

Executive Summary

This Draft Environmental Impact Report (Draft EIR) has been prepared pursuant to the requirements of the California Environmental Quality Act (CEQA, Public Resources Code sections 21000 et. seq.) and in accordance with CEQA Guidelines Section 15123. Accordingly, this chapter of the Draft EIR contains a brief description of the Hilton Universal City Project (Project) and its potential environmental effects. Included in this section is an overview of the purpose and focus of this Draft EIR, a description of the organization of this Draft EIR, general description of the Project and requested entitlements, a general description of areas of controversy known to the lead agency, a description of the public review process for this Draft EIR, a list of the project design features (PDFs) and mitigation measures (MMs) to be implemented as part of the Project, and a summary of the alternatives to the Project evaluated in this Draft EIR, including identification of the Environmentally Superior Alternative.

1. Purpose of this Draft EIR

As described in CEQA Guidelines Sections 15123(a) and 15362, an EIR is an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. Therefore, the purpose of this Draft EIR is to focus the discussion on the Project's environmental effects that the City of Los Angeles (City), as the Lead Agency, has determined to be, or potentially may be significant. In addition, feasible mitigation measures are recommended, when applicable, that could reduce or avoid the Project's significant environmental impacts.

This Draft EIR serves as the environmental document for all actions associated with the Project. This EIR is a "Project EIR" as defined by CEQA Guidelines Section 15161. Furthermore, this Draft EIR complies with CEQA Guidelines Section 15064, which discusses determining the significance of environmental effects caused by a project.

2. Draft EIR Focus and Effects Found Not To Be Significant

In accordance with CEQA Guidelines Section 15128, an EIR shall contain a brief statement indicating reasons that various possible significant environmental effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. An Initial Study was prepared for the Project and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse, Governor's Office of Planning and Research (OPR), responsible agencies, and other interested parties on October 6, 2020 for a 30-day review period. In addition, a public scoping meeting for the Project was held on October 20, 2020. The NOP, Initial Study, Scoping Meeting materials, and NOP

comment letters are included in Appendix A of this Draft EIR (A-1, A-2, A-3, and A-4, respectively). The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is not analyzed further in this Draft EIR. The City determined through the Initial Study the potential for significant impacts in the following environmental issue areas:

- Air Quality (Air Quality Management Plan [AQMP] consistency, criteria pollutant emissions, substantial pollutant concentrations)
- Biological Resources (sensitive species and wildlife movement)
- Cultural Resources (historical and archaeological resources)
- Energy
- Geology and Soils (fault rupture, ground shaking, liquefaction/ground failure, landslides, expansive soil, paleontological resources)
- Greenhouse Gas Emissions
- Hydrology and Water Quality (water quality standards, drainage patterns, water quality control plan/sustainable groundwater management plan conflicts)
- Land Use and Planning (plan/policy consistency)
- Noise (noise increases and groundborne noise and vibration)
- Public Services (fire protection and police protection)
- Transportation (plan/policy/ordinance consistency and vehicle miles traveled)
- Tribal Cultural Resources
- Utilities (water supply and wastewater)

The City determined through the Initial Study that the Project would not have the potential to cause significant impacts related to: Aesthetics, Agricultural Resources, Air Quality (objectionable odors); Biological Resources (riparian habitat, wetlands); Cultural Resources (disturbance of human remains); Geology and Soils (septic systems); Hazards and Hazardous Materials; Hydrology and Water Quality (groundwater, flood hazards); Land Use and Planning (divide an established community); Mineral Resources, Noise (airport land use plan, private airstrip); Population and Housing; Public Services (schools, parks, other public facilities); Recreation; Transportation (change in air traffic patterns and emergency access); Utilities and Service Systems (wastewater treatment capacity and solid waste); and Wildfire.

Therefore, these areas were not analyzed further in this Draft EIR. The Initial Study, which demonstrated that no significant impacts would occur for these issue areas, is included in Appendix A-2 to this Draft EIR.

3. Draft EIR Organization

This Draft EIR is comprised of the following sections:

Executive Summary. This section provides a statement of the purpose of the Draft EIR, a discussion regarding the focus of the analysis included in the Draft EIR and effects found not to be significant, an outline listing the content and organization of the Draft EIR, a brief summary of the Project, areas of controversy and issues to be resolved, a description of the public review process, a summary of alternatives, and a summary of environmental impacts and mitigation measures.

- I Introduction.** This chapter describes the purpose of the EIR, including CEQA compliance requirements, the steps undertaken to date regarding implementation of the CEQA process, and the Draft EIR's organization.
- II Project Description.** This chapter describes the Project location, existing conditions, Project objectives, characteristics of the Project, and requested approvals.
- III Environmental Setting.** This chapter presents an overview of the Project's existing and built environment setting, including on-site and surrounding land uses. This chapter also provides a list of related projects anticipated to be implemented in the vicinity of the Project Site.
- IV Environmental Impact Analysis.** This chapter contains the environmental setting, regulatory framework, methodology, thresholds of significance, Project characteristics and/or PDFs, Project-specific and cumulative impact analyses, mitigation measures, and conclusions regarding the level of significance including after mitigation where mitigation is required, for each of the following environmental issues: (A) Air Quality (AQMP consistency, criteria pollutant emissions, substantial pollutant concentrations); (B) Biological Resources (sensitive species and wildlife movement); (C) Cultural Resources (historical and archaeological resources); (D) Energy; (E) Geology and Soils (fault rupture, ground shaking, liquefaction/ground failure, landslides, expansive soil, paleontological resources); (F) Greenhouse Gas Emissions; (G) Hydrology and Water Quality (water quality standards, drainage patterns, water quality control plan/sustainable groundwater management plan conflicts); (H) Land Use and Planning (plan/policy consistency); (I) Noise (noise increases and groundborne noise and vibration); (J) Public Services (fire protection and police protection); (K) Transportation (plan/policy/ordinance consistency and vehicle miles traveled); (L) Tribal Cultural Resources; and (M) Utilities and Service Systems (water supply and wastewater infrastructure).
- V Alternatives.** This chapter provides an analysis of a reasonable range of alternatives to the Project, including Alternative 1 – No Project/No Build Alternative; Alternative 2 – Surface Parking Alternative; and Alternative 3 – Office Use Alternative.

