

V. Alternatives

1. Introduction

Under California Environmental Quality Act (CEQA), and as indicated in California Public Resources Code (PRC) Section 21002.1(a), the identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process and is required to ensure the consideration of ways to mitigate or avoid the significant environmental effects of a project. Specifically, PRC Section 21001 states, in part, that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives which will avoid or substantially lessen such significant effects.

Guidance regarding the definition of project alternatives is provided in the CEQA Guidelines Section 15126.6(a) as follows:

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible.

The CEQA Guidelines emphasize that the selection of project alternatives be based primarily on the ability to reduce significant impacts relative to the project, “even if these alternatives would impede to some degree the attainment of the Project Objectives, or would be more costly.”¹ The CEQA Guidelines further direct that the range of alternatives be guided by a “rule of reason,” such that only those alternatives necessary to permit a reasoned choice are analyzed.²

In selecting project alternatives for analysis, potential alternatives should be feasible. The CEQA Guidelines Section 15126.6(f)(1) explains that:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent

¹ CEQA Guidelines Section 15126.6(b).

² CEQA Guidelines Section 15126.6(f).

can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).

The CEQA Guidelines require the analysis of a “no Project” alternative and, depending on the circumstances, evaluation of alternative location(s) for the Project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. In general, the environmentally superior alternative is the alternative with the least adverse impacts on the environment. If the environmentally superior alternative is the “no Project” alternative, the EIR shall also identify another environmentally superior alternative among the other alternatives.³

Section 15126.6(d) of the CEQA Guidelines states that alternatives analysis need not be presented to the same level of detail as the assessment of the Project. Rather, the EIR is required to provide sufficient information to allow meaningful evaluation, analysis and comparison with the Project. If an alternative would cause one or more significant impacts in addition to those of the Project, analysis of those impacts is to be discussed, but in less detail than for the Project.

2. Overview of Selected Alternatives

As stated above, according to the CEQA Guidelines Section 15126.6(a), the intent of the alternatives analysis is to determine if there are feasible alternatives that would avoid or substantially reduce the significant impacts of a project. Based on the analysis in Chapter IV, *Environmental Impact Analysis*, of this Draft EIR, implementation of the Project would result in significant construction impacts that cannot be feasibly mitigated with regard to on-site construction noise (Project-level and cumulative impacts under Noise Threshold (a) and off-site construction traffic noise (cumulative impacts under Noise Threshold (a)). With implementation of Mitigation Measure AQ-MM-1, short-term construction NO_x emissions would be reduced to below the regional emission significance threshold for NO_x. With implementation of Mitigation Measure BIO-MM-1, potentially significant impacts on special-status wildlife species (roosting bats) would be reduced to a less-than-significant level. 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. The Project would not result in any significant operational impacts. Implementation of the Project would also result in significant cumulative impacts that cannot be feasibly mitigated with regard to construction noise associated with off-site construction truck traffic and cumulative noise impacts on the Sheraton Hotel. With implementation of Mitigation Measure AQ-MM-1, cumulative construction impacts for regional construction emissions would be less than significant with mitigation; with implementation of the City’s standard condition of approval, or mitigation measures, if required for related projects, cumulative impacts on archaeological resources associated with related projects and the Project would be less-than-significant. Cumulative impacts

³ CEQA Guidelines Section 15126.6(e)(2).

related to paleontological resources would be less than significant with implementation of Mitigation Measures PALEO-MM-1 to PALEO-MM-3.

The following alternatives to the Project have been selected to inform evaluation of the Project in light of the significant environmental impacts of the Project, the objectives established for the Project (listed above) and the feasibility of the alternatives considered.

- **Alternative 1 – No Project/No Build Alternative:** In accordance with CEQA Guidelines Section 15126.6(e), the No Project/No Build Alternative for a development project on an identifiable property would be 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 purposes of this analysis, the No Project/No Build Alternative (Alternative 1) assumes that the Existing Hotel Building would continue in operation at the Project Site as under existing conditions and the Project would not be developed.
- **Alternative 2 – New Parking Garage Alternative:** The purpose of Alternative 2 is to reduce the Project’s excavation volumes and, thus, reduce the Project’s significant and unavoidable construction-related noise and vibration impacts associated with excavation, grading, and foundation work for the parking garage expansion. As with the Project, Alternative 2 would require the reconfiguration of the existing circulation and North and South Plazas. However, the existing parking garage would be maintained as is. Alternative 2 would eliminate the Project’s expansion of the existing parking garage; reduce the Project’s 464 new parking spaces to 360 new spaces, a reduction of approximately 22 percent; and locate all of the new parking in a new three-story parking garage structure over the North Plaza. The total soil export would be reduced from 87,000 cubic yards (CY) to 39,300 CY. Alternative 2 would provide the same square footage and building heights for the Hotel Expansion Building and Meeting Room Addition and LAMC calculated floor area (299,088 square feet) as the Project. The configuration of the circulation for guest arrival would be similar to the Project. As with the Project, Alternative 2 would provide the same restaurant, spa, lounge, and pool uses (indoor and outdoor spaces). The new parking garage structure would reduce the proposed landscaping.
- **Alternative 3 – Office Use Alternative:** Alternative 3 would retain the Project Site’s existing hotel use. The southern portion of the Project Site would not be redeveloped with the Hotel Expansion Building and Meeting Room Addition, and the Existing Outdoor Pool Area would be maintained in its current condition. However, an approximately 105,000-square-foot, 8-story office building would be developed on the southern portion of the Project Site adjacent to the Existing Outdoor Pool Area. Total new floor area under Alternative 3 would be 105,000 square feet. In addition, the existing parking garage would remain the same as under existing conditions, and all new parking for the office building would be surface level. As such, Alternative 3 would reduce the Project’s significant and unavoidable construction noise and vibration impacts by reducing excavation,

grading, and foundation work, which would in turn reduce the overall amount of building construction and shorten the total construction duration. Parking would be reduced from 464 new spaces to 215 new spaces, an approximately 54 percent reduction compared to the Project. Alternative 3 would reduce the Project's 2.2:1 FAR to 1.6:1. Alternative 3 would reduce the Project's total soil export from 87,000 CY to 17,800 CY.

These three Alternatives are summarized and compared to the Project in **Table V-1, Overview of the Project Alternatives**. In Table V-1, the "post-development" totals include the Project combined with the existing on-site hotel facilities. However, only the proposed new development is considered in the evaluation of Project impacts throughout all of Chapter IV, *Environmental Impact Analysis*, of this Draft EIR, and in the evaluation of the Alternatives' impacts below.

**TABLE V-1
OVERVIEW OF THE ANALYZED ALTERNATIVES**

Component	Project	Alternative 1: No Project/ No Build	Alternative 2	Alternative 3
Proposed new building height (stories and feet)	18 stories, 222 ft	0 stories/0 ft	18 stories, 222 ft (Hotel); 3 stories, 38 ft (Parking Garage)	8 stories, 158 ft
Proposed New Hotel Guest Rooms	395 rms	0 rms	395 rms	0 rms
New meeting rooms/spa/dining floor area	28,219 sf	0 sf	28,219 sf	0 sf
New pool area	11,400 sf	0 sf	11,400 sf	0 sf
New Office Floor Area	0 sf	0 sf	0 sf	105,000 sf
Total New Floor Area	299,088 sf	0 sf	299,088 sf	105,000 sf
Project Site FAR	2.2:1	1.3:1	2.2:1	1.6:1
New Landscaping	31,240 sf	0 sf	31,115 sf	33,240 sf
New Parking	464	0 spaces	360	215
Excavated Materials for Export	87,000 CY	0 CY	39,300 CY	17,800 CY

CY = cubic yards, sf = square feet, rms= rooms

SOURCE: ESA, 2023.

3. Alternatives Considered and Rejected as Infeasible

CEQA Guidelines Section 15126.6(c) recommends that an EIR identify alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, the following factors may be used to eliminate alternatives from detailed consideration: the alternative's failure to meet most of the basic Project Objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts, such as the Project's significant and unavoidable construction noise impacts. Alternatives that have been considered and rejected as infeasible are discussed below.

a) Alternative Off-Site Locations

CEQA Guidelines Section 15126.6(f)(2) provides guidance regarding consideration of one or more alternative location(s) for a project, stating that putting the project in another location should be considered if doing so would allow significant effects of the project to be avoided or substantially lessened; and if no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion.

Development of an alternative site would not be consistent with the Project's purpose and objectives and would further be infeasible for a number of additional reasons. The Project's underlying purpose and primary objective is to expand and upgrade the existing Hilton Universal City Hotel to maintain its position as a hub for regional commerce with convenient access to Universal Studios Hollywood, Universal CityWalk, and other proximate tourist entertainment destinations. The Project would implement a number of City and SCAG policies, aimed at infill development within TPAs and increasing employment in proximity to major transit facilities. Further, the Project Site is located adjacent to other existing high-rise hotel buildings and would be compatible with the height and massing of the surrounding area while preserving view corridors to the Hollywood Hills. In addition, the Project Site's proximity to entertainment destinations, providing pedestrian access to Universal Studios Hollywood and similar attractions is key to achieving the Project's main purpose. No equivalent alternative site exists, which renders an alternative project site location infeasible.

Moreover, the Project's construction-related significant and unavoidable noise and vibration impacts are characteristic of infill development in urbanized areas within the Universal City community and elsewhere in the Los Angeles area, particularly those areas identified as transit-oriented districts suitable for high-rise hotels. Additionally, it is possible that development of the Project at an alternative site could potentially be closer to sensitive uses and thus may produce other environmental impacts that would otherwise not occur at the current Project Site or result in greater environmental impacts when compared to the Project. As such, the Project's construction-related significant and unavoidable noise and vibration impacts, including cumulative impacts, would be similar at an alternative site to the Project and would also likely be significant and unavoidable.

