level 17, restaurant on Level 2, and Junior Ballroom;
- Pursuant to LAMC Section 12.24-W.18, a Conditional Use Permit to allow for dancing and live entertainment in conjunction with the existing lobby/lounge area of the atrium within the Ancillary Hotel Building, the proposed Junior Ballroom, and proposed restaurants on Level 2 and Level 17;
- Pursuant to LAMC Section 16.05, Site Plan Review for a development that results in an increase of 50 guestrooms; and
- Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, haul route, Department of Public Works approval to remove non-protected trees from the Property, and sign permits.

The Zoning Administrator and Zoning Engineer Joint Memorandum dated February 27, 2014, states that a Conditional Use Permit is not required to establish a hotel, motel, or apartment in the C2 zones in areas designated on an adopted Community Plan as Regional Commercial even if the hotel, motel, or apartment is within 500 feet of an A or R Zone.

In addition, the Applicant will submit requests related to the Project, which will include approvals and permits from City departments, including the Department of Building and Safety and other municipal agencies for Project construction activities, including, but not limited to demolition, haul route, excavation, shoring, grading, foundation, and building and interior improvements, and Department of Public Works approval to remove non-protected trees from the Property.

Given the scale of the Project and the land use approvals and entitlements involved, there could be inconsistencies with applicable land use plans that result in significant impacts on the physical environment. Accordingly, the Project's conformity with applicable zoning and land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating environmental effects will be analyzed in the EIR.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. According to the Conservation Element of the City's General Plan, sites that contain potentially significant sand and gravel deposits which are to be conserved follow the Los Angeles River flood plain, coastal plain, and other water bodies and courses and lie along the floodplain between the San Fernando Valley and downtown Los Angeles.

The Project Site is not classified by the City as containing significant mineral deposits.[36] Furthermore, the Project Site is not designated as an existing mineral resource extraction area by the California Geological Survey.[37] Additionally, the Project Site is designated for Regional Center Commercial uses per the City's Zimas website and is not designated or zoned for mineral extraction uses. Therefore, the chances of uncovering mineral resources during construction and grading would be minimal. Project implementation would not result in the loss of availability of a known mineral resource of value to the region and residents of the State, nor of a locally important mineral resource recovery site. No impacts would occur and no mitigation measures would be required. No further analysis of this topic in an EIR is required.

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. As discussed above, the Project Site does not contain mineral deposits and is not designated as a mineral resource extraction area by the California Geological Survey. The Project Site is fully developed with urban uses, and is not zoned for mineral extraction uses. Therefore, Project implementation would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No impacts would occur and no mitigation measures would be required. No further analysis of this topic in an EIR is required.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐

[36] City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, Figure GS-1 – Areas Containing Significant Mineral Deposits in the City of Los Angeles.

[37] California Geological Survey, Aggregate Sustainability in California, California, 2018; https://www.conservation.ca.gov/cgs/Documents/Publications/Map-Sheets/MS_052_California_Aggregates_Map_201807.pdf Accessed July 2, 2020.

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

a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact. Construction of the Project would require the use of heavy construction equipment (e.g., bulldozers, backhoes, cranes, loaders, etc.) that would generate noise on an intermittent short-term basis. Additionally, operation of the Project may increase existing noise levels as a result of Project-related traffic, the operation of heating, ventilation, and air conditioning (HVAC) systems, outdoor use areas, increased vehicle usage in parking areas, and loading and unloading of trucks. As such, nearby noise sensitive uses could potentially be affected. Therefore, the Project's potential to exceed noise standards will be analyzed further in the EIR.

b. Generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Construction of the Project may generate groundborne vibration and noise due to site grading, clearing activities, and haul truck travel. In addition, Project construction may require pile-driving. As such, the Project would have the potential to generate or expose people to excessive groundborne vibration and noise levels during short-term construction activities. Therefore, this topic will be analyzed further in the EIR.

Post-construction on-site activities would be limited to hotel and hotel-related uses that would not generate excessive groundborne noise or vibration. As such, Project operation would not have the potential to expose people to excessive groundborne vibration or noise and impacts would be less than significant. Therefore, no further analysis of operational groundborne vibration or groundborne noise in an EIR or mitigation measures are required.

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

No Impact. As discussed in Response to Checklist Question IX.e above, the Project Site is not located within an airport land use plan, within two miles of a public use airport, or within the vicinity of a private airstrip. The nearest airport is the Burbank Bob Hope Airport, located approximately

3.75 miles north of the Project Site. Therefore, the Project would not expose people residing or working in the Project vicinity to excessive noise levels from an airport use and no mitigation measures would be required. No further analysis of this topic in an EIR is required.

XIV. POPULATION AND HOUSING

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

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

Less Than Significant Impact. Project construction would create new employment opportunities in the construction industry. However, the construction industry differs from other employment sectors in that many construction workers are highly specialized and move from job site to job site as dictated by the demand for their skills. Construction workers would remain at a job site for only the timeframe in which their specific skills are needed to complete a particular phase of the construction process, which would occur over an approximate two-year timeframe. Therefore, it is not likely that construction workers hired for the Project would relocate their households as a result of their employment. Impacts on population and housing due to Project construction activities would be less than significant.

The Project is anticipated to increase the number of employees at the Hilton Universal City Hotel by a total approximately 220 Full-Time Equivalent (FTE) employees, including 177 full-time employees and 86 seasonal/part-time employees. When combined with the Hotel's existing approximately 372 FTE employees (334 full-time and 76 part-time employees), the Hotel will employ a total of approximately 592 FTE employees upon Project completion. Based on SCAG's 2016-2040 RTP/SCS, the City's employment in 2020 is projected to be 1,831,458 employees[38] and is projected to increase to 1,915,868 persons by 2025.[39] The City's employment growth

[38] Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016.

[39] Employment projections are extrapolated from SCAG 2016-2040 RTP/SCS data for employment in the City of Los Angeles.

between 2020 and 2025 is expected to be approximately 84,410 employees, or an increase of approximately 4.6 percent. Accordingly, any employment growth from the Project's 220 new employment opportunities would be less than one percent (approximately 0.3 percent) of future projected employment growth for the City. While new employment opportunities would be created with the Project, it is anticipated that most of the expected employees would be drawn from the existing labor force in the region and would not need to relocate to the Project area. Thus, any impacts on employment growth would be less than significant.

However, since it is possible that future employees could permanently relocate to the area, assuming all new employees relocate, this population growth would be minimal in the context of growth forecasted for the City in the SCAG 2016-2040 RTP/SCS and would not place a substantial demand on housing. Based on SCAG's 2016-2040 RTP/SCS, the City's population in 2020 is projected to be 4,063,758 persons[40] and is projected to increase to 4,200,168 persons by 2025.[41] The City's population growth between 2020 and 2025 is expected to be approximately 136,410 persons, or an increase of approximately 3.4 percent. Accordingly, any indirect population growth resulting from the Project's 220 new employment opportunities would be less than one percent (approximately 0.2 percent) of future projected growth for the City.

