VI. Other CEQA Considerations

1. Significant Unavoidable Impacts

Section 15126.2(a) of the CEQA Guidelines requires that an EIR describe significant environmental impacts of a project on the environment. Direct and indirect significant effects shall be clearly identified and described, giving due consideration to short-term and long-term effects. As evaluated 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 (R1). Construction noise impacts would be less than significant for receptor R2 without implementation of a noise barrier due to the receptor's distance from the Project Site and difference in elevation. Receptors 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 Receptors 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 receptors R1 (Sheraton Hotel levels 6 through 17) through R5. The noise barriers required under Mitigation Measure NOI-MM-1 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 (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 two levels of receptor location R1. Construction noise levels at R2 are less than significant without mitigation, and Receptors 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 receptors 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 projects 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); 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.

2. Reasons Why the Project is Being Proposed, Notwithstanding Significant Unavoidable Impacts

In addition to identification of the Project's significant unavoidable construction-related noise impacts, Section 15126.2(c) of the CEQA Guidelines also requires a description of the reasons why a project is being proposed, notwithstanding significant unavoidable impacts associated with the project. The reasons why the Project has been proposed are grounded in the Project's underlying purposes and the associated list of project objectives included in Chapter II, *Project Description*, of this Draft EIR.

As provided in Chapter II, *Project Description*, of this Draft EIR, the underlying purpose of the Project is 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. This underlying purpose and associated objectives are closely tied to and would be consistent with the Southern California Association of Governments (SCAG) Regional Council adopted 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS); the City of Los Angeles General Plan Framework Element (Framework Element); and the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan. A summary of the Project's consistency with each of these plans is provided below.

a) 2020–2045 RTP/SCS

The Project would be consistent with 2020–2045 RTP/SCS strategies to emphasize land use patterns that facilitate multi-modal access to work, educational and other institutions. Because of the proximity to transit, the Project would also be consistent with strategies that plan for growth near transit investments and support implementation of first/last mile strategies by utilizing a safe pedestrian route between the Project Site and the transit station. The Project would be consistent with strategies to prioritize infill and redevelopment of underutilized land to accommodate new growth and to increase amenities and connectivity in existing neighborhoods, and because the Project would represent an infill development and intensification of an existing developed site within a Transit Priority Area (TPA)/High Quality Transit Area (HQTA), the Project would increase pedestrian activity and connectivity in the existing area. The Project would also be supportive of 2020–2045 RTP/SCS strategies that encourage design and transportation options that reduce the reliance on and number of solo car trips, as it would intensify development in a TPA/HQTA and would provide bicycle parking spaces and bicycle amenities, which would encourage employee cycling to work and the use of bicycles by guests for sight-seeing and other regional trips, thus, reducing the reliance on and number of solo car trips. The Project would be consistent with strategies that support development of local climate adaptation and hazard mitigation plans, as well as improve community resiliency to climate change and natural hazards because due to the location of the Project within the TPA/HQTA, the Project would contribute to the reduction in vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions.

In addition, the Project would protect water resources by incorporating a variety of water conservation features pertaining to water-efficient fixtures for the entire Project; landscaping and irrigation features, such as use of artificial turf, California Friendly® plants, and drip/subsurface irrigation (micro-Irrigation); and pool-related features, such as a leak-detection system and water-saving pool filters. Further, the Project would support local policies for renewable energy and green building design, as it would be designed to meet the California Green Building Standards (CALGreen) Code as adopted, or the Los Angeles Green Building Code, which was amended to incorporate various provisions of the CALGreen Code, through the incorporation of green building techniques and other sustainability features, including 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; and the provision of bicycle parking and other amenities for bicyclists, and electric vehicle charging stations.

The Project would also be consistent with the 2020–2045 RTP/SCS strategies that promote more resource-efficient development focused on conservation, recycling and reclamation by including design features that would contribute to energy efficiencies. Recycling would include a program for all disposable products from rooms including soap, shampoo, kitchen glass and plastic. Conservation efforts would include water efficient

plumbing fixtures and low-flow shower heads, leak detection system and water-saving pool filters for the swimming pool, artificial turf, a drip/subsurface Irrigation (Micro-Irrigation) system, and retention of surface water runoff in accordance with LID requirements.