The Project Site's location adjacent to the Hollywood Freeway and Universal Studios Hollywood provides for fewer sensitive receptors and greater ambient noise levels than may be expected at alternative sites. Similar impacts would be expected at alternative sites, and alternative sites could have site-specific conditions resulting in still greater impacts on sensitive receptors. Thus, in accordance with CEQA Guidelines Section 15126.6(f), this alternative was rejected from further consideration.

b) Existing Zoning Compliant Alternative

Development of the Project would require a Vesting Zone Change for the portions of the Project Site from PB and RE15 to allow for a uniform C2 zone for the entire Project. Development of an alternative that is compliant with the Project Site's existing zoning would eliminate the need for the Vesting Zone Change. However, the boundaries of the existing C2 zoning on the Project Site that would allow for commercial development, outline the Existing Hotel Building, including the Existing Outdoor Pool Area, the existing North and South Plazas, and the existing circulation on the Project Site. In order to comply with the Project Site's existing zoning, only parking would be permitted to be developed in the PB area and only hillside residential would be permitted to be developed in the RE15 area. Neither additional parking nor residential land uses would meet the Project's purpose or objectives, and there is no room within the existing C2 zone to accommodate infill development. Additionally, it is possible that development of the Project at an alternative zoning compliant site could potentially be closer to sensitive uses and thus may produce other environmental impacts that would otherwise not occur at the current Project Site or result in greater environmental impacts when compared to the Project. As such, the Project's construction-related significant and unavoidable noise and vibration impacts, including cumulative impacts, would be similar at an alternative site to the Project and would also likely be significant and unavoidable. Therefore, in accordance with CEQA Guidelines Section 15126.6(f), an existing zoning compliant alternative was rejected from further consideration.

4. Alternatives Analysis Format

In accordance with State CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the Project Objectives, identified in Chapter II, *Project Description*, of this Draft EIR, would be substantially attained by the alternative. The evaluation of each of the alternatives follows the process described below:

- A description of the alternative.
- The net environmental impacts of the alternative are determined for each environmental issue area analyzed in Chapter IV, *Environmental Impact Analysis*, of this Draft EIR, assuming that the alternative would implement the same project design features and mitigation measures identified in each section within that

chapter. Where appropriate, the evaluation is divided between temporary impacts that would occur during the Project's construction phase, and impacts that would occur during the Project's operational phase.

- Post-mitigation and non-significant environmental impacts of the alternative and the project are compared for each environmental topic area. Where the impact of the alternative would be clearly less than the impact of the Project, the comparative impact is said to be "less." Where the alternative's net impact would clearly be more than the Project, the comparative impact is said to be "greater." Where the impacts of the alternative and Project would be roughly equivalent, the comparative impact is said to be "similar." The evaluation also documents whether compared to the Project an impact would be entirely avoided, whether a significant impact could be reduced to a less than significant level, or whether a significant unavoidable impact would be feasible to mitigate to a less than significant level.
- The comparative analysis of the impacts is followed by a general discussion of the extent to which the underlying purpose and Project Objectives are feasibly and substantially attained by the alternative.

A summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed Alternatives is provided in **Table V-2** on page V-8. Pursuant to CEQA Guidelines Section 15126.6(e)(2) an "Environmentally Superior Alternative" is identified.

TABLE V-2
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Environmental Impact/Phase	Project	Alternative 1: No Project/ No Build	Alternative 2: Surface Parking	Alternative 3: Office Use
Air Quality				
Consistency or Conflict with Air Quality Management Plan				
Construction	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Operation	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Less (Less than Significant)
Cumulative Increase of Criteria Pollutants				
Construction	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Operation	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Less (Less than Significant)
Exposure of Sensitive Receptors to Pollutant Concentrations - Localized Emissions				
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Less (Less than Significant)
Exposure of Sensitive Receptors to Pollutant Concentrations - Carbon Monoxide Hotspots	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Less (Less than Significant)

TABLE V-2
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Environmental Impact/Phase	Project	Alternative 1: No Project/ No Build	Alternative 2: Surface Parking	Alternative 3: Office Use
Exposure of Sensitive Receptors to Pollutant Concentrations - Toxic Air Contaminants				
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Less (Less than Significant)
Biological Resources				
Candidate, Sensitive, or Special-Status Species	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Wildlife Movement and Corridors or Wildlife Nursery Sites	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Conflict with Policies or Ordinances	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Less (Less than Significant)
Cultural Resources				
Historical Resources	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)
Archaeological Resources	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Energy				
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)

TABLE V-2
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Environmental Impact/Phase	Project	Alternative 1: No Project/ No Build	Alternative 2: Surface Parking	Alternative 3: Office Use
Geology and Soils				
Geologic, Seismic, and Soil Hazards	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)
Paleontological Resources	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Greenhouse Gas Emissions				
GHG Emissions/Consistency with Plans	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Hydrology and Water Quality				
Water Quality Standards				
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Greater (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Alteration of Existing Drainage Patterns				
Construction	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)
Conflict with a Water Quality Plan or Sustainable Groundwater Management Plan	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)

TABLE V-2
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Environmental Impact/Phase	Project	Alternative 1: No Project/ No Build	Alternative 2: Surface Parking	Alternative 3: Office Use
Land Use and Planning				
Plan Consistency	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)
Noise				
Noise				
Construction	Significant and Unavoidable with Mitigation	Less (No Impact)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)
Operation	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Less (Less than Significant)
Vibration				
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)
Public Services				
Fire Protection				
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Less (Less than Significant)

TABLE V-2
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Environmental Impact/Phase	Project	Alternative 1: No Project/ No Build	Alternative 2: Surface Parking	Alternative 3: Office Use
Police Protection				
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Less (Less than Significant)
Transportation				
Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)
Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Less (Less than Significant)
Geometric Design Hazards	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Less (Less than Significant)
Tribal Cultural Resources				
Tribal Cultural Resources Impacts	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Utilities and Service Systems				
Water Supply				
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Less (Less than Significant)

TABLE V-2
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Environmental Impact/Phase	Project	Alternative 1: No Project/ No Build	Alternative 2: Surface Parking	Alternative 3: Office Use
Wastewater				
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Less (Less than Significant)

5. Project Objectives

Chapter II, *Project Description*, of this Draft EIR sets forth the Project Objectives defined by the Applicant and the Lead Agency. Section 15124(b) of the CEQA Guidelines states that a project description shall contain “a statement of the objectives sought by the proposed project,” and further states that “the statement of objectives should include the underlying purpose of the project.”

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. The Project’s specific objectives are as follows:

1. Expand hotel capacity and local employment opportunity through infill development on a parcel located within close proximity to tourist destinations, entertainment-related uses, and transit centers, thereby promoting local, regional, and state land use and mobility objectives, enabling visitors to use alternate modes of transportation (e.g., walking, bicycling, transit), and reducing vehicle miles traveled.
2. Maximize the usefulness of the Project Site by redeveloping underutilized portions of the property and upgrading other areas of the Project Site with an economically viable designed project with comprehensive ground-level landscape and entry upgrades and a new hotel building with guestrooms, spa and meeting rooms, and restaurants to support anticipated market demand.
3. Preserve views to and from the Hollywood Hills by developing a hotel building that is compatible with the height and massing of nearby high-rise buildings while aligning the building in a way that preserves existing view corridors from public viewing areas.
4. Provide efficient and convenient site access for all modes of transportation, and enhance pedestrian circulation and bicycle amenities.
5. Strengthen the economic vitality of the local area by expanding employment opportunities and visitor-serving uses through construction and operation of an infill project within a TPA on a site that is served by existing infrastructure and would generate additional annual tax revenues to the City, including sales taxes and transient occupancy taxes.
6. Support the City’s commitment to green building design, conservation, recycling, and sustainability through sustainable design and construction that promotes resource conservation, including waste reduction, efficient water management techniques, and conservation of energy.

6. Alternatives Analysis

a) Alternative 1: No Project/No Build Alternative

(1) Description of the 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 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.

(2) Environmental Impacts

(a) Air Quality

(i) Consistency with Air Quality Management Plan

(a) Construction

Alternative 1 would not involve any new construction or generate any new pollutants that would exceed South Coast Air Quality Management District (SCAQMD) or California Air Resources Board (CARB) standards since no new development would be developed. As such, the No Project/No Build Alternative would have no impact with respect to emissions or other criteria and SCAQMD’s Air Quality Management Plan (AQMP) standards. Therefore, construction-related impacts related to conflict or obstruction of the implementation of the AQMP would not occur under Alternative 1. With implementation of Mitigation Measures AQ-MM-1 (Construction Equipment Features) to reduce construction emissions of NO_x, the Project would not conflict with or obstruct the implementation of the AQMP. Thus, since implementation of a mitigation measure is required for the Project but not this Alternative, impacts related to conflict or obstruction of the implementation of the AQMP during construction under Alternative 1 would be less when compared to the Project’s less than significant impact (after mitigation).

(b) Operation

Alternative 1 would not involve any new or additional uses or occupation of the Project Site compared to existing conditions. As such, no new operational emissions would be generated relative to existing conditions and Alternative 1 would have no impact with respect to emissions or other criteria and SCAQMD’s AQMP standards. Therefore, operational-related impacts related to conflict or obstruction of the implementation of the AQMP would not occur under Alternative 1. The Project would implement TRAF-PDF-1 (TDM Program) which would result in a 19.5 percent reduction in overall VMT for the Project and resultant pollutant emissions. With this Project Design Feature, the Project

would not conflict with or obstruct the implementation of the AQMP. Thus, since the Project would require implementation of a TDM Program that would not be required for this Alternative, impacts related to conflict or obstruction of the implementation of the AQMP during operational under Alternative 1 would be less when compared to the Project's less than significant impact (with TDM Program).