Accordingly, any indirect population growth resulting from the Project's 220 new employment opportunities would be less than one percent of future projected growth for the City. Thus, any impacts on population growth would be less than significant.

In addition, the Project would not include the construction of new homes that could directly induce population growth or require the extension of public roadways or other infrastructure (e.g., water facilities, sewer facilities, electricity transmission lines, natural gas lines, etc.) into undeveloped areas that could indirectly induce population growth. All infrastructure improvements associated with the Project would occur within or in the immediate vicinity (for connections and upgrades) of the Project Site. As a result, the development of the Project would not indirectly induce substantial population growth into currently undeveloped areas and indirect impacts would be less than significant. No further analysis of this topic in an EIR is required.

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

No Impact. No dwelling units are currently located on the Project Site and implementation of the Project would not result in the displacement of a substantial number of people. Since housing or people would not be displaced, the construction of replacement housing elsewhere would not be necessary. No impact would occur and no mitigation measures would be required. No further analysis of this topic in an EIR is required.

[40] Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016.

[41] Population projections are extrapolated from SCAG 2016-2040 RTP/SCS data for population in the City of Los Angeles.

XV. PUBLIC SERVICES

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

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

a. Fire protection?

Potentially Significant Impact. The LAFD provides fire protection and emergency medical services in the City. Three LAFD fire stations are located in the vicinity of the Project Site, including Fire Station No. 86 at 4305 Vineland Avenue (approximately 1.0 mile northwest of the Project Site); Fire Station No. 76 at 2230 South Pasadena Avenue (approximately 2.0 miles northeast of the Project Site); and Fire Station No. 60 at 5320 Tujunga Boulevard (approximately 2.25 miles northeast of the Project Site). The majority of Universal City, including the area located directly across Universal Hollywood Drive from the Project Site, is located within unincorporated Los Angeles County and served by the Los Angeles County Fire Department (LACFD). LACFD Fire Station 51 (Universal City) is addressed at 3900 Lankershim Boulevard, but is actually located within Universal City approximately 0.10-mile northeast of the Project Site, which makes LACFD Fire Station 51 the closest fire station to the Project Site. Although the LAFD would continue to be the first responder to a call for service at the Project Site, the LAFD and LACFD operate under an aid agreement to respond with additional units when necessary.

As discussed in Checklist Question IX.g above, the Project Site is located within a VHFHSZ. VHFHSZs are primarily located the hilly and mountainous regions of the City where wildland fires originating on brush-covered undeveloped hillsides can be affected by urban development, and vice versa. Development and access within VHFHSZs are regulated by LAMC Section 57.4908. While the provisions of LAMC Section 57.4908 primarily address undeveloped parcels, there are also provisions that prohibit open flames and smoking on developed parcels within a VHFHSZ, as enforced by posted signage, and that require fire clearance areas be maintained around structures.

The Project would increase the developed floor area and the number of hotel guests, visitors, and employees on the Project Site, which could increase the demand on LAFD services and facilities and result in the need for new or physically altered facilities to maintain service. Therefore, the EIR will provide further evaluation of the Project's potential impacts on fire protection services.

b. Police protection?

Potentially Significant Impact. The Los Angeles Police Department (LAPD) provides police protection services in the City of Los Angeles. The LAPD is divided into four Police Station Bureaus, each of which serve their proximate communities: Central Bureau, South Bureau, Valley Bureau, and West Bureau. The Project Site is located in LAPD's Valley Bureau, which serves the Devonshire, Foothill, Mission, North Hollywood, Topanga, Van Nuys, and West Valley communities. The Valley Bureau also operates the traffic-focused Valley Traffic Division.

The Project Site is served by the North Hollywood Police Station located at 11640 Burbank Boulevard (approximately 2.7 miles northwest of the Project Site). The majority of Universal City–including the area located directly across Universal Hollywood Drive from the Project Site–is located within unincorporated Los Angeles County and served by the County of Los Angeles Sheriff's Department (LASD), which maintains the Universal CityWalk Substation approximately 0.2 mile east of the Project Site. Nevertheless, the LAPD would continue to be the first responder to calls for service to the Project Site. The Project would increase the developed floor area and the number of hotel guests, visitors, and employees on the Project Site, which could increase demand on LAPD services and facilities and result in the need for new or physically altered facilities to maintain service. Therefore, the EIR will provide further evaluation of the Project's potential impacts on police protection services.

c. Schools?

Less Than Significant Impact. The Project Site is located within the jurisdiction of the Los Angeles Unified School District (LAUSD), and is specifically located within the southeastern boundary of the LAUSD Northeast Local District. Hotel Drive in the immediate vicinity roughly serves as the local district boundary with the LAUSD West Local District. The Project Site is within LAUSD Board District 4.

There are no existing or proposed residential uses on the Project Site that would result in direct student enrollment. Therefore, LAUSD does not identify the LAUSD schools that would serve the Project Site. Nonetheless, the LAUSD recognizes that new employment opportunities could indirectly increase enrollment if workers were to relocate with their families to communities within the LAUSD boundaries. To account for any indirect growth resulting from non-residential development, LAUSD published the *2018 Developer Fee Justification Study*. The study included a student per employee ratio of 0.2249 within the LAUSD.[42] The Project would result in 220 new FTE employees, which would result in approximately 50 new students within the LAUSD. These students would be dispersed throughout LAUSD elementary, middle and high schools.

Because employees would generally be expected to come from the local Project vicinity, it cannot be precisely determined where students of the employees would attend school. Regardless, due to the relatively low number of students that would be indirectly generated by Project implementation, the Project is not anticipated to result in an exceedance of capacity at LAUSD

[42] Los Angeles Unified School District, 2018 Developer Fee Justification Study, March 2018. page. 20.

schools to the extent that the provision of new or physically altered school facilities would be required, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

Nonetheless, to the extent that on-site development increases demand at LAUSD schools, state laws, including Government Code Section 65995 and Education Code Section 17620, requires the payment of fees at a specified rate for the funding of improvements and expansion to school facilities. Such fees are paid at the issuance of building permits. In accordance with Senate Bill 50 (SB 50), enacted in 1998, the payment of this fee is deemed to provide full and complete mitigation for impacts to school facilities. Based on these considerations, impacts on schools would be less than significant. No further analysis of this topic in an EIR or further mitigation measures are required.

d. Parks?