- VI Other CEQA Considerations.** This chapter provides a discussion of significant unavoidable impacts that would result from the Project and the reasons why the Project is being proposed notwithstanding the significant unavoidable impacts. An analysis of the significant irreversible changes in the environment and potential secondary effects that would result from the Project is also presented here. This chapter also analyzes potential growth-inducing impacts of the Project and potential secondary effects caused by the implementation of the mitigation measures for the Project. Lastly, a summary of the possible effects of the Project that were determined not to be significant within the Initial Study is provided.
- VII List of EIR Preparers and Organizations and Persons Contacted.** This chapter lists the persons, public agencies, and organizations that were consulted or who contributed to the preparation of this Draft EIR.
- VIII References.** This chapter lists the references and sources used in the preparation of this Draft EIR.

The Environmental Analyses in this Draft EIR are supported by the following appendices:

- Appendix A – Notice of Preparation (NOP), Initial Study, Scoping Meeting Materials, and NOP and Scoping Meeting Comments
 - A-1 Notice of Preparation
 - A-2 Initial Study
 - A-3 Scoping Meeting Materials
 - A-4 NOP Comments
- Appendix B – Air Quality/Greenhouse Gas Emissions Technical Documentation
- Appendix C – Biological Resources Documentation
- Appendix D – Cultural Resources Assessment Report
- Appendix E – Geotechnical and Paleontological Resources Documentation
 - E-1 Geotechnical Investigation
 - E-2 Paleontological Resources Assessment Report
- Appendix F – Energy Calculation Worksheets
- Appendix G – Hydrology and Water Quality Report
- Appendix H – Land Use Plans and Policies: Project Consistency Tables
- Appendix I – Noise and Vibration Technical Appendix
- Appendix J – Public Service Provider Correspondence
 - J -1 Los Angeles Fire Department Correspondence
 - J -2 Los Angeles Police Department Correspondence

- Appendix K – Transportation Assessment
 - K-1 2020 Transportation Assessment
 - K-2 2020 LADOT Correspondence Approving the Transportation Assessment
 - K-3 2022 Transportation Analysis Addendum
 - K-4 2023 Transportation Analysis Addendum
 - K-5 Alternative 3 VMT Calculator Results with TDM
- Appendix L – Tribal Cultural Resources Technical Report
- Appendix M – Utilities Documentation
 - M-1 Utility Infrastructure Technical Report
 - M-2 Water Supply Assessment
 - M-3 LADWP WSA Correspondence

4. Existing Project Site Conditions

The Project site (Assessor's Parcel Number 2424-044-022) is located at 555 Universal Hollywood Drive in Universal City, (Project Site) immediately north of U.S. Highway 101 (US-101 or Hollywood Freeway). The Project Site is located west of the intersection of Universal Hollywood Drive and Hotel Drive. The Project Site is located in the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan Area of the City of Los Angeles.

The Project Site is developed with a hotel and associated improvements. The primary on-site improvements (described from north to south) consist of: (a) a motorcourt and porte cochere entryway to an ancillary hotel building and landscaping; (b) a low-rise ancillary hotel building; (c) a motorcourt with Americans with Disabilities Act (ADA)-accessible parking spaces, a landscaped median, and a porte cochere entryway to the hotel lobby area; (d) the hotel building; and (e) an outdoor pool area.

The Project Site has a land use designation of Regional Center Commercial (Pre-Framework). Regional Centers are defined by the General Plan Framework Element as a focal point of regional commerce, identity, and activity that contain 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.

According to the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan General Plan Land Use Map, the Regional Center Commercial (Pre-Framework) land use designation has corresponding zoning designations of Limited Commercial (C2 and C4) and Multi-Family Residential (RAS3, RAS4, P, and PB).

The Project Site has three zoning designations, with the central portion of the Project Site 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 floor-to-area ratio of 1.5:1. The portion of the Project Site peripheral to the existing hotel buildings is assigned a zoning designation of PB-1 (Parking Building, Height District 1). The PB Zone permits structured automobile parking, including structures that 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 building height of two stories but does not otherwise specify a maximum building height. A small trapezoidal area of the Project Site 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 floor-to-area ratio of 3.0:1. The Project, which has a floor-to-area ratio of approximately 2.2:1, located on an infill site, and is located on property zoned for commercial uses, qualifies as an employment center project.¹ The Project Site is located entirely within a Transit Priority Area (TPA), as defined by the City, given its proximity to regional transportation facilities in the Project vicinity, including the Metro B Line (Red Line) Universal City/Studio City Station, located approximately 0.25 miles to the west of the Project Site.

5. Description of the Project

The Project proposes to expand the existing Hilton Universal City Hotel facilities located within the approximately 7.26-acre Project Site. The Project Site is currently developed with a 24-story hotel building with an overall height of 258 feet above grade containing 495 guestrooms (Existing Hotel Building), an attached ancillary hotel building providing meeting/banquet rooms and ancillary hotel uses (Existing Ancillary Hotel Building), a three-level parking garage, vehicular circulation facilities (i.e., internal driveway and service road), an outdoor pool area (Existing Outdoor Pool Area), and pedestrian walkways and landscaped areas in both the north and south plazas (Existing North Plaza and Existing South Plaza), which provide access and gathering space for the north and south entryways, respectively, on the main hotel entry level.

The Project would involve construction of a new 18-story, approximately 295,688-square-foot hotel building (Hotel Expansion Building) with a maximum height of approximately 222 feet above grade containing 395 guestrooms, a new lobby, three restaurants (including bars) and a bar and lounge space, a spa, a new outdoor pool area on the roof, and a new outdoor pool area on the Basement Level on the southern portion of the Project Site. A new, approximately 2,300-square-foot steel frame canopy with glass and steel design features would be constructed above the main entrance of the Hotel Expansion

¹ “‘Employment center project’ means 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(a)(1)]

Building. An existing, undeveloped, approximately 3,149 square-foot sub-basement in the southwest corner of the existing parking garage would be developed to house mechanical, engineering, and plumbing equipment for the Hotel Expansion Building. The Project would also expand the northern portion of the Existing Ancillary Hotel Building to include a one-story meeting room addition (Meeting Room Addition) of approximately 3,400 square feet, which would consist of four separate meeting rooms of less than 750 square feet each and a connecting hallway. The Project would also involve constructing a horizontal and vertical expansion of the existing parking garage. In addition, the Project would include a revised surface parking program, new retaining walls along the eastern side of the Project Site, a new fenced area of approximately 2,000 square feet for electrical transformers and switchboards, and landscape and hardscape improvements throughout much of the Project Site. 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.