(ii) *Cumulatively Considerable Increase in Criteria Pollutants*

(a) Construction

Alternative 1 would not involve any new construction or generate any new criteria pollutant emissions since no new construction activities would be proposed. As such, Alternative 1 would have no impact regarding a cumulatively considerable increase in criteria pollutant emissions. With implementation of Mitigation Measure AQ-MM-1 (Construction Equipment Features) to reduce construction emissions of NO_x to below the regional emission significance threshold, the Project would not result in a cumulatively considerable increase in nonattainment criteria pollutants. Thus, since the Project would require implementation of a mitigation measure that is not required for this Alternative, impacts related to a cumulatively considerable increase in nonattainment criteria pollutants during construction under Alternative 1 would be less when compared to the Project's less than significant impact (after mitigation).

(b) Operation

Alternative 1 would not involve any new or additional occupancy or use of the Project Site compared to existing conditions. As such, no new operational emissions would be generated relative to existing conditions and Alternative 1 would have no impact regarding a cumulatively considerable increase in criteria pollutant emissions. Operation of the Project would not result in a cumulatively considerable net increase of any criteria pollutant and impacts would be less than significant. Thus, since this Alternative would generate no new emissions, impacts related to a cumulatively considerable increase in nonattainment criteria pollutants during operation under Alternative 1 would be less when compared to the Project's less than significant impact.

(iii) *Exposure of Sensitive Receptors to Pollutant Concentrations – Localized Emissions*

(a) Construction

Alternative 1 would not involve any new construction or generate any new localized construction emissions since no new construction activities would be proposed. As such, Alternative 1 would have no impact relative to the generation of localized emissions. Construction of the Project would generate localized emissions but would not exceed the significance thresholds. As a result, construction of the Project would not expose sensitive receptors to substantial pollutant concentrations and would result in less than significant impacts. Thus, since this Alternative would not generate any new emissions, impacts

related to exposure of sensitive receptors to substantial pollutant concentrations during construction under Alternative 1 would be less when compared to the Project's less than significant impact.

(b) Operation

Alternative 1 would not involve any new or additional occupancy or use of the Project Site compared to existing conditions. As such, Alternative 1 would result in no new operational localized emissions and no impacts to sensitive receptors. Operation of the Project would generate localized emissions but would not exceed the significance thresholds. As a result, operation of the Project would not expose sensitive receptors to substantial pollutant concentrations and would result in less than significant impacts. Thus, since this Alternative would generate no new emissions, impacts related to exposure of sensitive receptors to substantial pollutant concentrations during operation under Alternative 1 would be less when compared to the Project's less than significant impact.

(iv) *Carbon Monoxide Hotspots*

Alternative 1 would not involve any new or additional occupancy or use of the Project Site compared to existing conditions. As such, Alternative 1 would not generate any new vehicle trips compared to existing conditions and would not cause or contribute to CO hotspots. Thus, no CO hotspot impacts would occur. The Project would generate new vehicle trips but would result in less than significant impacts regarding CO hotspots. Thus, since this Alternative would generate no new vehicle trips, impacts related to exposure of sensitive receptors to substantial pollutant concentrations during operation under Alternative 1 would be less when compared to the Project's less than significant impact.

(v) *Toxic Air Contaminants*

(a) Construction

Alternative 1 would not involve any new construction or demolition activity. As such, Alternative 1 would not generate construction-related toxic air contaminants (TACs) emissions and would result in no impacts associated with construction TAC emissions. The Project would generate construction TAC emissions and would implement Mitigation Measure AQ-MM-1 (Construction Equipment Features) to reduce construction-related NO_x emissions, which would have co-benefits of reducing TAC emissions. With mitigation, construction of the Project would result in less than significant impacts. Thus, since implementation of a mitigation measure is needed for the Project but not for this Alternative, impacts related to exposure of sensitive receptors to substantial pollutant concentrations during construction under Alternative 1 would be less when compared to the Project's less than significant impact (after mitigation).

(b) Operation

Alternative 1 would not involve any new or additional occupancy or use of the Project Site compared to existing conditions. Under Alternative 1, the Existing Hotel Building would continue in operation and would not generate any new operational TAC emissions.

Operation of the Project would generate only minor amounts of diesel emissions from mobile sources, such as delivery trucks and from other sources such as hotel cleaning products, charbroilers, and emergency generators. Project impacts regarding operational TAC emissions would be less than significant. Thus, since there would be no new TAC emissions under this Alternative, impacts related to exposure of sensitive receptors to substantial pollutant concentrations during operation under Alternative 1 would be less when compared to the Project's less than significant impact.

(b) Biological Resources

(i) Candidate, Sensitive, or Special-Status Species

Alternative 1 would not require ground disturbance, tree removal, or habitat disturbance that would directly or indirectly impact candidate, sensitive, or special-status species. The Project would implement Mitigation Measure BIO-MM-1 (Special-Status Bat Species). With mitigation, construction of the Project would result in less than significant impacts. Thus, because there would be no ground disturbance, tree removal, or habitat disturbance that would directly or indirectly impact candidate, sensitive, or special-status species, impacts related to special-status species under Alternative 1 would be less when compared to the Project's less than significant impact (after mitigation).

(ii) Wildlife Movement and Corridors or Wildlife Nursery Sites

Alternative 1 would not result in any construction or new uses on the Project Site that would impact wildlife movement or corridors. The Project Site is in an urbanized area and the Project would not result in changes during construction or operation that would impact movement of native wildlife species. The Project would result in a less than significant impact. Thus, because there would be no impact to wildlife movement or corridors, impacts related to wildlife movement under Alternative 1 would be less when compared to the Project's less than significant impact.

Alternative 1 would not result in any construction or new uses on the Project Site that would impact wildlife nursery sites. The Project Site contains palms that provide roosting habitat for special-status bat species and other trees and vegetation that provide nesting habitat for birds. The Project would implement Mitigation Measure BIO-MM-1 (Special-Status Bat Species) and would comply with regulations such as the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGF) Section 3503. With mitigation, construction of the Project would result in less than significant impacts. Thus, because there would be no impact to wildlife nursery sites, impacts related to wildlife nursery sites under Alternative 1 would be less when compared to the Project's less than significant impact (with mitigation).

(iii) Conflict with Policies or Ordinances Protecting Biological Resources

Alternative 1 would not result in any construction or new uses on the Project Site that would conflict with policies or ordinances protecting biological resources. The Project

would require removal of trees on the Project Site and would be subject to the tree replacement requirements pursuant to the Department of City Planning and/or the City's Urban Forestry Division. The Project would result in a less than significant impact related to policies and ordinances protecting biological resources. Thus, because there would be no impact to or conflicts with policies or ordinances for the protection of biological resources under Alternative 1, impacts would be less when compared to the Project's less than significant impact.

(c) *Cultural Resources*

(i) *Historical Resources*

Alternative 1 would not require any construction activities, demolition of existing buildings, or construction of new buildings that may impact the significance of a historical resource. The Project would not cause an adverse change in the significance of a historical resource. Further, the Project would not reduce or materially impair the integrity or significance of important historical resources in the Project vicinity. Therefore, direct and indirect impacts under the Project would be less than significant. Thus, because there would be no demolition of existing buildings, or construction of new buildings that may impact the significance of a historical resource under Alternative 1, there would be no impacts when compared to the Project's less than significant impact.

(ii) *Archaeological Resources*

Alternative 1 would not require excavation, whereas the Project would require excavation for the parking garage expansion, retaining wall, surface parking, and the provision of appropriate foundations for the Hotel Expansion Building. Although the Project would not cause an adverse impact on an archaeological source, there would be no potential to encounter archeological resources during excavation under Alternative 1. Thus, impacts related to archeological resources under Alternative 1 would be less when compared to the Project's less than significant impact.

(d) *Energy*

(i) *Construction*

Alternative 1 would not involve any construction at the Project Site and, as such, would have no impact relative to construction-related energy resources such as diesel, gasoline, and electricity. Construction of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy, nor conflict with energy related plans and, as such, energy impacts would be less than significant. Thus, because Alternative 1 would have no impact related to construction-related energy demand, impacts would be less under Alternative 1 as compared to the Project's less than significant impact.

(ii) *Operation*

Alternative 1 would not involve any new or additional use of the Project Site compared to existing conditions and, as such, would have no impact relative to energy resources.

Operation of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy, nor conflict with energy-related plans and, as such, energy impacts would be less than significant. Impacts would be less under Alternative 1 as compared to the Project's less than significant impact.

(e) *Geology and Soils*

(i) *Geologic, Seismic, and Soil Hazards*

Alternative 1 would not increase the number of people at the Project Site that could potentially be exposed to seismic hazards compared to the Project because new or additional use of the Project Site compared to existing conditions would not occur. Furthermore, Alternative 1 would not involve any construction that would occur under the Project, including grading and excavation to construct the parking garage expansion and appropriate foundations. Project impacts would be less than significant through the City approval of a final geotechnical report with project-specific recommendations to meet applicable State and City regulatory requirements and the presence of a qualified geotechnical engineer during construction. Although Project impacts relative to seismic, geologic, or soils hazards would be less than significant, Alternative 1 would result in no impacts relative to seismic or other geologic and soils hazards. As such, geologic, seismic and soil hazards impacts would be less under Alternative 1 as compared to the Project's less than significant impact.

(ii) *Paleontological Resources*

Alternative 1 would not involve the excavation that would be required with the Project. Unlike the Project, there would be no potential to encounter paleontological resources in previously undisturbed soils. Although the Project would mitigate potential impacts on paleontological resources to a less than significant level, Alternative 1 would not involve excavation, and, thus, no impacts on paleontological resources would occur in comparison to the Project's less than significant impact (with mitigation).

(f) *Greenhouse Gas Emissions*

Alternative 1 would not include the construction or operation of any new buildings or provide for any changes on the Project Site. Alternative 1 would not generate any new GHG emissions compared to existing conditions. The Project would result in new GHG emissions during construction and operation of the proposed uses but would not conflict with applicable GHG reduction plans and policies outlined in the 2022 Scoping Plan Update, 2025–2045 RTP/SCS, the City's Green New Deal, and the Los Angeles Green Building Code for reducing GHG emissions and Project impacts would be less than significant. However, since Alternative 1 would not include any new construction or operation, impacts related to GHG emissions under Alternative 1 would not occur and would be less as compared to the Project's less than significant impact.