Less Than Significant Impact. The City of Los Angeles Department of Recreation and Parks (LADRP) is responsible for the provision, maintenance, and operation of public recreational and park facilities and services in the City of Los Angeles. Currently, the LADRP maintains over 16,000 acres of parkland within approximately 444 park sites LADRP operates hundreds of athletic fields, 422 playgrounds, 321 tennis courts, 184 recreation centers, 72 fitness areas, 62 swimming pools and aquatic centers, 30 senior centers, 26 skate parks, 13 golf courses, 12 museums, 9 dog parks, 187 summer youth camps, and 92 miles of hiking trails.[43]

In addition to Griffith Park, which is a regional park easily accessible from the Project Site, parks located within two miles of the Project Site that could serve Project guests, visitors, and employees include:

1. Campo de Cahuenga Park – 3919 Lankershim Boulevard
2. North Weddington Recreation Center – 10844 Acama Drive
3. Weddington Park South – 10800 W Valleyheart Drive
4. Woodbridge Park – 11240 Moorpark Street
5. North Hollywood Park and Recreation Center – 11430 Chandler Boulevard
6. Witnall Highway Park South – 600 N Whitnall Highway (operated by Burbank, CA)
7. Johnny Carson Park – 400 Bob Hope Drive (operated by Burbank, CA)
8. Buena Vista Park – 2500 W Riverside Drive (operated by Burbank, CA)
9. Lake Hollywood Park – 3160 Canyon Drive
10. Runyon Canyon Park – 2000 N. Fuller Avenue
11. Wattles Garden Park – 1850 North Curson Avenue
12. Trebek Open Space – Nichols Canyon Road
13. Briar Summit Open Space Preserve – terminus of Briar Summit Drive

[43] Los Angeles Department of Recreation and Parks website, “Who We Are”. https://www.laparks.org/department/who-we-are. Accessed January 22, 2020.

14. Laurel Canyon Park – 8260 Mulholland Drive
15. Fryman Canyon Park – 8401 Mulholland Drive
16. Wilacre Park – 12601 Mulholland Drive

In addition, several designated scenic overlooks are located adjacent to Mulholland Drive within a two-mile radius of the Project Site, including the Hollywood Bowl Overlook, Universal City Overlook, Nancy Hoover Pohl Overlook, Dead Man Overlook, and Autry Overlook.

Residential uses, which are not proposed by the Project, typically generate the greatest demand for parks and recreational services. While the Project would generate additional hotel guests, visitors, and employees that might utilize nearby parks, any increase in the use of public park and recreation facilities would not be substantial because hotel guests would likely prefer the use of the private amenities provided by the Hilton Universal City Hotel. As described above, the Project would provide a variety of recreational amenities for hotel guests, including a spa, two pool areas, fitness room, and a landscaped multi-use open space area. These facilities would reduce the Project's demand for use of existing public recreational and park facilities by hotel guests. Further, as under existing conditions, many guests staying at the hotel specifically to visit Universal Studios Hollywood and Universal CityWalk and would not visit local parks, which would further reduce the demand for parks and recreational facilities resulting from the Project.

The Project is anticipated to increase the number of employees at the Project Site by a total approximately 220 FTE employees. While the Project would result in an increase in employees at the Hilton Universal City Hotel, most people would tend to utilize parks and recreational facilities near their place of residence and not their place of work. Additionally, employees typically do not have long breaks during a work shift to visit nearby parks and recreational facilities. As such, the Project's employees would not create a substantial demand for parks and recreational services.

As stated previously in Response to Checklist Question XIV(a), the Project is not anticipated induce substantial population growth in the Project area. Thus, the Project would not likely result in any measurable demand for parks and recreational services, and therefore, would not create the need for new or altered parks and recreational facilities. Thus, the Project would have a less than significant impact on park and recreational facilities. No further analysis of this topic in an EIR or mitigation measures are required.

e. Other public facilities?

Less Than Significant Impact. The Los Angeles Public Library (LAPL) provides library services to the City. As the Project does not include residential uses, which typically generates demand for library services, the Project is not anticipated to cause an increase in demand for library services and facilities that would exceed the service capacity of LAPL libraries serving the Project Site. Also, because Project employees would generally be expected to come from the local vicinity, they are likely to continue to utilize existing LAPL library facilities near their place of residence. Any Hotel employees that would relocate their place of residence to the Project vicinity would be expected to move into existing housing which is already accounted for in LAPL library facility demand projections. As such, impacts with respect to library services would be less than significant. No mitigation measures would be required and no further analysis of this topic in an EIR is required.

During construction and operation of the Project, other governmental services, including roads, would continue to be utilized. Project guests, visitors, and employees would use the existing road

network. The Project would not require the construction of new roadways, or expansion of the existing road network to serve the Project Site. The Project would result in an increase in the number of vehicle trips attributable to the Project Site. However, the additional vehicle trips on local roadways would not include the long-term use of significant numbers of regular heavy-duty truck/vehicle trips that would necessitate the upkeep of such facilities beyond typical City standards. Therefore, the Project would result in less than significant impacts on other governmental services. No further analysis of other governmental services in an EIR or mitigation measures are required.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

a. Would the project Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

Less Than Significant Impact. As discussed in the Response to Checklist Question XV(d) above, the Project would introduce new guests, visitors, and employees to the Project Site, which could increase the use of existing parks and recreational facilities. However, the Project would provide a variety of on-site recreational amenities to offset the increase in the demand on existing facilities. Thus, the Project is not anticipated to increase the use of nearby parks and recreational facilities such that substantial physical deterioration of these facilities would occur or be accelerated. Therefore, impacts would be less than significant. No further analysis of this topic in an EIR or mitigation measures are required.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact. The Project would provide a variety of recreational amenities for use by hotel guests and visitors, including a 10,000-square-foot spa, an approximately 2,600 square-foot fitness center, and two pool decks, and a landscaped multi-use open space area between the Hotel Expansion Building, Existing Hotel Building, and Ancillary Hotel Building.

These Project features have been incorporated into the overall Project design. Therefore, construction of these recreational facilities, which are part of the Project, and the resulting physical effects on the environment are assessed within this Initial Study. No further analysis of this topic in an EIR or mitigation measures are required.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☒	☐	☐	☐
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☒	☐	☐	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

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

Potentially Significant Impact. The Project Site is located in an area well served by public transportation. Several transit providers operate transit service within the immediate vicinity, most notably the Metro Red Line Universal City/Studio City Station, located at the intersection of Lankershim Boulevard and Universal Hollywood Drive, 0.25 mile west of the Project Site. Metro also operates two bus lines along Lankershim Boulevard in the Project vicinity. Specifically, bus stops for Metro Local 155 and Local 224 are maintained at the intersection of Lankershim Boulevard and Universal Hollywood Drive. The Metro Local 155 provides local service between Sherman Oaks and Burbank, while the Local 224 provides local service between Sylmar and the Universal/Studio City station. The Metro Universal/Studio City Station acts as a transfer hub for both local bus lines. Universal Studios also operates a complimentary shuttle to Universal Studios Hollywood and Universal CityWalk on a 15 to 20-minute cycle to and from both the Sheraton Universal Hotel and Hilton Universal City Hotel as a courtesy for park attendees staying at both hotels. This shuttle reduces the traffic on Universal Hollywood Drive as well as W.C. Fields Drive. The Project does not propose modifications to vehicular or pedestrian access to/from the Project Site. Further, the Project would provide 73 bicycle parking spaces to meet applicable LAMC bicycle parking requirements.