Overall, the Project would add approximately 299,088 square feet of additional floor area to the Project Site. The Project would provide approximately 464 new vehicle parking spaces to accommodate additional employees, hotel guests, and restaurant/spa visitors. Upon completion of the Project, the Hilton Universal City Hotel (referred to in entirety as "Hotel"), which includes existing uses to remain and all proposed Project features, would provide a maximum of 890 guestrooms and approximately 696,609 square feet of total floor area, resulting in a floor-to-area ratio of approximately 2.20:1 for the Project Site.

Discretionary entitlements, reviews, and approvals required for implementation of the Project would include, but not necessarily 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 for the entire Property.
- Pursuant to LAMC Section 12.24 W.1, a Conditional Use Permit for the sale or dispensing of alcoholic beverages for on-site consumption within the Hotel's guestrooms through room service and in-room control access cabinets (mini-fridges), at the restaurant dining and pool area on Level 18, lounge and bar on Level 4, restaurant on Level 3, the pool restaurant and bar on the Basement Level, Meeting Room Addition, and spa in accordance with the Project's hours of operation identified in Section 6.h of this Draft EIR.
- Pursuant to LAMC Section 12.24 W.18, a Conditional Use Permit to allow for dancing and live entertainment during events within the Meeting Room Addition, areas adjacent to the lobby/lounge area on Level 4, and areas adjacent to the restaurants/dining areas on Level 3 and Level 18 of the Hotel Expansion Building.
- Pursuant to LAMC Section 16.05, Site Plan Review for a development that results in an increase of 50 guestrooms.

- Haul route approval from the Los Angeles Department of Building and Safety, Board of Building and Safety Commissioners.
- 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, Department of Public Works approval to remove non-protected trees from the Property, and sign permits.

In addition to the entitlements identified above, permits are also required from other City entities for the Project, including, but not limited to, permits from the Department of Building and Safety and Public Works (and other municipal agencies) for Project construction activities, such as demolition, haul route, excavation, shoring, grading, foundation, building and interior improvements, and the removal and replacement of trees on public and/or private property. Beyond the environmental requirements being carried out in association with this Draft EIR, to the extent known, there are no other related federal, state, or local environmental review and consultation requirements that need to be integrated with this CEQA review.

6. Areas of Controversy

Potential areas of controversy and issues to be resolved by the City's decision-makers may include those environmental issue areas where the potential for significant and unavoidable impacts has been identified. In addition, issues raised during the public scoping meeting and NOP comment period include: aesthetics (change in views and architectural design); air quality (consistency with South Coast Air Quality Management District [SCAQMD] analysis, mitigation and permitting requirements); biological resources (adherence to California Department of Conservation's comments/recommendations on tree removal, nesting birds and impacts from invasive species and addressing of general CDFW procedures for biological review); and transportation (pedestrian safety, multi-model and complete streets transportation elements, Vehicle Miles Travelled (VMT) analysis and Transportation Demand Management (TDM) strategies (refer to Appendix A-4 for copies of NOP comment letters received). All of these issues were evaluated in this Draft EIR or the Initial Study prepared for the Project (included in Appendix A-2 of this Draft EIR). Based on the analysis in Section IV, *Environmental Impact Analysis*, of this Draft EIR, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with regard to on-site construction noise (Project-level and cumulative impacts) and cumulative off-site construction traffic-related noise.

7. Public Review Process

The City prepared an Initial Study and circulated an NOP for public comments to the State Clearinghouse, OPR, responsible agencies, and other interested parties on October 6, 2020 for a 30-day review period. The City also carried out a public scoping meeting for the Project on October 20, 2020. The NOP, Initial Study, Scoping Meeting Materials, and

NOP comment letters are included as Appendices A-1 through A-4, respectively, of this Draft EIR.

This Draft EIR is being circulated for a 60-day comment period. Following the public comment period, a Final EIR will be prepared that will include responses to the comments submitted to the City regarding this Draft EIR.

8. Summary of Environmental Impacts

This section summarizes the environmental impacts of the Project as evaluated in Chapter IV, *Environmental Impact Analysis*, of this Draft EIR. The summary is provided by environmental issue area below in **Table ES-1, Summary of Project Impacts**. Following Table ES-1, the Project's proposed PDFs and required MMs are listed.

**TABLE ES-1
SUMMARY OF PROJECT IMPACTS**

Environmental Issue	Project Impact
IV.A AIR QUALITY	
Consistency with applicable Air Quality Plan	
<i>Construction</i>	Less Than Significant with Mitigation
<i>Operation</i>	Less Than Significant
Cumulatively Considerable Increase of Criteria Pollutant in Nonattainment Area: Regional Emissions	
<i>Construction</i>	Less Than Significant with Mitigation
<i>Operation</i>	Less Than Significant
Sensitive Receptor Exposure to Pollutant Concentrations: Localized Emissions	
<i>Construction</i> ¹	Less Than Significant
<i>Operation</i>	Less Than Significant
Sensitive Receptor Exposure to Other Emissions Such as Odors	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
IV.B BIOLOGICAL RESOURCES	
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 CDFW or USFWS	
<i>Construction</i> ²	Less Than Significant with Mitigation
<i>Operation</i>	Less Than Significant with Mitigation

**TABLE ES-1
SUMMARY OF PROJECT IMPACTS**

Environmental Issue	Project Impact
Adverse Effect on any Riparian Habitat or Other Sensitive Natural Community	
<i>Construction</i>	No Impact
<i>Operation</i>	No Impact
Adverse Effect on State or Federally Protected Wetlands	
<i>Construction</i>	No Impact
<i>Operation</i>	No Impact
Interfere Substantially with the Movement of any Native Resident or Migratory Fish or Wildlife	
<i>Construction</i>	Less Than Significant with Mitigation
<i>Operation</i>	Less Than Significant
Conflict With Any Local Policies or Ordinances Protecting Biological Resources, Such as a Tree Preservation Policy or Ordinance	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Conflict With the Provisions of an Adopted Habitat Conservation Plan, Natural Community Conservation Plan	
<i>Construction</i>	No Impact
<i>Operation</i>	No Impact
IV.C CULTURAL RESOURCES	
Cause a change in the significance of a historical resource	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Cause a Change In The Significance Of An Archaeological Resource	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Disturb human remains	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant

**TABLE ES-1
SUMMARY OF PROJECT IMPACTS**

Environmental Issue	Project Impact
IV.D ENERGY	
Wasteful, inefficient, and unnecessary consumption of energy resources	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Conflict or obstruct a state or local plan for renewable energy or energy efficiency	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
IV.E GEOLOGY AND SOILS	
Hazardous geologic conditions	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Soil erosion or loss of topsoil	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	No Impact
Unstable geologic unit or soils	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	No Impact
Expansive soils	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	No Impact
Use of septic tanks or alternative wastewater disposal systems	
<i>Construction</i>	No Impact
<i>Operation</i>	No Impact
Paleontological Resources	
<i>Construction</i>	Less Than Significant with Mitigation
<i>Operation</i>	No Impact
IV.F GREENHOUSE GAS EMISSIONS	
Greenhouse gas emissions generation	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant

**TABLE ES-1
SUMMARY OF PROJECT IMPACTS**

Environmental Issue	Project Impact
Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGS	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
IV.G HYDROLOGY AND WATER QUALITY	
Violate Water Quality Standards	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Substantially decrease groundwater supplies	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Alteration of the existing drainage pattern	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Risks due to inundation	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Conflict with implementation of a Water Quality Control Plan or Sustainable Groundwater Management Plan	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
IV.H LAND USE AND PLANNING	
Division of an established community	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant

**TABLE ES-1
SUMMARY OF PROJECT IMPACTS**

Environmental Issue	Project Impact
IV.I NOISE	
Substantial temporary or permanent increase in ambient noise levels	
<i>Construction</i> ³	Significant and Unavoidable Impact (On-Site Construction Noise – Project-level and Cumulative Impacts) Significant and Unavoidable Impact (Off-Site Construction Noise – Cumulative Impacts)
<i>Operation</i>	Less Than Significant
Groundborne vibration and groundborne noise	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Expose people to excessive noise levels from proximity to an airport	
<i>Construction</i>	No Impact
<i>Operation</i>	No Impact
IV.J PUBLIC SERVICES	
Fire protection	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Police Protection	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
IV.K TRANSPORTATION	
Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Conflict or be inconsistent with CEQA guidelines section 15064.3, Subdivision (b) - Vehicle Miles Traveled (VMT)	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant

**TABLE ES-1
SUMMARY OF PROJECT IMPACTS**

Environmental Issue	Project Impact
Geometric hazards	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Emergency access	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
IV.L TRIBAL CULTURAL RESOURCES	
Tribal Cultural Resources	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
IV.M UTILITIES AND SERVICE SYSTEMS	
WATER SUPPLY	
Water infrastructure	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Sufficiency of water supply	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
WASTEWATER	
Wastewater infrastructure	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
Wastewater treatment capacity	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant

¹ As discussed in Section IV.A, Air Quality, of this Draft EIR, cumulative impacts related to regional construction NOx emissions would be Less Than Significant with implementation of AQ-MM-1.

² As discussed in Section IV.B, Biological Resources of this Draft EIR, cumulative impacts related to special-status wildlife (bat) species would be Less Than Significant with implementation of BIO-MM-1.

³ As discussed in Section IV.I, Noise, of this Draft EIR, cumulative impacts related to construction noise would be Less Than Significant with implementation of Mitigation Measures NOI-MM-1 and NOI-MM-2.

SOURCE: ESA, 2023.

As noted in Table ES-1 and evaluated in detail in Section IV.I, *Noise*, of this Draft EIR, and summarized below, implementation of the Project would result in significant impacts that cannot be mitigated with respect to Project-level and cumulative on-site and off-site noise sources during construction.

On-Site Construction Noise (Project-Level): Mitigation Measure NOI-MM-1 provides for construction noise barriers that would achieve a noise reduction of a minimum 15 dBA along the western boundary of the Project Site at Levels 1 through 5 of the Sheraton Hotel guest rooms (receptor location R1). Construction noise impacts would be less than significant for receptor location R2 without implementation of a noise barrier due to the receptor's distance from the Project Site and difference in elevation. Receptor locations R1 (Sheraton Hotel levels 6 through 17) and R3 through R5 would not benefit from implementation of a noise barrier because the receptors are at a higher elevation than the Project Site and would have a direct line-of-sight to the construction area. Therefore, noise impacts from on-site construction at receptor locations R1 (Sheraton Hotel levels 6 through 17) and R3 through R5 would not be reduced to less than significant with implementation of Mitigation Measure NOI-MM-1 and, as such, noise barrier reductions were not applied to receptor locations R1 (Sheraton Hotel levels 6 through 17) through R5. The noise barriers required under Mitigation Measure NOI-MM-1 for receptor location R1 (Sheraton Hotel levels 1 through 5) shall be in-place during early Project construction phases (through completion of architectural coating) and during paving when heavy equipment is used. Mitigation Measure NOI-MM-2 requires the use of power construction equipment with properly operating and maintained noise shielding and muffling devices, consistent with manufacturers' specifications, including requiring the contractor to use muffler systems that provide a minimum reduction of 8 dBA compared to the same equipment without an installed muffler system, reducing maximum construction noise levels. No impact pile driving shall be utilized; however, vibratory, augered, or drilled piles would be permitted (Project Design Feature NOI-PDF-3).

Implementation of Mitigation Measures NOI-MM-1 and NOI-MM-2 would reduce the Project's on-site construction noise impacts at certain off-site noise sensitive receptors, to the extent technically feasible. Specifically, the mitigation measures would reduce construction noise levels by a minimum of 15 dBA at five levels of receptor location R1 (Sheraton Hotel Levels 1 through 5). Construction noise levels at receptor location R2 would be less than significant without mitigation, and receptor locations R1 (Sheraton Hotel levels 6 through 17) and R3 through R5 would not benefit from noise barriers. Consequently, with implementation of technically feasible mitigation measures, construction noise impacts at noise-sensitive receptor locations R1 (Sheraton Hotel levels 6 through 17) and R3 through R5 would exceed the significance threshold temporarily during certain months of construction, when there would be multiple simultaneous construction activities and some equipment used near the periphery of the Project Site. Construction noise impacts would be lower than peak levels when equipment is used in the interior portions of the Project Site, with equipment noise reduced (attenuating) at a rate of at least 6 dBA per doubling of distance between the equipment and the sensitive

receptor. The mitigated noise levels conservatively assume that the loudest equipment used during the various construction stages and construction activities would be located on the Project Site in the applicable construction work area for the construction activity at the nearest distance to the sensitive receptor location. There are no other feasible mitigation measures that could be implemented to reduce the temporary noise impacts from on-site construction. Therefore, construction noise impacts associated with on-site noise sources would remain significant and unavoidable.