(g) *Hydrology and Water Quality*

(i) *Water Quality Standards*

Under Alternative 1, existing uses would remain and no new construction would occur. No modifications to the existing drainage patterns, quantity, or type and quality of runoff generated from the Project Site would occur. Impacts on surface water quality due to excavation, grading, and dewatering were identified as less than significant for the Project with adherence to applicable regulations. As no excavation, grading, or building construction would occur Alternative 1, no construction-related impacts would occur. However, Alternative 1 would not include the development of the on-site structural best management practices (BMPs) that would be implemented under the Project, and thus stormwater would continue to flow untreated by structural BMPs to the City's stormwater system. As a result, because there are no existing structural BMPs in place at the Project Site, upon Project buildout, less pollutants would be transported through the conveyance systems into local watersheds and the ocean than under Alternative 1. As such, Alternative 1 impacts related to water quality would be less than significant but greater under Alternative 1 as compared to the Project's less than significant impacts.

(ii) *Alter Existing Drainage*

Under Alternative 1, existing uses would remain and no new construction would occur. No modifications to the existing drainage patterns would occur. Improvements that would be implemented under the Project, such as Low Impact Development (LID) BMPs (i.e., capture and reuse from catch basins, and landscaped areas providing filtration with planter drains) designed to prevent an increase in stormwater discharge rates, would not occur under Alternative 1. As such, Alternative 1 impacts would be less than significant but greater under Alternative 1 as compared to the Project's less than significant impacts.

(iii) *Conflict with a Water Quality Control Plan or Sustainable Groundwater Management Plan*

Under Alternative 1, existing uses would remain and no new construction would occur. No modifications to the existing drainage patterns, quantity, or type and quality of runoff generated from the Project Site would occur. The Project Site is within the jurisdiction of the Water Quality Compliance Master Plan for Urban Runoff, which was developed by the City's Department of Public Works and includes within its provisions the description of BMPs required by the City for stormwater quality management. While no excavation, grading, or building construction would occur under Alternative 1, neither would the development of the on-site structural BMPs, and stormwater would continue to flow untreated by structural BMPs to the City's stormwater system. Nonetheless, Alternative 1 would not conflict with a water quality control plan or sustainable groundwater management plan and would avoid the Project's less than significant impact on hydrology and water quality impacts. Therefore, impacts would be less under Alternative 1 as compared to the Project's less than significant impact.

(h) *Land Use and Planning*

Under Alternative 1, there would be no land use changes to the Project Site and the existing hotel uses on the site would remain within the existing C2 zone. As such, there would be no requests for any discretionary actions or approvals, including no requests for Vesting Zone changes. Because no changes would occur on the Project Site under Alternative 1, Alternative 1 would not conflict with any City and regional plans and policies related to development. No changes with respect to existing land use patterns would occur under Alternative 1. However, unlike the Project, Alternative 1 would not further regional and local policies to providing employment and visitor destinations within TPAs or enhancing pedestrian and bicycle activity near transit because the Project would not be constructed. The Project was determined to result in a less than significant land use impact without the need to incorporate mitigation measures. Under Alternative 1, no impacts related to land use would occur and as such, impacts would be less under Alternative 1 as compared to the Project's less than significant impact.

(i) *Noise and Vibration*

(i) *Noise*

(a) *Construction*

Alternative 1 would not involve any construction activities and, therefore, would not generate construction noise impacts. As such, Alternative 1 would have no impact with respect to construction noise. The Project would generate construction noise levels above threshold of significance standards at receptors R1, and R3 through R5. The Project would implement Mitigation Measures NOI-MM-1 (Noise Barriers) and MM-NOI-2 (Construction Equipment Noise Shielding and Muffling Devices), as applicable, and Project Design Features NOI-PDF-1 and NOI-PDF-2 to reduce noise levels in excess of ambient noise standards. Even with mitigation, the Project would exceed established standards at receptor R1 and would result in a significant and unavoidable construction noise impact. Alternative 1, which would not involve any new construction would avoid the Project's significant and unavoidable construction noise impacts. Since Alternative 1 would have no impact with respect to construction noise, impacts under Alternative 1 would be less than the Project's significant and unavoidable construction noise impact (after mitigation).

(b) *Operation*

Alternative 1 would not involve any new development that would introduce new stationary or mobile noise sources to the Project Site. Operation of the Project would generate noise from one-site stationary and off-site mobile noise sources but impacts would be less than significant. Since Alternative 1 would not involve any change in the existing noise environment, noise impacts under Alternative 1 would be less than the Project's less than significant impact.

(ii) *Vibration*

Alternative 1 would not involve any construction activities and, therefore, would not generate construction vibration impacts. As such, Alternative 1 would have no impact with respect to construction vibration. In addition, Alternative 1 would not involve any new development that would introduce new sources of vibration to the Project Site. While the Project would involve construction activities that would generate vibration on the Project Site, the Project would generate vibration levels that would not exceed the applicable thresholds of significance. Since Alternative 1 would not involve any vibration generating activities, vibration impacts under Alternative 1 would be less than the Project's less than significant impact.

(a) *Public Services*

(i) *Fire Protection*

Under Alternative 1, no increased demand for fire protection and emergency medical services would occur and there would be no effect on emergency response times or emergency access, as would occur under the project from construction activities and project operations. While the Project would involve construction activities and intensify the use of the Project Site, impacts on fire protection and emergency access would be less than significant with incorporation of Project Design Features and compliance with applicable regulatory requirements. Further, under the Project, the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility, is not foreseeably needed to maintain service and the potential for physical impacts associated with construction of fire facilities are considered less than significant. Alternative 1 would not result in impacts to fire protection and emergency access. Therefore, the impact of Alternative 1 on fire protection and emergency access would be less as compared to the Project's less than significant impact.

(ii) *Police Protection*

Alternative 1 would not change existing conditions or increase the level of activity at the Project Site and therefore would not alter demand for police protection services or affect emergency response times. In contrast, the Project would result in construction and operational activities that could increase demand for police protection services. These impacts associated with the Project would be less than significant as the Project would incorporate Project Design Features POL-PDF-1 and POL-PDF-2, which provide on-site security features for construction and operation. Further, under the Project, the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility, is not foreseeably needed to maintain service and the potential for physical impacts associated with construction of fire facilities are considered less than significant. Alternative 1 would not result in impacts to police protection services. Therefore, the impact of Alternative 1 on police protection services would be less as compared to the Project's less than significant impact.

(b) *Transportation and Circulation*

(i) *Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities*

Alternative 1 would not involve any new or additional occupancy or use of the Project Site compared to existing conditions and, as such, would have no impact regarding conflicts with programs, plans, ordinances or policies addressing the circulation system, transit, roadways, bicycle and pedestrian facilities. While the Project would develop additional uses on the Project Site that would generate new sources of traffic, the Project would not result in any substantial conflicts with programs, plans, ordinances or policies addressing transportation issues and, therefore, impacts would be less than significant. Thus, because Alternative 1 would have no impact in this regard as it neither implements nor conflicts with any mobility plan objectives, impacts would be less as compared to the Project's less than significant impact.

(ii) *Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)*

Alternative 1 would not involve any new or additional use of the Project Site compared to existing conditions. Thus, no impacts regarding VMT would occur under Alternative 1. The Project's daily employee and visitor/guest VMT would be below the City's thresholds and, therefore, impacts would be less than significant. Thus, because Alternative 1 would not generate any new vehicle trips or VMT, impacts would be less as compared to the Project's less than significant impact.

(iii) *Geometric Design Hazards*

Alternative 1 would not generate any new vehicle trips or change the transportation design features in and around the Project Site. Alternative 1 would result in no impacts regarding geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses, or impacts to freeway safety. The Project is projected to add additional vehicles to one freeway off-ramp during the weekday PM peak hour. Queue lengths would not extend onto the freeway mainline and, as such, the Project would not result in a safety impact. Therefore, Project impacts on freeway safety would be less than significant. Thus, because Alternative 1 would have no impact with respect to geometric design hazards or freeway off-ramp queues, impacts would be less as compared to the Project's less than significant impact.

(c) *Tribal Cultural Resources*

Alternative 1 would not involve any ground disturbance or excavation activities that would potentially encounter previously undiscovered tribal cultural resources and, as such, would have no impact related to such resources. Excavation for the Project would be required for parking garage expansion and building foundations. Impacts related to tribal cultural resources during Project construction would be less than significant with

adherence to the City's conditions of approval for the treatment of inadvertent tribal cultural resource discoveries. Thus, because Alternative 1 would have no impact related to tribal cultural resources, impacts would be less as compared to the Project's less than significant impact.

(d) *Utilities and Service Systems*

(i) *Water Supply*

Alternative 1 would not add population or new facilities at the Project Site; therefore, water demand for Alternative 1 would be consistent with the existing operation of the on-site hotel uses and no impact would occur. In contrast, the Project would increase on-site water demand by approximately 78,764 gallons per day (gpd), with implementation of Project Design Feature WS-PDF-1 that includes water conservation features for the Project's plumbing features, landscaping and irrigation, and pools. Water infrastructure and water supply are sufficient to meet project demand without mitigation; and the Project impact on the provision of water services would be less than significant. Thus, because no impact would occur under Alternative 1, impacts would be less as compared to the Project's less than significant impact.

(ii) *Wastewater*

Alternative 1 would not increase population or develop new or expanded uses at the Project Site; therefore, wastewater generation for Alternative 1 would be consistent with the existing operation of the on-site hotel uses. Alternative 1 would result in no additional wastewater flows to the Hyperion Treatment Plant. In contrast, the Project would increase on-site wastewater generation by approximately 171,645 gpd that would need conveyance and treatment. Thus, the Project's additional wastewater would be within the capacity limits of the conveyance and treatment facilities serving the Project Site, and impacts would be less than significant. Since no impact would occur under Alternative 1, impacts would be less as compared to the Project's less than significant impact.