Nonetheless, a Transportation Assessment (TA) in accordance with LADOT's Transportation Assessment Guidelines (TAG) adopted in July 2019 will be prepared for the Project. In accordance with the TAG and consistent with the City CEQA Transportation Thresholds (adopted July 30, 2019), the TA's CEQA-required analyses will include an assessment of whether the Project would result in potential conflicts with transportation-related plans, ordinances, or policies. The results of the TA will be included in the EIR.

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Potentially Significant Impact. CEQA Guidelines Section 15064.3 describes specific considerations for evaluating a project's transportation impacts. Generally, vehicle miles traveled (VMT) is identified as the most appropriate measure of transportation impacts. For the purposes of this CEQA section, VMT refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided in subdivision (b)(2) (regarding roadway capacity for some transportation projects), a project's effect on automobile delay shall not constitute a significant environmental impact.

Per section 15064.3.b.1, for land use projects, VMT exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease VMT in the Project area compared to existing conditions should be presumed to have a less than significant transportation impact.

A TA is being prepared for the Project in consultation with LADOT. The TA will include a VMT analysis that will be prepared in accordance with LADOT's TAG, which define the methodology of analyzing a project's transportation impacts in accordance with SB 743. The analysis will be consistent with CEQA Guidelines section 15064.3, subdivision (b) and will be summarized in and appended to the EIR.

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

Less Than Significant Impact. The roadways adjacent to the Project Site are part of an established urban roadway network and contain no sharp curves or dangerous intersections. While the Project would increase the number of vehicle trips to and from the Project Site, it would not construct new access driveways along the Project Site perimeter, significantly alter internal circulation patterns with the exception of the fire lane expansion/connection into the parking structure, or create new pedestrian paths or stairways with the potential for substantial pedestrian/vehicle conflicts. If the potential future pedestrian path adjacent to the hotel driveway were to be constructed, it would provide a safer pedestrian route to Universal Studio Hollywood. Vehicles and pedestrians would continue to access the Project Site via the Project Site's existing driveway on Universal Hollywood Drive, which would not require modification to accommodate the proposed expansion. Therefore, a less than significant impact would occur and no mitigation measures would be required. No further analysis of this topic in an EIR is required.

d. Result in inadequate emergency access?

Less Than Significant Impact. The Project Site is located in an established urban area that is well-served by a roadway network. While it is expected that the majority of Project construction activities would be confined on-site, short-term construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. In these instances, the Project would implement traffic control measures (e.g., construction flagmen, signage, etc.) to maintain flow and access. Furthermore, in accordance with City requirements the Project would develop a Construction Management Plan, which would include designation of a haul route, to ensure that adequate emergency access is maintained during construction. Access to the Project Site would continue to be accommodated via the existing driveway entrance on Universal Hollywood Drive. Emergency vehicle access would also continue to be available via the existing service road along the eastern side of the existing buildings. Therefore, construction would not result in inadequate emergency access.

Project operation would generate additional traffic in the Project vicinity, but would not require modifications to vehicle or pedestrian access (i.e., new curb cuts or Project driveways) to the Project Site. Specifically, access to the Project Site would continue to be accommodated via the existing driveway entrance on Universal Hollywood Drive. Emergency vehicle access would also continue to be available via the existing service road. As a result, emergency access to the Project Site and surrounding area would continue to be provided as under existing conditions. LADOT and the City's Bureau of Engineering would review all design plans to ensure that there are no Project traffic-related design features which would impede access along Universal Hollywood Drive or with the Project vicinity. Upon review and approval of Project Site access and circulation plans by the City, the Project would not impair implementation or physically interfere with emergency access. Since the Project Site is not located adjacent to, and would not cause an impediment along a City-designated emergency evacuation route, and the proposed hotel and restaurant uses would not impair implementation of the City's emergency response plan, the Project would have a less than significant impact with respect to emergency access. As such, no further evaluation of this topic in an EIR or mitigation measures are required.

XVIII. TRIBAL CULTURAL RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☒	☐	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐

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

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Potentially Significant Impact (a-b). AB 52 establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to tribal cultural resources, as defined in Public Resources Code Section 21074, as part of CEQA. AB 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration on or after July 1, 2015, which includes the Project. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Should any information be gained during

the consultation process, it would be used to analyze impacts to tribal cultural resources in the EIR. The existence of tribal cultural resources on the Project Site is currently unknown. Therefore, further analysis of the topic will be provided in the EIR to determine the potential for, and significance of, the Project's impacts on tribal cultural resources.

XIX. UTILITIES AND SERVICE SYSTEMS

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

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

Water

Potentially Significant Impact. The water system consists of two components: the source of the water supply and the conveyance system (i.e., distribution lines and mains) that provides the Project Site with water. As previously discussed, water is currently supplied to the Project Site by

the LADWP. The Project would develop approximately 300,000 square feet of additional hotel-related uses, which would increase the water demand for the Project Site. The potential of the Project to result in the need for new or expanded water facilities will be analyzed further in the EIR. A Utility and Infrastructure Report, which includes analyses of the water system and fire flows is being prepared to evaluate water availability with Project implementation. The results of this analysis will be included in the EIR.

Wastewater

Less Than Significant Impact.

The City of Los Angeles Department of Public Works provides wastewater collection and treatment services for the Project Site. Any wastewater generated at the Project Site is treated at the Hyperion Water Reclamation Plant (HWRP). The HWRP is a part of the Hyperion Treatment System, which also includes the Tillman Water Reclamation Plant and the Los Angeles-Glendale Water Reclamation Plant. The existing design capacity of the HWRP is approximately 450 million gallons per day (MGD). Currently, approximately 275 MGD is treated at the HWRP resulting in residual treatment capacity of approximately 175 MGD.[44] The discharge of effluent from the HWRP into Santa Monica Bay is regulated by the HWRP's National Pollutant Discharge Elimination System (NPDES) permit issued under the Clean Water Act and is required to meet the LARWQCB's requirements for a recreational beneficial use, which impose performance standards on water quality that are more stringent than the standards required under the Clean Water Act permit administered under the NPDES permit. Accordingly, HWRP effluent to Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed standards. The Los Angeles County Department of Health Services also monitors flows into the Santa Monica Bay. Further, the HWRP is required to comply with associated waste discharge requirements (WDRs) and any updates or new permits issued. WDRs set the levels of pollutants allowable in water discharged from a facility.