On-Site Construction Noise (Cumulative): Cumulative construction noise impacts associated with on-site construction equipment could be significant in the event that construction activities as part of a related project occurs within 1,000 feet of the Project Site. The 1,000-foot distance is based on a screening distance identified in the 2006 L.A. CEQA Thresholds Guide of 500 feet from two different construction sites. Only one related project (Related Project No.1) is located within 1,000 feet of the Project Site as described in Section IV.I, *Noise*, of this Draft EIR. The southwestern portion of Related Project No. 1 is within 500 feet of both the Project Site and the Sheraton Hotel property (receptor location R1). The Project would implement Mitigation Measures NOI-MM-1 and NOI-MM-2 to reduce certain on-site construction noise impacts. Implementation of these mitigation measures would reduce the Project's construction noise impacts at the lower five levels of the Sheraton Hotel (receptor location R1 Levels 1 through 5); however, construction noise impacts at receptor location R1 (Levels 6 through 17) would continue to be significant. Project impacts to receptor location R2 would be less than significant without mitigation and impacts to receptor locations R3 through R5 would be less than significant with mitigation. Although it is expected that Related Project No.1 would implement mitigation that would reduce construction noise impacts similar to the Project, overlapping construction activities could result in significant cumulative impacts. The Project and Related Project No. 1 could contribute to construction noise at receptor location R1 that may exceed the significance threshold. Thus, if the construction activities overlap, the Project's contribution to cumulative construction noise associated with on-site construction equipment would be cumulatively considerable and would represent a significant and unavoidable cumulative impact at receptor location R1. Receptor locations R2 through R5 are located more than 1,000 feet of Related Project No.1, which exceeds the screening distance; therefore, cumulative impacts would not occur at these locations.

Off-Site Construction Noise – Mobile Sources (Cumulative): The Project would not result in any significant off-site construction noise impacts due to construction trips in excess of standards established by the City. However, cumulative construction noise impacts associated with off-site construction truck traffic from multiple related projects could potentially overlap with the Project on some days and generate noise in excess of the significance threshold if the related projects contribute more than 61 truck trips per hour at the same time as the Project's maximum truck trips of 50 per hour. No feasible mitigation measures are available for the Project to implement to further reduce impacts. Residential land uses comprise the majority of existing sensitive uses within the vicinity of the Project Site that could be impacted by the increase in construction traffic generated

noise levels. Construction of sound barriers would be inappropriate and infeasible for residential land uses that face the roadway as it would create aesthetic and access concerns. Thus, it is conservatively concluded that the Project's contribution to cumulative construction noise associated with off-site construction truck traffic along the haul route would be cumulatively considerable and would represent a significant and unavoidable cumulative impact.

9. Project Design Features

The following PDFs would be implemented as part of the Project.

a) Greenhouse Gas Emissions

GHG-PDF-1: Green Building Features. The Project will include the following green building features:

- The Project's buildings will be designed to achieve the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Gold Certification or equivalent and will be designed and operated to meet or exceed the applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code.

b) Noise

NOI-PDF-1: Construction Equipment Maintenance. During plan check for each phase of the Project, the contractor will provide a statement to the City indicating their powered construction equipment (including combustion engines), fixed or mobile, will be properly maintained to ensure that no additional noise, due to worn or improperly maintained parts, would be generated.

NOI-PDF-2: Mechanical Equipment Noise. All outdoor mounted building mechanical equipment and/or ventilation systems not fully enclosed will be designed to not exceed the noise level limits specified in the LAMC through the use of quiet fans, duct silencers, parapets, enclosures, mufflers, or similar noise attenuation methods.

NOI-PDF-3: Impact Pile Drivers Prohibited. The Project will not require or allow the use of impact pile drivers. Lower noise- and vibration-generating augured, drilled, or vibratory piles will be permitted.

c) Public Services – Police Protection

POL-PDF-1: Security Features During Construction. During construction, on-site security measures will include security lighting and a construction security fence with gated and locked entry around active construction areas.

POL-PDF-2: Operational Security Features. During operation, the Hotel would continue to implement its comprehensive 24 hours per day/seven days per week security program, which includes comprehensive coverage and monitoring of key areas through closed circuit television (CCTV), electronically controlled and locking access cards for non-public areas, full time 24-hour, security provided by Hotel staff at the front desk and security personnel. Security personnel duties include, but are not 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 Project Site. Initial alarms such as intruder alarms or duress alarms will be the responsibility of site security personnel as first responders. Access to the parking garage will be controlled by an electronic access gate and is monitored by CCTV.

d) Transportation

TRAF-PDF-1: Transportation Demand Management Program. The Applicant will implement a TDM Program for the Hotel Expansion Building and Meeting Room Addition aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. The Existing Hotel Building currently implements these four strategies and will continue to do so upon completion of the Project. The strategies in the TDM Program will include:

- **Transit Subsidies:** Transit fare subsidies will be proactively offered to each employee at least once annually for a minimum of five years. At the time of initial opening, the Project will offer a daily transit subsidy to all employees. This TDM strategy is currently implemented by the Existing Hotel Building and will continue to be upon completion of the Project.
- **Promotions and Marketing:** The Project will utilize promotional and marketing tools to educate and inform employees about alternative transportation options and the effects of their travel choices. Rather than two-way communication tools or tools that would encourage an individual to consider a different mode of travel at the time the trip is taken (i.e., smartphone application, daily email, etc.), this TDM strategy includes passive educational and promotional materials, such as posters, information boards, or a website with information that employees can choose to read at their own leisure. This TDM strategy is currently implemented by the Existing Hotel Building and will continue to be upon completion of the Project.
- **Include Bicycle Parking per the Los Angeles Municipal Code:** Table 12.21 A.16(a)(2) in the LAMC provides the required short-term and long-term bicycle parking spaces for the Project. The Project will provide the LAMC-required number of short-term and long-term bicycle parking spaces on-site.

The bicycle parking ratios for both short term and long term are as follows:

- Hotel (395 guestrooms): 1 space per 20 guestrooms (20 spaces);

- Restaurant (11,933 s.f.): 1 space per 2,000 s.f. (6 spaces);
- Bar and Lounge (1,590 s.f.): 1 space per 2,000 s.f. (2 spaces²);
- Spa (8,630 s.f.): 1 space per 2,000 s.f. (4 spaces); and
- Meeting Rooms (3,400 s.f.): 1 space per 10,000 s.f. (2 spaces³).