b) General Plan Framework Element

The Project would intensify commercial uses in a designated Regional Center served by public transit. The Project's improvements would be compatible with the entertainment and commercial environment in the Universal City area. The Project would also be consistent with Framework Element's goals to achieve a balanced and diverse distribution of land uses that contributes to the City's long-term fiscal and economic viability by continuing and expanding the existing hotel use and maximizing the use of the Project Site by accommodating a higher density at the Project Site. The Project is located in a TPA and near the Metro B Line (Red Line) Universal City/Studio City Station, reducing the need for vehicle use and reducing traffic congestion. The proximity of the Project to transit would be consistent with Framework Element policies to promote an improved quality of life by facilitating a reduction of vehicle trips, VMT, and air pollution. The Project would be supportive of the Urban Form and Neighborhood Design objective to reinforce existing Regional Centers that accommodate a broad range of users that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles. The Project would also be consistent with Framework Element's objectives to encourage proper design and effective use of the built environment to help increase personal safety at all times of the day by continuing the existing comprehensive security program, 24 hours per day/seven days per week, to ensure the safety of hotel guests and visitors.

c) Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan (Community Plan)

The Project Site is consistent with Community Plan's Regional Center Commercial (Pre-Framework) designation. The Project would be consistent with the goals of the Community Plan to conserve and strengthen the Community's commercial sector, to enhance the visual character of the Project Site, and to provide on-site landscaping. In addition, by maintaining existing security personnel and providing well-lit public and semi-public spaces, as well as active security features, the Project would support the Community Plan's goals with respect to police and fire services. The Project would represent the expansion of an existing hotel that would increase density and human activity within a designated TPA and within a 0.25 mile, and easy pedestrian access, of the Metro B Line (Red Line) Universal City/Studio City Station. As such, the Project would be consistent with the transportation goals of the Community Plan to increase use of public transit for work trips and non-work trips and to encourage alternative modes of transportation to the use of single occupancy vehicles in order to reduce trips.

As described further below, this Project is being proposed, notwithstanding its significant and unavoidable impacts, because: (1) the Project would support a considerable number of regional and community land use and mobility objectives, including those that promote infill development within a TPA in accordance with 2020–2045 RTP/SCS, General Plan, and Community Plan strategies, policies, and objectives; (2) the Project would provide employment and visitor-serving uses to the local area and the region; and (3) the Project would provide economic benefits to the region.

More specifically, the Project includes a number of characteristics that are consistent with, and contribute to, the implementation of local, regional, and State land use and mobility objectives. The Project's location (within a Priority Growth Area (PGA) and considered both a TPA and a HQTA due to its location within 0.25 miles of the Metro B Line (Red Line) Universal City/Studio City Station) would help facilitate a reduction in per capita employee VMT and air pollution by maximizing infill development within an existing TPA and HQTA. The Project would provide pedestrian connectivity throughout the Project Site and to nearby entertainment and tourist destinations and transit centers, consistent with applicable strategies, policies, and objectives of the 2020–2045 RTP/SCS, the General Plan Framework Element, and the Community Plan. The Project would also provide new hotel and restaurant uses located within walking and biking distances to transit and bus routes, including bus lines operated by Metro, BurbankBus Lines, and Universal Studios. In addition to the bus lines, the Metro B Line (Red Line) Universal City/Studio City Station acts as a transfer hub for these local bus lines and is located within 0.25 miles of the Project Site.

The Project would be consistent with the requirements of the Los Angeles Green Building Code and the CALGreen Code and would be designed to United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Gold certification or equivalent standards through proven and effective design strategies. The Project would also implement a transportation demand management (TDM) program to reduce single occupant vehicle trips. The TDM program would include design features, transportation services, education, and incentives intended to reduce the number of single-occupant vehicles during commuter peak hours. The Project would comply with the City's Electric Vehicle Parking Ordinance, which requires 30 percent of the Project's total parking spaces to be designated as electric vehicle (EV) spaces capable of supporting future EV supply equipment, and 10 percent of the total number of spaces to be EV charging stations (Ordinance No. 186,485). Further, the Project would provide on-site short and long-term bicycle parking. The Project would incorporate water conservation and rainwater management strategies such as low flow/efficient water fixtures, rainwater capture systems, drought-tolerant/California native plant species selection, landscape contouring to minimize precipitation runoff, irrigation system efficiency, smart irrigation systems (e.g., weather-based controls), and water-saving pool equipment.