Construction

Less Than Significant Impact. Project construction activities would generate a small amount of wastewater associated with Project construction workers, with the number of workers fluctuating during the various phases of construction from approximately 8 to 200 daily workers. However, any such wastewater generation would be temporary. It is anticipated that portable toilets would be provided by a licensed private vendor that would dispose of the wastewater off-site. No service connections would be established during Project construction to handle wastewater generated by construction workers. The amount of wastewater generated by 200 workers would be far below the amount that would be generated by the Project during operation. As described below, Project operation would result in less than significant wastewater conveyance impacts. Therefore, it is reasonable to conclude that wastewater generation from Project construction activities would not cause a meaningful increase in wastewater flows requiring new or expanded collection and conveyance facilities.

With respect to Project construction impacts on wastewater treatment capacity, the amount of wastewater generated during Project construction would be minimal compared to Project

[44] City of Los Angeles Department of Public Works, LA Sanitation, Hyperion Water Reclamation Plant: Process–Treatment Process, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=1cxnptwvdl_5&_afrLoop=634490588239784#!. Accessed January 22, 2020.

operations. As discussed above, the HWRP has a remaining existing residual treatment capacity of approximately 175 MGD[45] and Project operations would result in less than significant impacts regarding wastewater treatment capacity. Accordingly, since the wastewater generated during Project construction would be far less than Project operation, Project construction would also result in less than significant impacts.

The Project would require the construction of a new on-site wastewater collection system, and a sewer lateral connection between this new system and the existing 15-inch sewer line in W.C. Fields Drive. Construction impacts associated with the installation of this infrastructure would primarily involve trenching in order to place the lines below the surface. This trenching, and the associated installation of the sewer infrastructure would occur within an already developed Project Site, and would be limited in extent and temporary in nature. Furthermore, prior to ground disturbance, Project contractors would coordinate with the Department of Public Works to identify the locations and depth of all lines and the City would be notified in advance of proposed ground disturbance activities to avoid sewer lines and disruption of sewer service. Lastly, any impacts associated with the construction of this infrastructure would be accounted for in the impact analysis for the Project in other sections of this Initial Study and/or EIR (e.g., Air Quality, Noise, Traffic, etc.).

Based on the above, Project construction activities would not require the construction or relocation of new or expanded wastewater collection or treatment facilities, the construction or relocation of which could cause significant environmental effects, the impact would be less than significant, and, therefore, no further analysis of this topic in an EIR or mitigation measures are required.

Operation

Less Than Significant Impact. The following analysis is from the Wastewater Technical Report prepared for the Project by KPFF in September 2020 and included as Appendix C of this Initial Study.

The City of Los Angeles Bureau of Sanitation (LASAN) maintains the City's network of sanitary sewer infrastructure surrounding the Project Site. The Project Site is served by a private 10-inch sanitary sewer line flowing southerly within an existing easement dedicated to the Hotel for sanitary sewer purposes across the neighboring property. The easement extends from the Project Site all the way to a 15-inch diameter vitrified clay pipe (VCP) City of Los Angeles public sewer main located in W.C. Fields Drive that flows northwest. Within the easement the private 10-inch sewer line first flows south into an existing manhole. From the manhole, a private 12-inch sewer continues to flow within the easement westerly where it eventually discharges into the public 15-inch City of Los Angeles sewer line located within W.C. Fields Drive. The 15-inch line connects into the segment of the public 21-inch VCP City sanitary sewer main that runs along Lankershim Boulevard.[46]

The LAMC includes regulations that allow the City to ensure available sewer capacity for new projects and collect fees for improvements to the infrastructure system. LAMC Section 64.15 requires that the City perform a Sewer Availability Request (SCAR) when any person seeks a

[45] City of Los Angeles Department of Public Works, LA Sanitation, Hyperion Water Reclamation Plant: Process–Treatment Process, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=1cxnptwvdl_5&_afrLoop=634490588239784#!. Accessed January 22, 2020.

[46] While the size of the sewer pipe in Lankershim Boulevard varies in diameter, at the point where it connects with the line in W. C. Fields Drive, the pipe in Lankershim Boulevard is a 21-inch diameter pipe.

sewer permit to connect a property to the City's sewer collection system, proposes additional discharge through their existing public sewer connection, or proposes a future sewer connection or future development that is anticipated to generate 10,000 gallons or more of sewage per day. In accordance with the City's requirements, the developer will request the completion of an additional SCAR as part of the permit application process. As discussed below, a SCAR has recently been completed to evaluate sewer availability at the time of this of this environmental analysis.

LAMC Section 64.11.2 requires the payment of fees for new connections to the sewer system to ensure the sufficiency of sewer infrastructure. In addition, the City establishes design criteria for sewer systems to ensure that new infrastructure provides sewer capacity and operating characteristics to meet City Standards (Bureau of Engineering Special Order No. S006-0691).

Wastewater Conveyance Capacity

According to the Wastewater Technical Report, based on City of Los Angeles provided gauging data, existing demands, and projected development demands both the private 10-inch and the private 12-inch sewers within the existing easement have adequate capacity for the Project.

. A SCAR was submitted to LASAN to confirm that the sewer lines serving the Project Site have the capacity required to accommodate the Project's wastewater flow. Also, a Wastewater Service Information (WWSI) letter was provided by LASAN to document the sewer availability to serve the Project. The SCAR and WWSI are included in the appendices to the Wastewater Technical Report. As indicated in the WWSI, as well as the SCAR and LASAN Will Serve Letter, included as part of the Wastewater Technical Report, the Project would generate an estimated 95,024 gallons per day (GPD) of wastewater tributary to the 15-inch diameter VCP in W.C. Fields Drive. This wastewater generation amount is conservative as it does not take into account any required conservation features or conservation commitments from the Applicant. According to the WWSI, as well as the SCAR and the LASAN Will Serve Letter included in the Wastewater Technical Report, the wastewater system serving the Project Site has the capacity to accommodate 100% of the projected wastewater flow generated by the proposed uses. Therefore, the Project would not require the relocation or construction of new wastewater conveyance facilities, the construction or relocation of which would cause significant environmental effects. Impacts would be less than significant and no further analysis of this topic in an EIR or mitigation measures are required.

Wastewater Treatment Capacity

As previously discussed, the HWRP currently receives an average dry weather flow of 275 MGD, for a residual treatment capacity of approximately 175 MGD, and is therefore operating at approximately 61 percent of its design capacity. Because the amount of wastewater entering HWRP can double on rainy days, the plant was designed to accommodate wet weather days with a peak wet weather flow of 800 MGD. The approximately 0.095 MGD of wastewater that would be generated by the Project would comprise less than 0.02% of the available capacity at the HWRP.[47] Therefore, the Project would not require the relocation or construction of new wastewater treatment facilities, the relocation or construction of which would cause significant

[47] Capacity determined by the following: 1) The Project would generate 95,024 gallons per day or 0.095 MGD; 2) 0.095 MGD ÷ 450 MGD peak capacity = 0.02%.

environmental effects, the impact would be less than significant. No further analysis of this topic in an EIR or mitigation measures are required.