The long-term bicycle parking ratios are as follows:

- Hotel (395 guestrooms): 1 space per 10 guestrooms (40 spaces);
- Restaurant (11,933 s.f.): 1 space per 2,000 s.f. (6 spaces);
- Bar and Lounge (1,590 s.f.): 1 space per 2,000 s.f. (2 spaces⁴)
- Spa (8,630 s.f.): 1 space per 2,000 s.f. (4 spaces); and
- Meeting Rooms (3,400 s.f.): 1 space per 10,000 s.f. (2 spaces⁵).

Based on the above, the Project is required to provide 54 short-term and 54 long-term bicycle parking spaces, for a total of 108 bicycle parking spaces. The Project will provide 54 short-term and 64 long-term bicycle parking spaces (10 more than required by the LAMC).

- **Include Secure Bicycle Parking and Showers:** This strategy involves implementation of additional end-of-trip bicycle facilities to support safe and comfortable bicycle travel by providing amenities at destinations. This strategy applies to projects that include bicycle parking on-site per the LAMC. As noted above, the long-term bicycle parking would be secured from the general public in accordance with LAMC Section 12.21 A.16(d)(2). In addition, the Project will ensure showers will be provided for employees within the Existing Hotel Building in accordance with LAMC Section 91.6307.

TRAF-PDF-2: Construction Management Plan. Prior to the issuance of a demolition permit or building permit for the Project, a detailed Construction Management Plan (CMP), including street closure information, traffic management strategies, detour plans, haul routes and a staging plan, will be prepared and

² While the calculation would yield a requirement of one short-term bicycle parking space, Table 12.21 A.16(a)(2) states that a minimum of two short-term bicycle parking spaces are required for a bar/lounge use.

³ While the calculation would yield a requirement of one short-term bicycle parking space, Table 12.21 A.16(a)(2) states that a minimum of two short-term bicycle parking spaces are required for all other commercial uses not identified in Table 12.21 A.16(a)(2), including the Project's Meeting Room Addition.

⁴ While the calculation would yield a requirement of one long-term bicycle parking space, Table 12.21 A.16(a)(2) states that a minimum of two long-term bicycle parking spaces are required for a bar/lounge use.

⁵ While the calculation would yield a requirement of one long-term bicycle parking space, Table 12.21 A.16(a)(2) states that a minimum of two long-term bicycle parking spaces are required for all other commercial uses not identified in Table 12.21 A.16(a)(2), including the Project's Meeting Room Addition.

submitted to the City for review and approval. The CMP will formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CMP will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site and will include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation;
- Ensure that access will remain unobstructed for land uses in proximity to the Project Site during Project construction.
- Coordinate with the City and emergency service providers to ensure adequate access, including emergency access, is maintained to the Project Site and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with LAFD, as necessary.
- Prohibition of construction worker or equipment parking on adjacent streets;
- Prohibition of haul truck staging on any streets adjacent to the Project, unless specifically approved as a condition of an approved haul route;
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding Arterial Streets;
- Containment of construction activity within the Project Site boundaries;
- Implementation of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;
- Scheduling of construction-related deliveries, haul trips, etc., to occur outside the commuter peak hours;
- Spacing of trucks so as to discourage a convoy effect;
- Sufficient watering of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind;
- Maintenance of a log, available on the job site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day; and
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities posted at the site readily visible to any interested party during site preparation, grading, and construction.

e) Utilities and Service Systems – Water Supply

WS-PDF-1: Water Conservation Features. The Project will provide the following specific water efficiency features:

- Fixtures for the entire Project
 - High Efficiency Toilets with a flush volume of 1.0 gallons per flush, or less
 - High-efficiency Energy Star-rated commercial dishwashers
 - Showerheads with a flow rate of 1.5 gallons per minute, or less
 - Waterless Urinals
- Landscape and irrigation
 - 80 percent California Friendly® plants
 - Artificial Turf on all turf areas
 - Drip/Subsurface Irrigation (Micro-Irrigation)
 - Landscaping contouring to minimize precipitation runoff
 - Micro-Spray
 - Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together)
 - Rotating Sprinkler Nozzles for Landscape Irrigation – 0.5 gallon per minute
- Pool
 - Install a meter on the pool make-up line so water use can be monitored and leaks can be identified and repaired
 - Leak Detection System for swimming pools and Jacuzzi
 - Water-Saving Pool Filter

10. Mitigation Measures

The following MMs would be required and implemented as part of the Project.

a) Air Quality

AQ-MM-1: Construction Equipment Features: The Applicant shall implement the following construction equipment features for equipment operating at the Project Site. These features shall be included in applicable bid documents, and successful contractor(s) must demonstrate the ability to supply such equipment. Construction features shall include the following:

- The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and United States Environmental Protection Agency (USEPA) Tier 4 Final off-road

- emissions standards or equivalent for equipment rated at 50 horsepower (hp) or greater during Project construction where available within the Los Angeles region. Such equipment shall be outfitted with Best Available Control Technology (BACT) which means a CARB certified Level 3 Diesel Particulate Filter or equivalent.
- During plan check, the Project's representative shall make available to the lead agency and South Coast Air Quality Management District (SCAQMD) a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that shall be used during any of the construction phases. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each such unit's certified tier specification, best available control technology (BACT) documentation, and CARB or SCAQMD operating permit shall be maintained on-site at the time of mobilization of each applicable unit of equipment.
 - During demolition, site preparation, and grading and excavation activities, the contractor shall provide notification and documentation that haul truck drivers have received training regarding idling limitations specified in Title 13 California Code of Regulations, Section 2485, and that haul trucks limit idling for loading and unloading activities to 5 minutes at a location.
 - Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications. The contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications. Tampering with construction equipment to increase horsepower or to defeat emission control devices shall be prohibited.
 - Construction activities shall be discontinued during second-stage smog alerts. A record of any second-stage smog alerts and of discontinued construction activities as applicable shall be maintained by the Contractor on-site.

b) Biological Resources

BIO-MM-1: Due to the presence of potentially suitable roosting and foraging habitat (palms) for western mastiff bat, western yellow bat, silver-haired bat, and Townsend's big-eared bat, the Project shall carry out the following steps and to the satisfaction of the City:

- Any construction or palm removal activities that occur during the maternity roosting season for special-status bat species (March 1 through September 30) shall require a qualified biologist to conduct a pre-construction or palm removal survey, using sonic bat detectors (e.g., Anabat) and night vision goggles for an emergence survey (for at least one-hour after sunset) to determine whether special-status bat species are roosting within palms that would be removed. The surveys shall be conducted at dusk and after nightfall by a biologist. A qualified biologist is a biologist with specialized bat experience including the