(3) Comparison of Impacts

As evaluated above, 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.

(4) Relationship of the Alternative to Project Objectives

As described above, Alternative 1 assumes that no new development would occur on the Project Site. The on-site hotel uses would continue to operate similar to existing conditions. As Alternative 1 would not include the development program shown in Table II-2 of Chapter 2, *Project Description*, of this Draft EIR, it would not contribute to the Hilton

Universal City Hotel's position as a hub for regional commerce with convenient visitor access to the surrounding tourist and entertainment destinations and therefore it would not achieve any of the Project Objectives, all of which are listed below.

Objective 1: Expand hotel capacity and local employment opportunity through infill development on a parcel located within close proximity to tourist destinations, entertainment-related uses, and transit centers, thereby promoting local, regional, and state land use and mobility objectives, enabling visitors to use alternate modes of transportation (e.g., walking, bicycling, transit), and reducing vehicle miles traveled.

Objective 2: Maximize the usefulness of the Project Site by redeveloping underutilized portions of the property and upgrading other areas of the Project Site with an economically viable designed project with comprehensive ground-level landscape and entry upgrades and a new hotel building with guestrooms, spa and meeting rooms, and restaurants to support anticipated market demand.

Objective 3: Preserve views to and from the Hollywood Hills by developing a hotel building that is compatible with the height and massing of nearby high-rise buildings while aligning the building in a way that preserves existing view corridors from public viewing areas.

Objective 4: Provide efficient and convenient site access for all modes of transportation, and enhance pedestrian circulation and bicycle amenities.

Objective 5: Strengthen the economic vitality of the local area by expanding employment opportunities and visitor-serving uses through construction and operation of an infill project within a TPA on a site that is served by existing infrastructure and would generate additional annual tax revenues to the City, including sales taxes and transient occupancy taxes.

Objective 6: Support the City's commitment to green building design, conservation, recycling, and sustainability through sustainable design and construction that promotes resource conservation, including waste reduction, efficient water management techniques, and conservation of energy.

b) Alternative 2: New Parking Garage Alternative

(1) Description of the 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 2 would be the same as under the Project.

Figure V-1, *Alternative 2 – Conceptual Site Plan*, and **Figure V-2, *Alternative 2 – Axonometric View*, illustrate Alternative 2's ground level plan and the vertical projection of the proposed buildings to compare building height, respectively.**

(2) Environmental Impacts

(a) Air Quality

(i) Consistency with Air Quality Management Plan

(a) Construction

The 2022 AQMP includes growth projections in its assessment for achieving air quality goals based on assumptions in the SCAG 2020–2045 RTP/SCS regarding population, housing, and employment growth trends. Similar to the Project, Alternative 2 would result in an increase in short-term employment during construction because the proposed development of hotel, restaurant, pool, landscaping, and other amenity areas would remain the same as under the Project. Also, similar to the Project, construction jobs under Alternative 2 would be temporary in nature and last through the completion of construction activities and not generate long-term increases in employment growth. As such, construction jobs would not conflict with the long-term employment projections upon which the AQMP is based.

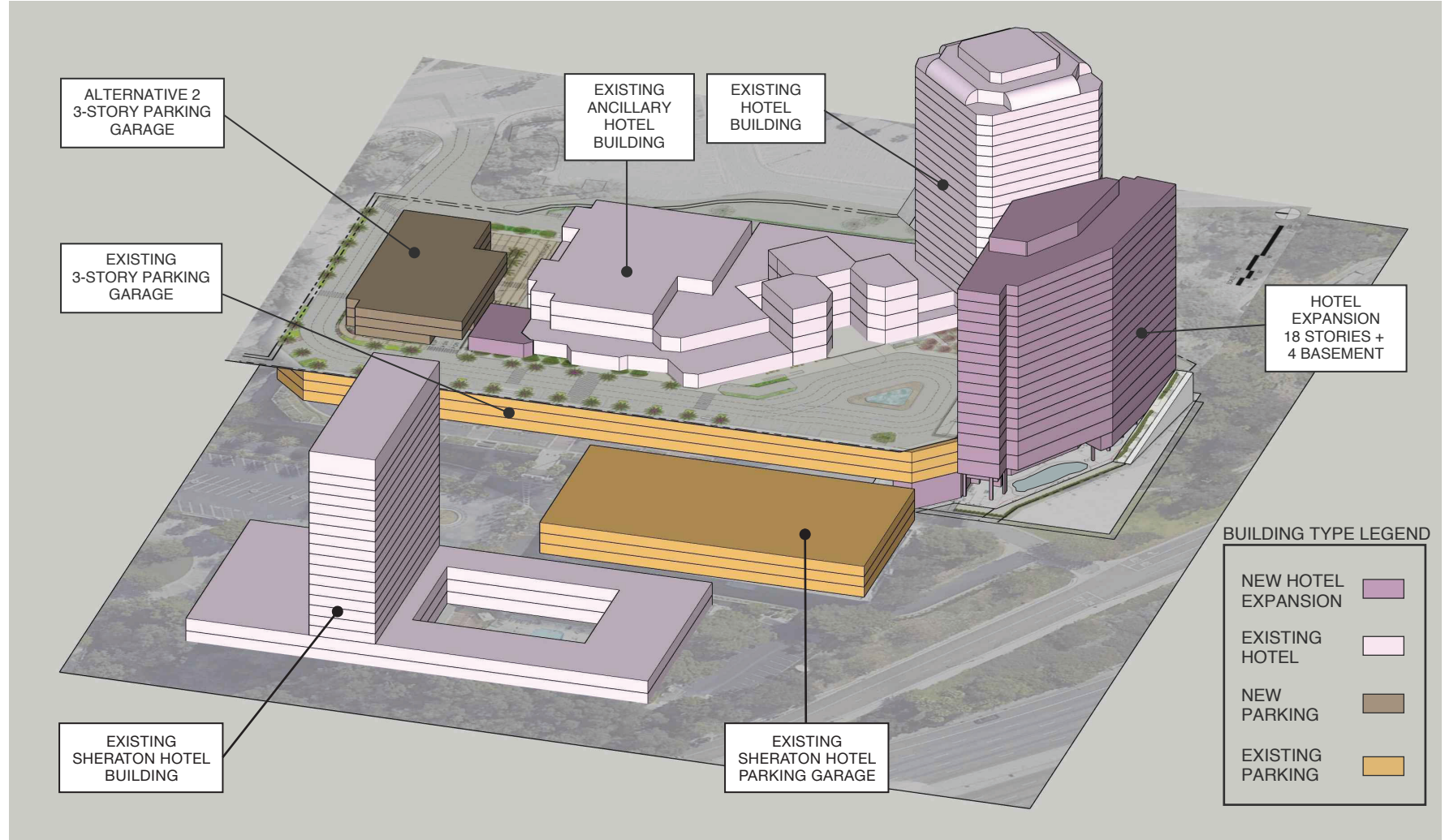
Like the Project, construction of Alternative 2 would be required to comply with CARB's requirements to reduce short-term emissions from on-road and off-road diesel equipment, and with SCAQMD's regulations, such as Rule 403 for controlling fugitive dust and Rule 1113 for controlling VOC emissions from architectural coatings. Also, like the Project, Alternative 2 would be required to utilize construction contractors in compliance with State on-road and off-road vehicle rules, including the air toxics control measure (ATCM) that limits heavy-duty diesel motor vehicle idling to five minutes at any location (Title 13 CCR, Section 2485), the Truck and Bus regulation that reduces NO_x, PM₁₀, and PM_{2.5} emissions from existing diesel vehicles operating in California (13 CCR, Section 2025), and the In-Use Off-Road Diesel Fueled Fleets regulation that reduces emissions by the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission controlled models (13 CCR, Section 2449). As such, Alternative 2 would not conflict with implementation of these strategies. Compliance with these requirements under Alternative 2 is consistent with and meets or exceeds the AQMP control strategies.



SOURCE: Ankrom Moisan Architects, Inc., 2023

Hilton Universal City Project

Figure V-1
Alternative 2 – Conceptual Site Plan



SOURCE: Ankrom Moisan Architects, Inc., SALT Landscape Architects, 2023

Hilton Universal City Project

Figure V-2
Alternative 2 – Axonometric View

Alternative 2 would reduce the construction activities required for excavation of the parking garage expansion and would therefore reduce the Project's overall construction emissions by reducing emissions from construction equipment and haul trucks. For Alternative 2, the total soil export would be reduced from 87,000 CY to 39,300 CY, an approximately 55 percent reduction. Therefore, Alternative 2 would correspondingly result in a 55 percent reduction of total construction-related emissions of NO_x, resulting primarily from reduced total number of heavy-duty trucks required for on-road soil hauling. Since Alternative 2 would reduce the total number of haul truck trips required to export soil and reduce the number of days with haul truck trips by approximately 55 percent (from approximately 87 days to approximately 40 days based on the corresponding 55 percent reduction in grading quantities), the duration of emissions during the grading phase under Alternative 2 would be reduced. However daily emission could still exceed the SCAQMD daily thresholds of significance since daily construction activities levels would be similar to the Project. Implementation of Mitigation Measures AQ-1 (Construction Equipment Features) would reduce the Project's and Alternative 2's construction emissions of NO_x, and regional air quality impacts would be reduced to less than significant. Therefore, similar to the Project, construction activities under Alternative 2 would not conflict with or obstruct implementation of the AQMP, and impacts would be less than significant. However, because Alternative 2 would reduce the scale of grading activities, it would result in reduced total emission levels and result in less delay in the timely attainment of air quality standards specified in the AQMP. Therefore, the duration of impacts related to consistency with the AQMP would be less under Alternative 2 as compared to the Project, but both Alternative 2 and the Project would have a less than significant impact (with mitigation).