The Project would support the growth of the City's economic base by creating jobs during both Project construction and operation of the Project. The Project would also create commercial opportunities that could serve local employees, generate local tax revenues, and provide new permanent jobs. Furthermore, as discussed in Chapter V, *Alternatives*, of this Draft EIR, neither of the Project's "build" alternatives (Alternatives 2 and 3) would reduce the Project's significant and unavoidable impacts to a level less than significant, and although the No Project/No Build Alternative would result in the elimination of all of the Project's significant and unavoidable impacts, it would not achieve any the stated Project objectives or underlying purpose.

For all the reasons stated above, the Project is being proposed notwithstanding its significant unavoidable construction noise impact. It should also be noted that the Project's significant and unavoidable noise impact, is associated with temporary and periodic construction activities, similar to those occurring at other development sites in urban areas, particularly within infill locations.

3. Significant Irreversible Environmental Changes

According to Section 15126.2(d) of the CEQA Guidelines, an EIR is required to address any significant irreversible environmental changes that would occur should the proposed Project be implemented. As stated in CEQA Guidelines Section 15126.2(d):

> *Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter likely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the Project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

The Project would necessarily consume limited, slowly renewable and non-renewable resources that could result in irreversible environmental changes. This consumption would occur during the construction phase of the Project and would continue throughout its operational lifetime. Project development would require a commitment of resources that would include: (1) building materials and associated solid waste disposal effects on landfills; (2) water; and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation.

a) Building Materials and Solid Waste

Project construction would require the consumption of resources that are non-replenishable or may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: certain types of lumber and

other forest products; aggregate materials used in concrete and asphalt such as sand, gravel and stone; metals such as steel, copper, and lead; petrochemical construction materials such as plastics; and water. Furthermore, nonrenewable fossil fuels such as gasoline and oil would also be consumed in the use of construction vehicles and equipment, as well as the transportation of goods and people to and from the Project Site.

As discussed in the Project's *Initial Study – Section XIX (d)* (contained in *Appendix A-1* of this Draft EIR), Project construction would generate an estimated 2,107 tons of construction and demolition (C&D) waste. This estimate does 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 Assembly Bill (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. 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 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.

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.

b) Water

Consumption of water during construction and operation of the Project is addressed in Section IV.M.1, *Utilities and Service Systems-Water Supply*, of this Draft EIR. As discussed therein, Project construction would result in an intermittent demand for water during demolition, excavation, grading, and construction activities on-site, including but not limited to use in dust control, cleaning of equipment, excavation/export, removal and re-compaction, and other related activities. Based on a review of construction projects of similar size and duration, a conservative estimate of construction water use ranges from 1,000 to 2,000 gallons per day (gpd) for the Project. Using the upper range of 2,000 gpd to provide a more conservative analysis, construction water use would be substantially less than the Project's approved water consumption during long-term operation (estimated to be approximately 112,868 gpd for the Project according to the approved Water Supply Assessment [WSA]). Considering temporary construction water use would be substantially less than the approved water consumption at the Project Site, there would be sufficient water supplies available to serve the Project Site during construction.

Furthermore, Project construction includes demolition of the Existing Outdoor Pool Area which would also reduce existing water demand on the Project Site.

With regard to long-term operations, the City's Department of Water and Power (LADWP) determined in the Project's approved WSA that there are adequate water supplies available from existing LADWP entitlements and supplies to meet the projected water demand of 112,868 gpd, when considering the existing and planned future demand on LADWP, annually during normal, single-dry, and multiple-dry water years over the next 20 years, as required by SB 610, as well as through at least 2040 (the planning horizon of the LADWP's 2015 Urban Water Management Plan (UWMP)). In addition, as stated in the Project's approved WSA, the projected water demand falls within the LADWP's 2015 UWMP's projected increases in Citywide water demands, while anticipating multi-dry year water conditions during the planning period. The Project, as described in Chapter II, *Project Description*, of this Draft EIR, would result in a proposed water demand increase of 77,619 gpd. As this water demand is less than the demand projected in the Project's approved WSA, the conclusion that there is adequate water supplies available from existing entitlements to the meet the demand through 2040 remains applicable.

Thus, as evaluated in Section IV.M.1, *Utilities and Service Systems-Water Supply*, of this Draft EIR, while Project construction and operation would result in some irreversible consumption of water, the Project would not result in a significant impact related to water supply.

c) Energy Consumption

Project operation would continue to expend nonrenewable resources that are currently consumed within the City. These include energy resources such as electricity and natural gas, petroleum-based fuels required for vehicle-trips, fossil fuels, and water. Fossil fuels would represent the primary energy source associated with both construction and ongoing operation of the Project, and the existing, finite supplies of these natural resources would be incrementally reduced.