- familiarity with bat roost biology (i.e., a professional biologist with a minimum of two years of bat survey experience, inclusive of acoustic survey experience).
- If an active roost site is located during the pre-construction survey, the roost shall be avoided and Project construction activities shall be conducted as recommended by the biologist to avoid the area, which may include temporary postponement of activities or provision of a suitable buffer around the roost until roosting activities cease.
 - A report shall be submitted to the City with the results of the pre-construction or tree removal survey and any needed maternity roost avoidance actions prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats. If special-status bats are detected during the survey, a qualified bat specialist shall prepare species specific mitigation measures to reduce or avoid impacts to each special-status species detected. Mitigation may include avoidance through postponing or temporarily halting construction until maternal roost use is completed, use of construction buffers of no less than 100-feet, or the installation of bat boxes in proximity to detected maternal roosts. Avoidance measures shall be based on site-specific factors to prevent roost disturbances; including but not limited to numbers and locations of bats, proposed construction activities, height and distance of bat roosts from proposed construction activities, the presence of visual and/or acoustic barriers between the roost and proposed activities, and the pre-existing level of human activities (e.g., ambient noise, potential movement, etc.) to which the bats may already tolerate.
 - If special-status bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year and could roost in palms at a given location, removal activities will be initiated by pushing palms using heavy machinery prior to using a chainsaw to remove the tree. In order to provide the optimum warning to any roosting special-status bats that may be present, palms shall be pushed lightly two or three times, with an approximately 30-second pause between each nudge/push to allow bats to become active. A period of at least 24 hours shall elapse between such operations to allow special-status bats to escape the construction area.

c) Geology and Soils (Paleontological Resources)

PALEO-MM-1: Retention of a Qualified Paleontologist. A Qualified Paleontologist meeting the Society of Vertebrate Paleontology Standards (SVP, 2010) (Qualified Paleontologist) shall be retained prior to the approval of demolition or grading permits. The Qualified Paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources, shall attend the Project kick-off meeting and Project progress meetings on a regular basis, and shall report to the Project Site in the event potential paleontological resources are encountered.

PALEO-MM-2: Construction Worker Paleontological Resources Sensitivity Training. The Qualified Paleontologist shall conduct construction worker paleontological resources sensitivity training at the Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.). In the event construction crews are phased, additional training shall be conducted for new construction personnel. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the Project Site and the procedures to be followed if they are found. Documentation shall be retained by the Qualified Paleontologist demonstrating that the appropriate construction personnel attended the training.

PALEO-MM-3: Paleontological Resources Monitoring. Paleontological resources monitoring shall be performed by a qualified paleontological monitor (meeting the standards of the SVP, 2010) under the direction of the Qualified Paleontologist. Paleontological resources monitoring shall be conducted for all ground disturbing activities in previously undisturbed sediments which have high sensitivity for encountering paleontological resources (Upper Topanga Formation, which encompasses the entire Project Site). However, depending on the conditions encountered, full-time monitoring can be reduced to part-time inspections or ceased entirely if determined adequate by the Qualified Paleontologist. The Qualified Paleontologist shall spot check the excavation on an intermittent basis and recommend whether the depth of required monitoring needs to be revised based on his/her observations. Monitors shall have the authority to temporarily halt or divert work away from exposed fossils or potential fossils. Monitors shall prepare daily logs detailing the types of activities and soils observed and any discoveries. Any significant fossils collected during Project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage. The Qualified Paleontologist shall prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the monitoring effort and any discoveries. If there are significant discoveries, fossil locality information and final disposition shall be included with the final report, which shall be submitted to the appropriate repository and the City.

d) Noise

NOI-MM-1: Noise Barriers. The Project shall provide a temporary 20-foot-tall construction noise barrier equipped with noise blankets or equivalent noise reduction materials rated to achieve sound level reductions of at least 15 dBA along the western boundary of the Hilton Property from the start of demolition through the completion of architectural coating activities. The barrier shall be placed on top of the Project parking structure at the same level as the existing Project building entrance.

NOI-MM-2: Construction Equipment Noise Shielding and Muffling Devices. Contractors shall ensure that all construction equipment, fixed or mobile, are

equipped with properly operating and maintained noise shielding and muffling devices, consistent with manufacturers' specifications. The construction contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturers' specifications. The contractor shall use muffler systems that provide a minimum reduction of 8 dBA compared to the same equipment without an installed muffler system, reducing maximum construction noise levels. The contractor shall also keep documentation on-site prepared by a noise consultant verifying compliance with this measure.

11. Summary of Alternatives

This Draft EIR examined three alternatives to the Project in detail, which include: Alternative 1: the No Project/No Build Alternative; Alternative 2: the New Parking Garage Alternative, and Alternative 3: the Office Use Alternative. A general description of these alternatives is provided below. Refer to Chapter V, Alternatives, of this Draft EIR for a more detailed description of these alternatives, a comparative analysis of the impacts of these alternatives with those of the Project, and a description of the alternatives considered but rejected as infeasible.

a) Alternative 1: No Project/No Build Alternative

In accordance with the CEQA Guidelines, Alternative 1, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states that, "in certain instances, the No Project/No Build Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for the purpose of this Draft EIR analysis, Alternative 1 assumes that no new development associated with the Project would occur within the Project Site. The Existing Hotel Building would remain as under the existing uses and condition.

As discussed in subsection 6.b)(3) in Chapter V, *Alternatives*, of this Draft EIR, Alternative 1 would avoid the Project's significant and unavoidable impacts associated with on-site construction noise. Alternative 1 would also avoid the Project's significant cumulative impacts that cannot be feasibly mitigated with regard to on-site construction noise and off-site construction noise – mobile sources. All other environmental impacts, with the exception of water quality standards and altering existing drainage, would be less than the Project's less than significant impacts.

b) Alternative 2: New Parking Garage Alternative

The purpose of the New Parking Garage Alternative (Alternative 2) is to reduce the Project's excavation volumes and, thus, reduce the Project's significant and unavoidable construction-related noise impacts associated with grading. To achieve the reduction in grading, Alternative 2 would eliminate the Project's proposed parking garage expansion and would locate all parking in an enclosed parking structure within the North Plaza. Alternative 2 would include the same amount of overall development (same 2.2:1 FAR,

same number of hotel rooms, same maximum building heights, and same overall floor area) as the Project. However, Alternative 2 would include 360 parking spaces, a reduction of 22 percent from the Project's 464 spaces. Nonetheless, the provided parking spaces for Alternative 2 would meet the City's parking requirements under LAMC Section 12.21 A.4. Alternative 2 would only remove parking spaces and excavation materials associated with the parking garage expansion. The hotel, restaurant, pool, landscaping, and other amenity areas would remain the same as under the Project, apart from a minor reduction (125 square feet) in the amount of landscaping needed. The requested actions for Alternative 1 would be the same as under the Project.