(b) Operation

Similar to the Project, Alternative 2 would include new development on the Project Site that would generate new criteria pollutant emissions. As with the Project, Alternative 2 would be consistent with the goals of SCAG's 2016-2040 and 2020-2045 RTP/SCSs and growth projections in the AQMP, since the growth would occur in a HQTa and a TPA. Like the Project, Alternative 2 would also be consistent with applicable goals, objectives, and policies of the Air Quality Element of the General Plan (Air Quality Element) that support and encourage transportation efficiency as the Project Site is located within a designated HQTa and TPA, with access to regional transportation facilities in the Project Site vicinity, including the Metro B Line (Red Line) Universal City/Studio City Station and Metro bus lines along Lankershim Boulevard in the Project vicinity, which would reduce vehicle trips and VMT for both the Project and Alternative 2. As such, both the Project and Alternative 2 would be consistent with the Air Quality Element and would not obstruct implementation of the AQMP. The AQMP includes Transportation Control Measures that are intended to reduce regional mobile source emissions. While the majority of the measures are implemented by cities, counties, and other regional agencies such as SCAG and SCAQMD, Alternative 2 would be supportive of measures related to reducing vehicle trips for patrons and employees and increasing commercial density near public transit. Similar to the Project, Alternative 2 would be consistent with the growth projections

in the AQMP and would be supportive of relevant Transportation Control Measures aimed at reducing vehicle trips. Impacts would be less than significant under Alternative 2 and similar to the Project's less than significant impact (with mitigation).

(ii) *Cumulatively Considerable Increase in Criteria Pollutants*

(a) Construction

As with the Project, Alternative 2's construction activities have the potential to generate temporary regional criteria pollutant emissions VOC, NOx, and CO through the use of construction equipment, vehicle trips generated by workers, and haul trucks traveling to and from the Project Site. Construction-related daily emissions of VOC, under both Alternative 2 and the Project, would exceed the SCAQMD thresholds of significance. Alternative 2 would reduce construction-related emissions of NOx, resulting primarily from heavy-duty trucks required for on-road soil hauling. For Alternative 2, the total soil export would be reduced from 87,000 CY to 39,300 CY, an approximately 55 percent reduction. While Alternative 2 would reduce the number of days with haul truck trips and reduce the duration of emissions during the grading phase by approximately 55 percent (from approximately 87 days to approximately 40 days based on the corresponding 55 percent reduction in grading quantities), the maximum daily regional air pollutant emissions from the overlap of multiple construction phases, could still exceed the SCAQMD daily thresholds of significance since daily construction activities levels would be similar to the Project. However, with implementation of Mitigation Measure AQ-MM-1, emissions would be reduced to below the SCAQMD's daily significance thresholds for both Alternative 2 and the Project. In addition, because Alternative 2 would reduce grading activities and hauling by approximately 55 percent, it would contribute fewer days of grading emissions and fewer days of overlapping construction emissions than the Project. Therefore, construction emission impacts would be less as compared to the Project's less than significant impact (with mitigation).

(b) Operation

During operation, Alternative 2 would generate emissions associated with vehicle trips, heating, lighting, other electric and natural gas power requirements, emergency generators, and architectural coatings. However, for Alternative 2 the parking garage would be maintained as is. Alternative 2 would eliminate the Project's expansion of the existing parking garage; reduce the Project's 464 new parking spaces to 360 new spaces, a reduction of approximately 22 percent; and locate all new parking in a new 3-story parking garage over the North Plaza. While Alternative 2 would reduce on-site parking compared to the Project, VMT under Alternative 2 and the Project would be the same because the proposed development of hotel, restaurant, pool, landscaping, and other amenity areas would remain the same as under the Project. As such, operational mobile source emissions would also be the same as the Project. Operational emissions of the Project and Alternative 2 would be below the SCAQMD significance thresholds. Thus,

operational impacts related to criteria pollutants under Alternative 2 would be similar to the Project's less than significant impact.

(iii) Exposure of Sensitive Receptors to Pollutant Concentrations –Localized Emissions

(a) Construction

Alternative 2, which would eliminate excavation for the parking garage expansion, would reduce the Project's grading and export (hauling) of removed soils by approximately 55 percent. Unlike regional emissions, localized emissions are specific to sensitive receptors in the local project area. Under Alternative 2, maximum daily localized emissions would be similar to the Project since daily construction activities levels would be similar to the Project. Thus, as with the Project, Alternative 2 and the Project's maximum daily localized emissions from construction would not exceed the SCAQMD localized significance thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. However, given the approximately 55 percent reduction in grading quantities under Alternative 2, the duration of grading-related emissions would be shortened under Alternative 2 by approximately 55 percent (from approximately 87 days to approximately 40 days based on the corresponding 55 percent reduction in grading quantities). Thus, Alternative 2's impacts related to exposure of sensitive receptors to localized pollutant concentrations would be less than the Project's less than significant impact.

(b) Operation

Alternative 2 would result in reduced onsite parking compared to the Project, but would result in a similar floor area, layout, and occupancy of the Project Site as under the Project because the proposed development of hotel, restaurant, pool, landscaping, and other amenity areas would remain the same as under the Project. The Project's daily localized emissions of NO_x, PM₁₀, and PM_{2.5} related to energy use, emergency generators, charbroilers, and use of coatings, consumer products would not exceed the SCAQMD's significance thresholds and impacts would be less than significant. Thus, as Alternative 2 would have the same mix of uses as the Project, except for reduced onsite parking, impacts related to exposure of sensitive receptors to localized concentration of pollutants under Alternative 2 would be similar to the Project's less than significant impact.

(iv) CO Hotspots

While Alternative 2 would reduce on-site parking compared to the Project, traffic volumes and VMT under Alternative 2 and the Project would be the same because the proposed development of hotel, restaurant, pool, landscaping, and other amenity areas would remain the same as under the Project. The most heavily impacted intersection in the Project Site area with the potential to result in CO hotspots is Barham Boulevard and Cahuenga Boulevard. During operation, CO concentrations from the Project's maximum operational traffic volume at this intersection plus the measured background level in the Project Site area are expected to be approximately 4.5 parts per million (ppm) (one-hour average) and 3.3 ppm (eight-hour average). These levels would not exceed the numerical

thresholds of significance and Project impacts related to CO hotspots would be less than significant. Because Alternative 2 would have the same traffic volumes and VMT as the Project, impacts related to CO hotspots would be similar to the Project's less than significant impact.

(v) *Toxic Air Contaminants*

(a) *Construction*

As with the Project, Alternative 2 would require the reconfiguration of the existing circulation and North and South Plazas. However, the existing parking garage would be maintained as is. Alternative 2 would eliminate the Project's expansion of the existing parking garage; reduce the Project's 464 new parking spaces to 360 new spaces, a reduction of approximately 22 percent; and locate all new parking in a new 3-story parking garage over the North Plaza. While the total soil export would be reduced from 87,000 CY to 39,300 CY under Alternative 2, Alternative 2 would generate similar maximum daily emissions as the Project. Alternative 2 would reduce the number of days with haul truck trips and reduce the duration of emissions during the grading phase by approximately 55 percent (from approximately 87 days to approximately 40 days based on the corresponding 55 percent reduction in grading quantities).

Under both Alternative 2 and the Project, TAC emissions associated with DPM emissions from heavy construction equipment would occur during the construction phase. The Project would comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location and the CARB In-Use Off-Road Diesel Vehicle Regulation. Compliance with these CARB regulations would minimize emissions of TACs during construction. Hazardous materials present in the existing on-site structures or infrastructure, such as asbestos-containing materials or lead based paint, could be exposed during demolition. If present, the hazardous materials are required to be managed and disposed of in accordance with applicable laws and regulations. Further, the Project would implement Mitigation Measure AQ-MM-1 (Construction Equipment Features), which would provide the co-benefits of reducing TAC emissions of PM10 and PM2.5 from heavy-duty diesel construction equipment. Project impacts related to construction TAC emissions would be less than significant. Like the Project, Alternative 2 would also comply with the CARB rules and regulations and would also implement Mitigation Measure AQ-MM-1. Thus, like the Project, construction TAC impacts for Alternative 2 would be less than significant. Because Alternative 2 would reduce the duration of excavation activities by approximately 55 percent (from approximately 87 days to approximately 40 days based on the corresponding 55 percent reduction in grading quantities), the use of heavy equipment (loaders, excavators), and haul truck activity, it would result in fewer total TAC emissions. As such, TAC impacts under Alternative 2 would be less as compared to the Project's less than significant impact.

(b) Operation

Alternative 2, as with the Project, would generate emissions from architectural coatings, restaurant charbroiling, truck deliveries, and emergency generators. Restaurants in the South Coast Air Basin are required to comply with SCAQMD Rule 1138 emission controls. Delivery trucks are required to comply with the applicable provisions of 13 CCR, Section 2025 to minimize and reduce PM₁₀, PM_{2.5}, and NO_x emissions. Any emergency generators for either Alternative 2 or the Project would be certified to the most stringent CARB and SCAQMD Rule 1470 standards to reduce emissions to the lowest technically feasible level. Alternative 2, as with the Project, would be required to comply with SCAQMD Rule 1113 for controlling VOC emissions from architectural coatings. With existing regulations, operation of either Alternative 2 or the Project would not be considered a substantial source of DPM or other TAC emissions. Impacts under Alternative 2 would be similar as compared to the Project's less than significant impacts.

(b) *Biological Resources*

(i) *Candidate, Sensitive, or Special-Status Species*

As with the Project, Alternative 2 would require ground disturbance, tree removal, and habitat disturbance that would directly or indirectly impact candidate, sensitive, or special-status species; thus, impacts would be potentially significant. Similar to the Project, Alternative 2 would implement Mitigation Measure BIO-MM-1 (Special-Status Bat Species). With mitigation, construction of the Project and Alternative 2 would result in less than significant impacts. Therefore, Alternative 2's impacts to candidate, sensitive, or special-status species would be similar as compared to the Project's less than significant impact (after mitigation).