At the same time, the Project's infill of an existing hotel property located within a TPA and HQTA would contribute to a land use pattern that would reduce reliance on private automobiles and the consumption of non-renewable resources when considered in a larger context. Most notably, the Project would provide expanded visitor-services and employment in close proximity to tourist destinations, entertainment-related uses, and transit centers. As described above, the Project Site is located within a HQTA, and therefore is preferred for development pursuant to the 2020–2045 RTP/SCS and City policies to reduce vehicle miles traveled and related consumption of renewable resources, among other goals. Given its location, the Project would support pedestrian and bicycle access to a considerable range of employment, retail and entertainment activities. The Project also provides excellent access to the regional transportation system as it is located in proximity to the Metro B Line (Red Line) station and numerous regional

and local Metro bus lines. These factors would contribute to a land use pattern that is considered to reduce the consumption of non-renewable resources.

Furthermore, the Project would include design features such as GHG-PDF-1 (Green Building Features), which requires that the Project's buildings be designed to achieve the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Gold Certification or equivalent and that they 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. In addition, Project Design Feature WS-PDF-1 (Water Conservation Features) includes water conservation features that reduce energy consumption and associated operational GHG emissions, while Project Design Feature TRAF-PDF-1 (TDM Program) would require implementation of a TDM Program to reduce Project VMT that reduce operational energy demand and related GHG emissions. The Project would comply with the Los Angeles Sustainable City pLAn 2019, Los Angeles Green Building Code, the CALGreen Code, the State's AB 32 GHG reduction target, and other sustainability plans. Emissions generated by the Project's construction and operation activities would be consistent with standards set forth in the 2020–2045 RTP/SCS to meet GHG emission-reduction targets set by the California Air Resources Board. The Project would also be consistent with regional employee growth provided in the 2020–2045 RTP/SCS.

The Project would reduce GHGs by achieving the equivalent of the USGBC LEED Gold certification level (refer to Project Design Feature WS-PDF-1). Additional project design features that would contribute to energy efficiencies and to reduce GHG emissions include, but are not limited to: the use of materials and finishes that emit low quantities of volatile organic compounds; the installation of heating, ventilation, and air conditioning systems that use ozone-friendly refrigerants; the installation of heat pumps; the installation of high-efficiency appliances; and the provision of bicycle parking and other amenities for bicyclists. The 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. In addition, the Project would incorporate a variety of water conservation features pertaining to water-efficient fixtures, such as High Efficiency Toilets with a flush volume of 1.0 gallons per flush, or less; waterless urinals; High-efficiency Energy Star–rated commercial dishwashers, etc. which comply with the performance requirements specified in the City of Los Angeles Green Building Code (Ordinance No. 184,692). For the Project landscaping and irrigation, features such as use of artificial turf, California Friendly® plants, and drip/subsurface irrigation (micro-Irrigation); and pool-related features, such as a leak-detection system and water-saving pool filters would be incorporated. The Project's water conservation features are included as Project Design Feature WS-PDF-1, as noted above.

As indicated in Section IV.F, *Greenhouse Gas Emissions*, of this Draft EIR, the Project would result in a less than significant GHG impact with these project design features and other Project components. In addition, as described in Sections IV.A, *Air Quality*, IV.D, *Energy*, IV.H, *Land Use and Planning*, and IV.K, *Transportation*, of this Draft EIR, the Project would be consistent with applicable plans, policies, or regulations to reduce GHG emissions and energy demand, such as those within the 2020–2045 RTP/SCS, the Framework Element, and the Community Plan.

As discussed above, continued use of non-renewable resources would be on a relatively small scale when considered with regard to the existing supplies of these natural resources, and their use would be consistent with regional and local growth forecasts in the area, as well as State and local goals for reductions in the consumption of such resources. Furthermore, the Project would not affect access to existing resources, nor interfere with the production or delivery of such resources. The Project Site contains no energy resources that would be precluded from future use through Project implementation. The Project's irreversible changes to the environment related to the consumption of nonrenewable resources would not be significant.

4. Growth-Inducing Impacts

a) Population

Section 15126.2(e) of the CEQA Guidelines requires an EIR to discuss the ways a proposed project could foster economic or population growth or the construction of additional housing, directly or indirectly, in the surrounding environment. Growth-inducing impacts include the removal of obstacles to population growth (e.g., the expansion of a wastewater treatment plant allowing more development in a service area) and the development and construction of new service facilities that could significantly affect the environment individually or cumulatively. In addition, pursuant to CEQA, growth must not be assumed as beneficial, detrimental, or of little significance to the environment.