Storm Water Drainage Facilities

Potentially Significant Impact. Under existing conditions, the Project Site is developed with hotel-related buildings and associated supporting infrastructure. Current drainage flows on the Project Site are unknown and will be determined in a site-specific hydrology study. As discussed above under Response to Checklist No. X.c., Project implementation would require grading, which could result in alterations to the drainage pattern at the Project Site. A stormwater drainage and hydrology analysis is being prepared for the Project, and results will be included in the EIR.

Electric Power, Natural Gas, and Telecommunications Facilities

Less Than Significant Impact. The Project Site is located in a developed, urbanized portion of Los Angeles that is served by existing electrical power, natural gas, and telecommunications services. With respect to Project operations, the Project would obtain energy from the LADWP, which has committed to diversify its portfolio of energy sources to achieved 35 percent renewables by 2020. In addition, natural gas would be supplied by SoCalGas. The Project Site would also connect to existing underground telecommunication lines (for internet, telephone, and other services). Construction impacts associated with the installation of electric power, natural gas, or telecommunications infrastructure would primarily involve minor trenching in order to place the lines below the surface and/or connections to such existing infrastructure. This trenching, if any, and the associated installation of such infrastructure would be limited in extent and temporary in nature, and would occur within the Project Site and/or within the adjacent right-of-way of Universal Hollywood Drive. Prior to ground disturbance, Project contractors would coordinate with LADWP, Department of Public Works, and telecommunication companies, as necessary, to identify the locations and depth of all electricity, natural gas, and telecommunication lines and they would be notified in advance of proposed ground disturbance activities to avoid other existing utility lines and disruption of utility service. Further, a Construction Traffic Management Plan for the Project would be prepared in order to minimize disruptions to traffic flow, which would consider any Project-related utility improvements, as necessary. Lastly, any impacts associated with the construction of such infrastructure would be accounted for in the impact analysis for the Project in other sections of this Initial Study and/or EIR (e.g., Air Quality, Noise, Traffic, etc.). New connections would be established for the Project; however, no substantial electrical, natural gas, or telecommunications infrastructure is present on or adjacent to the Project Site that would need to be relocated to accommodate the Project. Thus, impacts would be less than significant. No further analysis of this topic in an EIR or mitigation measures are required.

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Potentially Significant Impact. As previously discussed, LADWP supplies water to the Project Site. The Project would develop and additional 300,000 square feet of floor area on the Project Site, which would increase water demand beyond existing conditions. Sections 10910-10915 of the State Water Code (Senate Bill [SB] 610) requires the preparation of a water supply assessment (WSA) demonstrating sufficient water supplies for a project that, among other criteria, would have a water demand equivalent of more than 500 dwelling units. Therefore, given the Project's increased water demand, the EIR will analyze the adequacy of available water supplies and the capacity of the infrastructure serving the Project. The Project's estimated water demand

would be based on demand factors for the individual land use components, taking into account any water conservation measures proposed by the Project. The EIR analysis will also discuss the Project consistency with water supply projections contained in the City's UWMP. The results of the WSA will be included in the EIR.

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

Less Than Significant Impact. See the Wastewater Treatment Capacity analysis in Response No. XIX.a above. As indicated therein, adequate wastewater treatment capacity is available to serve the Project. Therefore, the impact would be less than significant, and no further analysis of this topic in an EIR or migration measures are required.

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

Less Than Significant Impact. Solid waste management in the City of Los Angeles involves both public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. LASAN is responsible for developing strategies to manage solid waste generation and disposal in the City of Los Angeles. LASAN collects solid waste generated primarily by single-family dwellings, small multi-family dwellings, and public facilities. Private hauling companies collect solid waste generated primarily from large multi-family residential, commercial, and industrial properties. The City of Los Angeles does not own or operate any landfill facilities, and the majority of its solid waste is disposed of at County landfills.

Construction

Less Than Significant Impact. The Project would remove various hardscaped and landscaped areas within the Project Site, which would generate demolition debris and soil for export. In addition, the Project would construct the new Hotel Expansion Building, Junior Ballroom/Meeting Room Addition, and associated infrastructure, which would also generate construction debris. It should be noted that soil export is not typically included in the calculation of construction waste to be landfilled since soil is not disposed of as waste but, rather, is typically used for ground cover. Thus, soil export is not included in the Project's construction and demolition (C&D) waste totals. As shown in **Table 4-2**, *Project Solid Waste Generation During Construction*, Project construction would generate an estimated 2,107 tons of C&D waste. This estimate do not take into account the amount of C&D waste that would be diverted via source reduction and recycling programs within the City. Consistent with requirements of AB 939, a minimum of 50 percent of the C&D waste would be recycled, which would reduce the total C&D waste to approximately 1,054 tons. This total is conservative because the Project would strive to exceed the minimum AB 939 requirement and recycle more than 50 percent, if feasible.

TABLE 4-2
PROJECT SOLID WASTE GENERATION DURING CONSTRUCTION

	Quantity	Generation Factor	Waste Generation (tons)
Demolition of Buildings	8,700 sf	158 lbs per sf [a]	640
Demolition of Hardscape	55,000 sf (or 680 cy)[b]	2400 lbs per cy[c]	816
Overall Building Construction	300,000 sf[d]	4.34 lbs/sf [e]	651
Total			**2,107**

Abbreviations: cy = cubic yards; sf = square feet

[a] United States Environmental Protection Agency, "Estimating 2003 Building-Related Construction and Demolition Materials Amounts," Table 2-4, 2003.

[b] Assumes hardscape is approximately 4 inches deep. 55,000 sf of asphalt area at 4 inches of depth = 680 cubic yards (CY)

[c] CalRecycle, Solid Waste Cleanup Program Weights and Volumes for Project Estimates, https://www.calrecycle.ca.gov/swfacilities/cdi/tools/calculations. Accessed January 22, 2020.

[d] For purposes of this solid waste analysis, it is conservatively assumed that overall building construction would include up to 300,000 square feet, which would account renovations in the Existing Hotel Expansion Building as well as landscape and surface parking area improvements occurring with the greater Project Site.

[e] United States Environmental Protection Agency, "Estimating 2003 Building-Related Construction and Demolition Materials Amounts," Table A-2, 2003.

SOURCE: ESA, 2020.