(ii) *Wildlife Movement and Corridors or Native Wildlife Nursery Sites*

Alternative 2 would result in construction, albeit in reduced scale/scope to the Project, and the same new uses on the Project Site as the Project, which would not impact wildlife movement or corridors. The Project Site is in an urbanized area and the Project and Alternative 2 would not result in changes during construction or operation that would impact movement of native wildlife species. Alternative 2's impacts to wildlife corridors would be similar as compared to the Project's less than significant impact.

Alternative 2 would result in construction, albeit in reduced scale/scope to the Project, and the same new uses on the Project Site as the Project that have the potential to impact wildlife nursery sites. The Project Site contains palms that provide roosting habitat for special-status bat species and other trees and vegetation that provide nesting habitat for birds. The Project and Alternative 2 would implement Mitigation Measure BIO-MM-1 (Special-Status Bat Species) and would comply with regulations such as the MBTA and CFGC. With mitigation, construction of the Project and Alternative 2 would result in less than significant impacts. Alternative 2's impacts would be similar as compared to the Project's less than significant impact (with mitigation).

(iii) *Conflict with Policies or Ordinances Protecting Biological Resources*

Alternative 2 would result in construction, albeit in reduced scale/scope to the Project, and the same new uses on the Project Site as the Project, and would not conflict with policies or ordinances protecting biological resources. The Project and Alternative 2 would require removal of trees on the Project Site and would be subject to the tree replacement requirements pursuant to the Department of City Planning and/or the City's Urban Forestry Division. The Project and Alternative 2 would result in a less than significant impact related to policies and ordinances protecting biological resources. Alternative 2's impacts would be similar as compared to the Project's less than significant impact.

(c) *Cultural Resources*

(i) *Historical Resources*

As with the Project, Alternative 2 would develop a portion of the existing Hilton Universal City Hotel site adjacent to the potential Universal Studios Historic District. However, as the Hilton Universal City Hotel does not qualify as a historic resource no direct impacts to historic resources would occur. In addition, due to the distance of the Project Site from the potential Universal Studios Historic District, other historic resources and the nature of the proposed development, no indirect impacts to surrounding historic resources would occur. Therefore, Alternative 2's impacts on historical resources would be similar as compared to the Project's less than significant impact.

(ii) *Archaeological Resources*

Under Alternative 2, as with the Project, grading and excavation into native soils would be necessary for building foundations. However, excavation would be decreased by approximately 55 percent as compared to the Project in terms of overall grading quantities, as Alternative 2 would not require excavations necessary to expand the existing parking garage. With the reduced excavation, Alternative 2 would be similar to the Project in that it would also be subject to the City's standard condition of approval to address inadvertent discovery of archaeological resources and would result in less than significant impacts to archaeological resources. Because Alternative 2 would result in less excavation and ground disturbance than the Project, and thus less likelihood of encountering unanticipated discovery of archaeological resources, Alternative 2's impacts related to archaeological resources would be the less as compared to the Project's less than significant impact.

(d) *Energy*

(i) *Construction*

As with the Project, construction of Alternative 2 would result in construction energy consumption primarily from transportation fuels (e.g., diesel and gasoline) used for haul

trucks, heavy-duty construction equipment, and construction workers traveling to and from the Project Site. Alternative 2 would result in an approximately 55 percent reduction in soil export and hauling activity. Since Alternative 2 would reduce the total number of haul truck trips required to export soil and reduce the number of days with haul truck trips by approximately 55 percent, the duration of grading would be reduced from approximately 87 days to approximately 40 days based on the corresponding 55 percent reduction in grading quantities.

Neither the Project nor Alternative 2 is expected to consume natural gas during construction but would use electricity for an on-site office as well as gasoline and diesel fuels associated with on- and off-road construction vehicles. The Project's estimated annual energy demand during construction would be 42,011 kilowatt-hours (kWh) of electricity, 41,292 gallons of gasoline, and 168,147 gallons of diesel (see Table IV.D-3 in Section IV.D, *Energy*, of this Draft EIR). The Project's demand for electricity, diesel, and gasoline would be within the handling capacity of suppliers. Construction would utilize energy only for necessary on-site activities and to transport construction materials and demolition debris to and from the Project Site. Alternative 2 would have annual energy demand during construction similar to the Project for electricity and gasoline and less demand for diesel due to the reduced haul truck trips. Thus, like the Project, Alternative 2's demand for electricity, diesel, and gasoline would be within the handling capacity of suppliers and construction would utilize energy only for necessary on-site activities and to transport construction materials and demolition debris to and from the Project Site. Neither Alternative 2 nor the Project would increase demand for electricity, diesel, or gasoline that would exceed available supply or distribution infrastructure capabilities or result in the construction of new energy facilities or expansion of existing facilities and would not result in the wasteful, inefficient, and unnecessary consumption of energy. On overall balance, Alternative 2 would result in less energy demand during construction than the Project. Impacts to energy supplies under Alternative 2 would be less as compared to the Project's less than significant impact.

(ii) *Operation*

Alternative 2 would eliminate the Project's expansion of the existing parking garage and reduce the Project's 464 new parking spaces to 360 new spaces, a reduction of approximately 22 percent parking compared to the Project, but would result in a similar floor area, layout, and occupancy of the Project Site as under the Project because the proposed development of hotel, restaurant, pool, landscaping, and other amenity areas would remain the same as under the Project. The Project's estimated annual energy demand during operations would be 5,083,145 kWh of electricity, 9,322,964 cubic feet (cf) of natural gas, 368,176 gallons of gasoline and 70,265 gallons of diesel (see Table IV.D-4 in Section IV.D, *Energy*, of this Draft EIR). Operations under the Project and Alternative 2 would result in similar energy consumption since both would provide the same square footage of the Hotel Expansion Building and Meeting Room Addition and LAMC calculated floor area (299,088 square feet) as the Project; however, the existing parking garage would be maintained as is and a new three-story parking garage would

be construction at the North Plaza. The reduction of approximately 22 percent parking under Alternative 2 compared to the Project would result in slightly reduced electricity consumption from parking uses. Thus, Alternative 2's overall energy requirements (electricity, natural gas, diesel, and gasoline) would be slightly less compared to the Project. Energy demand under either Alternative 2 or the Project would be within the handling capacity of suppliers.

Operation of both the Project and Alternative 2 would comply with the CALGreen Code's energy saving measures. In addition, Alternative 2 and the Project would comply with utilize other energy-saving measures to achieve a minimum including LEED Gold Certification and may include, but are not limited to, the use of materials and finishes that emit low quantities of volatile organic compounds (VOCs); the installation of HVAC systems that utilize ozone-friendly refrigerants; the installation of high-efficiency appliances; and the provision of bicycle parking and other amenities for bicyclists. The parking expansion under Alternative 2 or the Project would provide infrastructure for vehicular charging stations per LAMC requirements. Alternative 2 and the Project would utilize the recycling program and facilities that are currently located in the Existing Hotel Building (see Section II, Project Description, for additional details). In addition, Alternative 2 and the Project would incorporate 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 (refer to Section II, Project Description, of this Draft EIR, for additional details). The Project's water conservation features are included as Project Design Feature WS-PDF-1 (refer to Project Design Feature WS-PDF-1 (Water Conservation Features) in Section IV.M.2, Utilities and Service Systems – Water Supply, of this Draft EIR). The Project and Alternative 2 would be located within a designated HQTa and TPA, with access to regional transportation facilities in the Project Site vicinity, including the Metro B Line (Red Line) Universal City/Studio City Station and Metro bus lines along Lankershim Boulevard in the Project vicinity, which would reduce vehicle trips and VMT for both the Project and Alternative 2. Overall, Alternative 2's operational impacts on energy demand would be slightly less than as compared to the Project's less than significant impact.

(e) *Geology and Soils*

(i) *Geologic, Seismic, and Soil Hazards*

Under Alternative 2, parking would be provided in a three-level parking structure on top of the North Plaza, which would require approximately 55 percent less excavation as compared to the Project. There would be a similar level of impact associated with geologic seismic and soil hazards as the same geologic and seismic features and soils would be present as with the Project. Both Alternative 2 and the Project would be developed in accordance with site-specific design recommendations in a Final Geotechnical Report and comply with all applicable regulatory requirements related to building design and

safety. Therefore, Alternative 2's impacts related to geology and soils would be similar as compared to the Project's less than significant impact.

(ii) *Paleontological Resources*

Alternative 2 would not include the expansion of existing parking garage and would, thus, result in a 55 percent reduction in grading, which corresponds to a 55 percent reduction in construction activities required for excavation. To account for any earthwork needed for foundations, for both the Project and Alternative 2, it is assumed that the overall depth of excavation would be approximately 50 feet in lieu of detailed construction-level geotechnical survey and reporting. The Project would result in a cut and fill balance of approximately 87,000 CY of grading. Alternative 2's reduced excavation depth would reduce the Project's total grading by approximately 55 percent to approximately 39,300 CY. Under both the Project and Alternative 2, earthwork or excavation into native soils (beneath the upper fill soils) have the potential to encounter previously unknown buried paleontological resources. As with the Project, Alternative 2 would implement Mitigation Measures PALEO-MM-1 (retaining a Qualified Paleontologist), PALEO-MM-2 (providing construction worker paleontological resources sensitivity training), and PALEO-MM-3 (providing paleontological monitoring). As with the Project, potentially significant impacts under Alternative 2 would be reduced to a less than significant level with mitigation. However, because construction of Alternative 2 would result in less excavation and ground disturbance than the Project, and thus less likelihood of encountering unanticipated discovery of paleontological resources, impacts to paleontological resources would be less as compared to the Project's less than significant impact (with mitigation).