The Project would expand the development on an existing hotel property, identified as an infill site, with a new Hotel Expansion Building, a Meeting Room Addition, an expanded parking structure, and additional landscaping, utility, and circulation improvements. The new development would be located within the area identified in the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan as Regional Center Commercial. Regional Centers are defined 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. The Project, which has a floor-to-area ratio of greater than 0.75 and is located on an infill site, also qualifies as an employment center project. The Project would include visitor-serving uses that would be compatible with adjacent uses and representative of the type of development anticipated for the Project Site in the Community Plan. As further described in Section IV.H, *Land Use and Planning*,

of this Draft EIR, the Project would be consistent with the existing zoning designation of C2-1, with the approval of the proposed vesting zone change for portions of the property from PB and RE15 to allow for uniform zoning, and the approval of a height district change for the Project Site from Height District 1 to Height District 2.

As described in the Initial Study contained in Appendix A-1 of this Draft EIR, 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. Indirect population growth that might occur as a result of employment opportunities from Project implementation would represent an extremely small component (less than one percent) of the projected population growth projected for the City. The Project's new development is within the range of development anticipated within the established SCAG regional forecast for the City of Los Angeles and Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan area. Therefore, the Project would not increase or induce residential density growth.

Construction workers would not be expected to relocate their households' places of residence as a direct consequence of working on the Project. The work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the specific time during which their skills are needed to complete a particular phase of construction. Therefore, given the availability of construction workers, the Project would not be considered growth-inducing from a short-term employment perspective, but rather, the Project would provide a public benefit by providing new employment opportunities during the construction period.

The Project Site is located in an urbanized area that is served by current infrastructure (e.g., roads and utilities) and community service facilities. The Project's only off-site infrastructure improvements would consist of tie-ins to the existing utility main-lines already serving the Project area. The Project would not require the construction of off-site infrastructure that would provide additional infrastructure capacity for other future development. It would not open inaccessible sites to new development other than existing opportunities for development that are already available.

Overall, the Project would be consistent with the growth forecast for the SCAG region and City of Los Angeles, and would be consistent with regional policies to reduce urban spawl, efficiently utilize existing infrastructure, reduce regional congestion, as well as improve air quality though the reduction of VMT with the Project's proximity to public transit options.

Therefore, the Project would not spur additional growth other than that already anticipated and would not eliminate impediments to growth. Consequently, the Project would not foster growth inducing impacts.

b) Employment

The Project would have the potential to generate indirect population growth in the vicinity of the Project Site as a result of the employment opportunities generated by the Project. During construction, the Project would create temporary construction-related jobs. However, as discussed above in the Population sub-section, construction workers remain at a job site only for the specific time in which their skills are needed to complete a particular phase of the construction process. Thus, construction workers would not be expected to relocate to the Project Site vicinity as a direct consequence of working on the Project. Therefore, given the availability of construction workers, the Project would not be growth-inducing from a short-term employment perspective, but rather, the Project would provide a public benefit by providing new employment opportunities during the construction period.

Currently, for operation of the Existing Hotel Building and Existing Ancillary Hotel Building, Universal Hilton employs approximately 370 full-time staff members and 90 part-time and seasonal employees, which equates to 415 full-time equivalent (FTE) employees. The Project would result in a similar ratio of full-time to part-time/seasonal employees as under existing conditions. The Project is anticipated to result in approximately 321 FTE employees at the Hotel Expansion Building, including 257 full-time employees and 128 seasonal/part-time employees.[1] When combined with the Existing Hotel Building and Existing Ancillary Hotel Building's approximately 415 FTE employees, Universal Hilton would employ a total of approximately 736 FTE employees on the Project Site. Overall, the provision of new jobs would constitute a small percentage of employment growth forecasted by SCAG for the City and would not produce such a high quantity of new jobs that it would have the possibility to induce unplanned residential growth.