The C&D waste that would be generated by the Project would require disposal at Azusa Land Reclamation, the County's only operating inert landfill, or at any of a number of Inert Debris Engineered Fill Operations (IDEFOs) in the County such as the Arcadia Reclamation Facility. As of 2018, the Azusa Land Reclamation Facility has a remaining disposal capacity of 57.72 million tons (or 46.17 million cubic yards), a permitted intake of 6,500 tons per day (tpd), and average existing intake of 1,258 tpd, and a remaining life span of an estimate 28 years.[48] The Project's total solid waste disposal need during construction of 1,054 tons, after 50 percent diversion, would represent a tiny fraction (approximately 0.001% percent) of the estimated remaining capacity of the Azusa Land Reclamation Facility. Furthermore, there are other sites within the County and out-of-County that could potentially be utilized for disposing Project C&D waste. Therefore, Project construction would have a less than significant impact on the capacity of the inert landfill and IDEFOs serving the City and impacts would be less than significant. No further evaluation of this topic in an EIR or mitigation measures are required.

Operation

The estimated Class III solid waste generation for the Project during operation is shown in **Table 4-3**, *Project Solid Waste Generation During Operation*. As indicated therein, Project operation would generate an estimated 141 tons per year (TPY) of Class III solid waste after the 75 percent diversion goal set by AB 939 and AB 341 starting in year 2020. This would represent a negligible proportion (approximately 0.0001 percent) of the County's 2018 annual Class III solid waste

[48] County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan, 2018 Annual Report, December 2019. Page 57.

generation total of 10,482,809 tons, and an incremental fraction of the total remaining 163.4 million ton capacity of the County's Class III landfills.[49]

TABLE 4-3
PROJECT SOLID WASTE GENERATION DURING OPERATION

Land Use	Quantity	Daily Generation Factor[a]	Solid Waste Generation	
			lbs/day	Tons/year
Hotel	395 rooms	4 lbs/room	1,580	289
Restaurant/Bar	1,176 seats	1 lb/seat	1,176	215
Spa	10,000	3.12 lbs/100 sf	312	57
Total (Pre-Diversion)			**3,068**	**561**
Total with 75% Diversion[b]			**767**	**141**

Acronyms: lbs = pounds

[a] Generation factors from the CalRecycle website, Estimated Solid Waste Generation Rates, https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates. Accessed January 22, 2020.

[b] Based on an anticipated diversion rate of 75 percent starting in 2020 required by AB 939 and AB 341.

SOURCE: ESA, 2020.

The Sunshine Canyon Landfill is the primary recipient of Class III solid waste from the City. This landfill has a maximum daily capacity of 12,100 tpd, an average disposal rate of 7,012 tpd in 2018, and a residual daily capacity of 5,088 tpd.[50] The Project's Class III post-diversion solid waste estimate of 0.45 tpd[51] would represent a small (approximately 0.00008 percent) amount of this residual daily capacity. Hence, the Project's operational solid waste would represent a negligible proportion of the remaining capacity of the Sunshine Canyon Landfill.

As described in the County of Los Angeles Countywide Integrated Waste Management Plan 2018 Annual Report prepared by the County of Los Angeles Department of Public Works, future disposal needs over the next 15-year planning horizon (2033) would be adequately met through the use of in-County and out-of-County facilities through a number of strategies that would be carried out over the years. It should also be noted that with annual reviews of demand and capacity in each subsequent Annual Report, the 15-year planning horizon provides sufficient lead time for the County to address any future shortfalls in landfill capacity.

Solid waste collection services are currently provided to the Project Site by haulers contracted by the City for this service area. The Project Site is located in an urban area with established solid waste collection routes (i.e., private haulers under contract to LASAN). Transport of the Project's

[49] County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan, 2018 Annual Report, December 2019. Page 32.

[50] County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan, 2018 Annual Report, December 2019. Page 68.

[51] The Project's daily disposal in tons assumes that landfills operate six days per week. 52 weeks * 6 days = 312 days. Therefore, the Project's daily disposal is calculated by 141 tons / 312 days = 0.45 tpd.

solid waste would occur along one of the established routes. Thus, the Project would not result in the need for additional solid waste collection routes.

Based on the above, the Project's operational waste generation would not exceed the permitted capacity of disposal facilities serving the Project, and would not alter the ability of the County to address landfill needs via existing capacity and other planned strategies and measures for ensuring sufficient landfill capacity exists to meet the needs of the County. Therefore, the County's City-certified waste processing facilities would have sufficient permitted capacity to accommodate the Project's operational waste disposal needs and impacts would be less than significant. No further analysis of this topic in an EIR or mitigation measures are required.

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

Less Than Significant Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939) which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): 1) source reduction; 2) recycling and composting; and 3) environmentally safe transformation and land disposal. Additionally, the City is currently implementing its "Zero-Waste-to-Landfill" goal to achieve zero waste to landfills by 2025 to enhance the Solid Waste Integrated Resources Planning Process.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that developments include a recycling area or room of specified size on-site. Further, the Project would comply with the City's Construction and Demolition Waste Recycling Ordinance. The Project would also promote compliance with AB 939 and City waste diversion goals by providing source sorted receptacles to facilitate recycling. Since the Project would comply with federal, state, and local statutes and regulations related to solid waste, impacts would be less than significant impact. Therefore, no further analysis of this topic in an EIR or mitigation measures are required.

XX. WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

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

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The Project Site is located in an urbanized area; however, undeveloped parcels in the Project vicinity are landscaped with native and ornamental vegetation. As discussed in Checklist Question IX.g above, while no wildlands are present on the Project Site, the Project Site is located in a VHFHSZ. VHFHSZs are primarily located in the hilly and mountainous regions of the City of Los Angeles where wildland fires originating on brush-covered undeveloped hillsides can be affected by urban development, and vice versa. Development and access within VHFHSZs are regulated by LAMC Section 57.4908. While the provisions of LAMC Section 57.4908 primarily address undeveloped parcels, there are also provisions that prohibit open flames and smoking on developed parcels within a VHFHSZ, as enforced by posted signage, and require that fire clearance areas be maintained around structures.

The urbanized nature of the Project Site and surrounding area, as well as the nature of the Project's building materials would limit the potential for wildland fire hazards. Specifically, the Project would be constructed primarily of concrete, steel, and glass, and would limit the use of flammable building materials that could create a substantial fire risk. Additionally, the Project would comply with existing City Fire Code and other fire safety requirements and would include smoke/fire alarms, fully sprinklered indoor spaces, and irrigated landscaped areas, which would serve to reduce potential hazards related to structure fires (i.e., fires potentially ignited by wildland fires in the hillside areas to the south across the Hollywood Freeway). With implementation of the provisions of the LAMC and other recommendations of the LAFD during the design process, the Project would not create or be subject to significant wildland fire hazards. Therefore, the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan with respect to wildland fire hazards and impacts would be less than significant. No further evaluation of this topic in an EIR and no mitigation measures are required.