As discussed in subsection 6.b)(3) in Chapter V, *Alternatives*, of this Draft EIR, Alternative 2 would not avoid the Project's significant and unavoidable impacts associated with on-site construction noise. Alternative 2 would also not avoid the Project's significant cumulative impacts that cannot be feasibly mitigated with regard to on-site construction noise and off-site construction noise – mobile sources. All other environmental impacts would be less than or similar to the Project.

c) Alternative 3: Office Use Alternative

The Office Use Alternative (Alternative 3) would include a smaller amount of overall development (1.6:1 FAR) as compared to the Project's development (2.2:1 FAR), and consist of office uses in an 8-story office building in place of the Hotel Expansion Building included under the Project, and would not include the Meeting Room Addition. The overall new floor area would be 105,000 square feet, which is approximately 35 percent of the Project's floor area (299,088 square feet). Under Alternative 3, the office building would be constructed on the south side of the Project Site and would not require the removal of the Existing Outdoor Pool Area. Alternative 3 would not require the excavation associated with expansion of the existing parking garage and all new parking would be surface level. Excavation under Alternative 3 would be reduced by approximately 80 percent from 87,000 CY of cut for export under the Project to 17,800 CY of cut for export under Alternative 3. Parking under Alternative 3 would be reduced relative to the parking requirements for the office use area. New parking on the Project Site to be provided along the existing circulation roads and within the North and South Plazas would be reduced by 54 percent from 464 new spaces under the Project to 215 spaces under Alternative 3, and would be consistent with the City's LAMC parking requirements. Alternative 3's proposed office uses would also not be an allowed use in the southern portion of the Project Site's existing zoning of RE15-1-H. Therefore, Alternative 3 would require the same zone change as the Project to allow for a uniform C2 zone for the entire Project Site.

As discussed in subsection 6.c)(3) in Chapter V, *Alternatives*, of this Draft EIR, Alternative 3 would not avoid the Project's significant and unavoidable impacts associated with on-site construction noise. Alternative 3 would also not avoid the Project's significant cumulative impacts that cannot be feasibly mitigated with regard to on-site construction noise. All other environmental impacts would be less than or similar to the Project.

d) Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a proposed project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR and that if the “no project” alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives. With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible Alternatives includes the No Project/No Build Alternative, New Parking Garage Alternative, and Office Use Alternative.

A comparative summary of the environmental impacts anticipated under each Alternative to the environmental impacts associated with the Project is provided in **Table V-2, Comparison of Impacts Associated with the Alternatives and the Project**, in Chapter V, Alternatives, of this Draft EIR. As indicated in Table V-2, the No Project/No Build Alternative would have less impacts than the Project or other alternatives as it would have no direct or indirect impacts on the environment. Further, it would avoid the Project’s short-term construction impacts on air quality, noise and traffic, including the Project’s significant and unavoidable construction noise impacts. Therefore, the No Project/No Build Alternative is considered the overall Environmentally Superior Alternative.

However, although Alternative 1 would avoid all the Project’s significant environmental impacts relating to on-site construction noise, it would also not include the Project’s beneficial impacts or meet any of the Project Objectives. As shown in **Table V-3, Ability of Alternatives to Meet Project Objectives**, the No Project/No Build Alternative would not allow for the underlying purpose of the Project to expand and upgrade the existing Hilton Universal City Hotel to maintain its competitive position as a hub for regional commerce with convenient visitor access to Universal Studios Hollywood, Universal CityWalk, and other proximate tourist and entertainment destinations. The Project Site would remain available for an alternative future development that may or may not have less environmental impact than the Project.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project/No Action Alternative, a comparative evaluation of the remaining Alternatives should be performed. Following this guideline, Alternative 3, Office Use Alternative, has been identified as an Environmentally Superior Alternative to the remaining alternatives as it requires the least amount of excavation and grading and would have 65 percent less Floor Area than the Project or Alternative 2.

Alternative 2, which fully meets many of the Project Objectives, would be considered environmentally superior to the Project because Alternative 2 would slightly reduce the construction-based impacts, due to the reduction in grading, excavation, and foundation work associated with the parking garage expansion. However, as Alternative 2 would result in the same FAR and uses as the Project, Alternative 3 is only Alternative that substantially reduces the scale of development. The amount of excavation, building

volume and related construction activity under Alternative 3 would be less than that required for Alternative 2, 55 percent less than the project associated with Alternative 2 and 80 percent less than the Project. Therefore, Alternative 3 offers the greatest reduction in construction activity and construction impacts including those associated with on- and off-site construction noise.

As shown in Table V-2, Alternative 3 would broadly reduce the Project's environmental impacts, with a higher number of issue areas than Alternative 2 resulting in less impacts compared to the Project. Alternative 3 would substantially reduce the scale of development by reducing the Project's floor area by approximately 65 percent and would substantially reduce the duration of construction activities and the Project's significant and unavoidable construction noise impacts. However, as with Alternative 2, significant noise impacts would not be reduced to less than significant levels. As also shown in Table V-3, Alternative 3 would fully meet three of the Project's six specific Objectives and would not meet the Project's underlying purpose to maintain its competitive position as a hub for regional commerce with convenient visitor access to Universal Studios Hollywood, Universal CityWalk, and other proximate tourist and entertainment destinations.

It should also be noted that Alternative 3 would require the least amount of electricity and water consumption due to the lack of new pool areas, lack of a new spa area, and lack of new restaurant areas. It would also require less overall change to the current setting conditions than other alternatives as the Existing Outdoor Pool Area would remain. However, Alternative 3 would lack the potential benefits as the Project since it would not provide the same type of visitor serving uses that would enable visitors to use alternative modes of transportation while visiting a regional hub for commerce including tourist destinations, entertainment-related uses and transit centers. Further, Alternative 3 would not support many of the Project Objectives. Therefore, Alternative 3 would only partially meet the Project's economic and development Objectives by providing new local employment opportunities.

Therefore, while Alternative 3 is environmentally superior to the remaining alternative it would not necessarily be considered superior to the Project and would not meet the Project's attainment of its Project Objectives.