The Project's proposed hotel and supporting back-office uses would include a range of full-time and part-time positions that are typically filled by persons already residing in the vicinity of the workplace, and who do not relocate their households due to employment opportunities. Therefore, given that some of the employment opportunities generated by the Project would be filled by persons already residing in the vicinity of the Project Site, the potential growth associated with Project employees who may relocate their place of residence would not be substantial. Although it is possible that some of the employment opportunities offered by the Project would be filled by persons moving into the surrounding area, which could increase the demand for housing, it is anticipated that most of this demand would be filled by then-existing vacancies in the housing market and others by residential developments that may occur in the vicinity of the Project Site. As

[1] Full-time employees anticipated for the Project are generated using the Los Angeles Unified School District 2022 Developer Fee Justification Study, which utilizes 0.00113 employees per average square foot for the category of "Lodging" that applies to the Project. FTE employee numbers are calculated with two part-time/seasonal employees as one FTE employee.

such the Project's uses would be unlikely to create an indirect demand for additional housing or households in the area.

5. Potential Secondary Effects of Mitigation Measures

Section 15126.4(a)(1)(D) of the CEQA Guidelines requires mitigation measures to be discussed in less detail than the significant effects of the proposed Project if the mitigation measure(s) would cause one or more significant effects in addition to those that would be caused by the Project as proposed. The analysis of Project impacts in Chapter IV, *Environmental Impact Analysis,* of this Draft EIR resulted in recommended mitigation measures for several environmental topics, which are identified below. The following provides a discussion of the potential secondary effects on those topics that could occur as a result of implementation of the required mitigation measures. For the reasons stated below, it is concluded that the Project's mitigation measures would not result in significant secondary impacts.

a) Air Quality

Mitigation measure AQ-MM-1 requires the use of off-road diesel-powered construction equipment during Project construction that meets or exceeds the USEPA Tier 4 standards, or equivalent for equipment rated at 50 horsepower or greater during Project construction where available within the Los Angeles region, and to maintain applicable equipment to such standards. Mitigation Measure AQ-MM-1 also requires that construction activities shall be discontinued during second-stage smog alerts. These requirements would reduce construction air emissions to a level of less than significant. Because this mitigation measure would apply only to construction activities used within and immediately adjacent to the Project Site, implementation of this mitigation measure would not result in secondary environmental effects at neighboring properties or within the broader community.

b) Biological Resources

Mitigation Measure BIO-MM-1 requires the protection of sensitive bat species. This mitigation measure would reduce impacts on species to a less than significant level by requiring pre-construction surveys for construction activities occurring during the maternity roosting season and avoidance of identified active roosts. Because these requirements would apply only to potential roosting habitat within the Project Site or within the right-of-way immediately adjacent to the Project Site, the implementation of this mitigation measure would not result in secondary environmental effects at neighboring properties or within the broader community.

c) Geology and Soils

Mitigation Measures PALEO-MM-1 to PALEO-MM-3 would ensure short-term construction activities do not directly or indirectly destroy a unique paleontological resource or site. These mitigation measures require the retention of a qualified paleontologist to provide technical and compliance oversight during construction, construction worker training, and paleontological resource monitoring during all ground disturbance activities. With implementation of Mitigation Measures PALEO-MM-1 to PALEO-MM-3, potentially significant impacts to paleontological resources would be reduced to a less-than-significant level. Because these requirements would apply only to ground disturbance occurring within the Project Site, the implementation of this mitigation measure would not result in secondary environmental effects at neighboring properties or within the broader community.

d) Noise

Mitigation Measure NOI-MM-1 provides procedures to be followed during Project construction to avoid noise impacts at sensitive receptors. As such, the mitigation measure would reduce adverse environmental effects. The only construction activity associated with the mitigation measure is the construction of a temporary twenty-foot noise barrier along the western boundary of the Hilton Property with noise blankets or equivalent noise reduction materials capable of reducing sound levels by at least 15 dBA at the nearest off-site sensitive receptors, during early construction phases through completion of architectural coating activities. Construction of this barrier represents a very minor temporary site improvement, from which noise and vibration would negligible, and is part of the anticipated construction program addressed in the environmental analyses in Section IV.I, *Noise,* of this Draft EIR. Therefore, no secondary impacts would result.

Mitigation Measure NOI-MM-2 sets forth procedures to be followed during Project construction to ensure construction equipment is maintained with noise shielding and muffling devices, consistent with the manufacturer's specifications. Documentation of this compliance would not require infrastructure or additional equipment and, therefore, would not result in secondary environmental impacts.

6. Effects Found Not to be Significant

Section 15128 of the CEQA Guidelines states that an EIR shall contain a brief statement indicating reasons that various possible significant 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 is included in Appendix A-2 of this Draft EIR. Pursuant to Section 15128, such a statement may be contained in an attached copy of an Initial Study.

The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each topical area is or is not analyzed further in the Draft EIR.

The Initial Study determined that the Project would not result in potentially 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.