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

Less Than Significant Impact. As discussed in Response to Checklist No. XX.a, no wildlands are present on the Project Site, nor are there any wildland areas immediately adjacent to the Project Site. While there are wildlands in the greater Project vicinity, the Project would involve development of Hotel-related uses similar to those currently on the Project Site, which are typical of the urban setting of the immediate Project Site vicinity. These uses do not present conditions or activities that would exacerbate wildfire risks. within addition, implementation of the provisions of the LAMC and other recommendations of the LAFD during the design process would ensure that the Project would not exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. The Project Site is currently developed with existing hotel-related uses and supporting infrastructure. The Project would include similar hotel-related uses and supporting infrastructure on an already developed site that are typical of an urban setting. As discussed under Response to Checklist Questions XX.a-b, the Project Site is not subject to significant wildfire hazards and Project development would not exacerbate fire risks within the Project Site or surrounding area. Further, the Project would not include the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing significant impacts to the environment. As such, impacts would be less than significant impacts and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

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

Less Than Significant Impact. As discussed under Response to Checklist Question X.c, Project implementation has the potential to alter the existing drainage patterns on the Project Site. A hydrology analysis is being prepared to evaluate the change in drainage patterns that would occur with Project implementation, with the results to be included in the EIR. However, there are no wildlands on the Project Site which would preclude the possibility for significant post-wildland fire slope instability or drainage changes. The engineered hillsides within the Project Site would be landscaped similar to that occurring under existing conditions. Further, the slopes within the Project Site are engineered and would remain stable even in the event of a fire on the Project Site. Finally, there are no structures or features that could expose people to significant safety risks downslope of the Project Site, as the downslope area south of the Project Site includes a paved storage lot followed by a local roadway (W.C. Fields Drive). Based on the above, Project development would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage

changes. Therefore, impacts would be less than significant and no further analysis of this issue in an EIR is required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☒	☐	☐	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

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

Potentially Significant Impact. As discussed in this Initial Study, the Project could result in environmental impacts that have the potential to degrade the quality of environment as addressed herein. Potentially affected resources include: Air Quality, Biological Resources, Cultural Resources (Archaeological and Historical Resources), Energy, Geology and Soils (including Paleontological Resources), Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use and Planning, Noise, Public Services (Fire and Police), Transportation, Tribal Cultural Resources, and Utilities (Water Supply/Infrastructure). An EIR will be prepared to analyze and document these potentially significant impacts.

As discussed in Response to Checklist Questions IV above, the potential exists for migratory bird species protected under the MBTA to be nesting in the trees that would be removed during Project construction. The Project would comply with the MBTA to avoid disturbance of nesting birds and to protect nesting birds if they are present on-site during construction. Nonetheless, the EIR will address the Project's potential to impact biological resources, including impacts to special status species and migratory/nesting habitat and corridors.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Potentially Significant Impact. The potential for cumulative impacts occurs when the independent impacts of a given Project are combined with the impacts of related projects in proximity to the Project Site, to create impacts that are greater than those of the Project alone. Related projects include past, current, and/or probable future projects whose development could contribute to potentially significant cumulative impacts in conjunction with a given project.

Each of the topics determined to have the potential for significant impacts in this Initial Study will be subject to further evaluation in the EIR, including evaluation of the potential for cumulatively significant impacts.

With respect to aesthetics, because the Project is a mixed-use project that would be located on an infill site within a TPA, under SB 743, there would be no cumulative aesthetic impacts.

With respect to potential contributions to cumulative impacts for agricultural resources, biological resources (riparian habitat, wetlands, and conflicts with local policies/ordinance/plans), population and housing, mineral resources, public services (Schools, Parks, and Libraries), wastewater, solid waste, and wildfire the Project Site is located in an urbanized area, and like the Project, other development occurring in the area would also constitute urban infill in already densely developed areas. Because no residential uses are proposed, the Project would not result in direct population growth. Any indirect population growth associated with new employees would be an incremental increase within the City that would not be a cumulatively considerable contribution to population and housing, and public services (Schools, Parks, and Libraries) impacts. Also, the Project Site does not contain agricultural, riparian habitat or wetlands, or mineral resources, does not include the development of residential uses, and therefore Project implementation would not be expected to result in a considerable contribution to cumulatively significant impacts on these resources.

Implementation of the Project in combination with the related projects and other projects within the service area of the HWRP would generate additional wastewater that would be treated at HWRP. The HWRP currently treats an average dry weather flow of 275 MGD, for a residual treatment capacity of approximately 175 MGD, and is therefore operating at approximately 61 percent of its design capacity. As such, there is available treatment capacity to support cumulative growth within the City. As discussed previously, the Project would create the need for a fraction of one percent of the remaining capacity of the HWRP and would not result in any significant impacts related to sewer treatment. No new or upgraded treatment facilities would be required. In addition, the potential need for the related projects to upgrade sewer lines to accommodate their wastewater needs is site-specific and there is minimal, if any, direct cumulative relationship between the development of the Project and the related projects. Therefore, no significant

cumulative wastewater impacts are anticipated from the development of the Project with other future related projects.

Regarding solid waste, all development in the City is required to comply with the City's Curbside Recycling Program and the Construction and Demolition Waste Recycling Ordinance to minimize the amount of solid waste generated by the development and the need for landfill capacity. As discussed previously, the landfills serving the Project area have available capacity. The estimated solid waste amount of solid waste generated by the Project would represent approximately 0.007 percent of Sunshine Canyon Landfill's daily residual capacity and would not result in any significant impacts. The Project's contribution to the overall remaining capacity of all in-County and out-of-County landfill facilities would be less a fraction of one percent. Further, the County of Los Angeles Countywide Integrated Waste Management Plan 2018 Annual Report prepared by the County of Los Angeles Department of Public Works, indicated that future disposal needs (which would account for cumulative growth) over the next 15-year planning horizon (2033) would be adequately met. It should also be noted that with annual reviews of demand and capacity in each subsequent Annual Report, the 15-year planning horizon provides sufficient lead time for the County to address any future shortfalls in landfill capacity. Therefore, cumulative solid waste impacts from successive projects of the same type in the same place over time would not be significant.

With regard to wildfire, as with the Project, all developments would be required to comply with existing City Fire Code and other fire safety requirements, which would minimize potential impacts related to wildfires, particularly for projects located in a VHFHSZ. As concluded in the discussion of Project impacts above, the Project would have a less-than-significant impact as it relates to wildfire. Therefore, no significant cumulative wildfire impacts are anticipated from the development of the Project with other future related projects.

Based on the above, Project implementation would not be expected to result in a considerable contribution to cumulatively significant impacts for the environmental topics discussed above. No further discussion of potential cumulative effects for these topics in the EIR is required.

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

Potentially Significant Impact. As discussed in this Initial Study, the Project could result in potentially significant environmental impacts associated with Air Quality, Cultural Resources (Archaeological and Historical Resources), Energy, Geology and Soils (including Paleontological Resources), Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use and Planning, Noise, Public Services (Fire and Police), Transportation, Tribal Cultural Resources, and Utilities (Water Supply/Infrastructure). These impacts could have potentially adverse effects on human beings. Therefore, further analysis of these impacts will be disclosed in the EIR.