(f) *Greenhouse Gas Emissions*

Alternative 2 would reduce excavation volumes and, thus, reduce impacts associated with grading as compared to the Project. For Alternative 2, the total excavated soil for export would be reduced from 87,000 CY to 39,300 CY, an approximately 55 percent reduction. Therefore, Alternative 2 would result in a corresponding 55 percent reduction in grading and hauling activity and associated grading GHG emissions. Construction activities under both Alternative 2 and the Project would not conflict with regulations to reduce GHG emissions by complying with CARB vehicle engine efficiency and fuel standard regulations and the anti-idling regulation. Based on the 55 percent reduction in grading and hauling activity and associated grading GHG emissions Alternative 2's overall construction GHG emissions would be less as compared to the Project's less than significant impact.

Alternative 2 would provide the same square footage of the Hotel Expansion Building and Meeting Room Addition and LAMC calculated floor area (299,088 square feet) as the Project. As with the Project, Alternative 2 would provide the same restaurant, spa, lounge, and pool uses (indoor and outdoor spaces). While Alternative 2 would reduce on-site parking compared to the Project, a reduction of the Project's 464 new parking spaces to 360 new spaces (reduction of approximately 22 percent parking), VMT under Alternative

2 and the Project would be the same because the proposed development of hotel, restaurant, pool, landscaping, and other amenity areas would remain the same as under the Project. As such, operational mobile source-related GHG emissions would also be the same as the Project. The reduction of approximately 22 percent parking under Alternative 2 compared to the Project would result in slightly reduced electricity consumption from parking uses and slightly reduced electricity GHG emissions. As with the Project, Alternative 2 would be constructed to LEED Gold Standards, comply with the CALGreen Code's energy saving measures, install high-efficiency appliances, incorporate water-efficient fixtures and water-efficient landscaping and irrigation, such as use of artificial turf, California Friendly® plants, and drip/subsurface irrigation (micro-Irrigation), incorporate water-efficient pool-related features, such as a leak-detection system (refer to Section II, Project Description, of this Draft EIR, for additional details). As with the Project, Alternative 2 would be located within a designated HQTAs and TPAs, with access to regional transportation facilities in the Project Site vicinity, including the Metro B Line (Red Line) Universal City/Studio City Station and Metro bus lines along Lankershim Boulevard in the Project vicinity, which would reduce vehicle trips and VMT for both the Project and Alternative 2. Thus, as with the Project, Alternative 2 would not conflict with the applicable GHG emission reduction plans and policies including CARB's Climate Change Scoping Plan, the 2020–2045 RTP/SCS, the City's Green New Deal, and the Los Angeles Green Building Code. Alternative 2 and the Project would result in similar less than significant operational GHG impacts.

Overall, with reduced grading and soil export during construction having less GHG emissions during construction and slightly less operational GHG emissions from the reduced parking, GHG impacts under Alternative 2 would be less as compared to the Project's less than significant impact.

(g) *Hydrology and Water Quality*

(i) *Water Quality Standards*

(a) *Construction*

Construction activities under Alternative 2 and the Project, such as earth moving, maintenance and operation of construction equipment, potential dewatering, and handling, storage, and disposal of materials, as well as erosion, could contribute to pollutant loading in stormwater runoff from the construction site from inadvertent spills/accidental release which could impact water quality standards. Also, exposed and stockpiled soils under both Alternative 2 and the Project could be subject to wind and conveyance into nearby storm drains during storm events, and on-site watering activities for dust suppression purposes could contribute to pollutant loading in runoff from the construction site thus degrading water quality standards. Alternative 2 and the Project would comply with regulatory requirements, BMPs provided under the required Storm Water Pollution Prevention Plan (SWPPP), and City Building Code grading procedures to ensure that pollutant loading would not exceed water quality standards. Therefore, impacts with respect to construction phase water quality standards under both the Project

and Alternative 2 would be less than significant. However, because Alternative 2 would reduce the quantity of excavated and stockpiled materials to be hauled away by approximately 55 percent, there would be less potential for pollutants to enter into surface water sources or groundwater. As such, Alternative 2 impacts would be less as compared to the Project's less than significant impact.

(b) Operation

The Project Site was developed prior to the enforcement of storm water quality BMP design, implementation, and maintenance. The Project Site currently does not implement structural BMPs for treatment of stormwater runoff. However, there is a range of non-structural BMPs that are currently utilized at the Project Site to minimize the impact of pollutant sources, which would continue under the Project. Source control measures under the City's LID, including good housekeeping, removal of trash and maintenance of driveways and parking areas, proper use and storage of pesticides, and substituting environmentally-friendly products for environmentally-hazardous products, such as soaps, solvents, and pesticides would continue on the Project Site under both Alternative 2 and the Project to reduce surface water quality impacts and prevent pollutants from entering the local groundwater supply by percolation into landscaped areas with permeable surfaces. Under Alternative 2 and the Project, any on-site use of hazardous materials to be used in association with continued operation of the Project, such as small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance, as well as fuel storage associated with an on-site generator, would be continue to be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations such that no hazardous materials be exposed to or otherwise would adversely impact groundwater quality.

Alternative 2 and the Project would implement capture and reuse for managing stormwater runoff in accordance with current LID requirements. The proposed water quality capture and reuse system under both Alternative 2 and the Project would be constructed pursuant to the standards established by LASAN's Watershed Protection Division to ensure the treatment of contaminants without allowing seepage into the underlying soil, as required. The final drainage and treatment system design would be finalized as part of the grading and building permit process under both Alternative 2 and the Project.

With implementation of the capture and reuse system, along with compliance to applicable LID requirements, Alternative 2 and the Project would reduce or eliminate the discharge of potential pollutants from stormwater runoff. Operation of Alternative 2 and the Project would result in a net reduction of pollutants compared to existing conditions because the Project Site currently has no structural BMPs for treatment of stormwater runoff.

Overall, Alternative 2's impacts with respect to surface water quality and groundwater quality during operations would be similar as compared to the Project's less than significant impact.

(ii) *Alteration of Existing Drainage Patterns*

(a) Construction

Construction activities under Alternative 2 and the Project could contribute to erosion or siltation when soils are exposed. Construction activities have the potential to temporarily alter existing drainage patterns and flows within the Project Site by altering topography, exposing the underlying soils, and increasing permeability. However, both Alternative 2 and the Project would be required to implement BMPs and erosion control measures as part of a SWPPP to manage runoff flows. With implementation of construction BMPs as part of a SWPPP and compliance to applicable regulatory requirements, impacts related to drainage pattern changes resulting in erosion, siltation, or runoff water that would exceed the capacity of existing or planned stormwater drainage systems or block or redirect the flow of flood water would be less than significant under both Alternative 2 and the Project. While Alternative 2 would require substantially less excavation, on- and off-site drainage patterns during construction would be similar in terms of impact under Alternative 2, despite the fact that Alternative 2 would convert the North Plaza into a parking garage, as impervious areas would be similar to the Project and as such, impacts would be similar as compared to the Project's less than significant impact.

(b) Operation

Alternative 2, as with the Project, would comply with LID requirements to ensure that stormwater treatment with operational BMPs would control pollutants associated with storm events up to the greater of an 85th percentile storm event or the first 0.75-inch of runoff flow during storm events defined in the City's LID BMPs. Drainage patterns for the Project Site under both Alternative 2 and the Project would be changed because runoff would no longer be entirely discharged to the municipal storm drain system, as it is now. In addition, as part of LID compliance for the Project to manage post-construction stormwater runoff, Alternative 2 and the Project would include the installation of catch basins, planter drains, and building roof drain downspouts throughout the Project Site to collect roof and site runoff and direct stormwater away from structures through a series of underground storm drain pipes. This on-site stormwater conveyance system would serve to prevent onsite flooding and nuisance water on the Project Site. In addition, with implementation of the proposed BMPs, Alternative 2 and the Project would implement a combination of pre-treatment and capture and use systems to collect and store the first flush of stormwater runoff in tanks, and re-use the water for various purposes onsite implemented upon LA Sanitation's approval. As with the Project, the proposed drainage pattern under Alternative 2 would not be substantially different than existing conditions, because any increase in the volume of stormwater runoff generated under Alternative 2 would not be greater than one percent compared to existing conditions. Under Alternative 2 with the on-site stormwater conveyance system, together with the LID BMPs that would

capture and treat the first flush of rainfall, impacts related to drainage patterns would be similar as compared to the Project's less than significant impact.

(iii) *Conflict with a Water Quality Control Plan or Sustainable Groundwater Management Plan*

Alternative 2, similar to the Project, would be a typical in-fill development project without substantial changes to the drainage patterns in the surrounding vicinity. The Project Site is not located within a floodplain or subject to atypical flooding or water quality impacts. Alternative 2 would be required to comply with regulatory measures and would be expected to have a site drainage plan developed pursuant to the City's LID program similar to that of the Project. As discussed above, with the implementation of an on-site drainage system and BMPs accordance with current LID requirements, Alternative 2 and the Project would have less-than-significant impacts on both surface and groundwater quality during construction and operation phases. Further, Alternative 2's above grade parking structure would not result in substantial differences in total impervious surface area compared to that of the Project since the portion of the Project Site proposed for the above-grade parking structure is currently paved with impervious surface and this condition would not change under the Project. As such, Alternative 2's impacts regarding potential conflicts with a Water Quality Control Plan or Sustainable Groundwater Management Plan would be similar as compared to the Project's less than significant impact.

(h) *Land Use and Planning*

The Project and Alternative 2 would have the same new use, the same floor area, and the same FARs of 2.2:1, and would request the same entitlements identified in Chapter II, *Project Description*, of this Draft EIR. As with the Project, Alternative 2 would not conflict with land use plans and policies adopted to eliminate or mitigation significant impacts, including SCAG's 2020-2045 RTP/SCS, the City of Los Angeles General Plan, the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Community Plan, the City of Los Angeles Municipal Code, or the Citywide Design Guidelines. The Project and Alternative 2 would be consistent with the General Plan's Regional Center Commercial land use designation. Overall, as with the Project, Alternative 2 would not result in a substantial conflict with applicable land use plans, policies, or regulations. Land use impacts under Alternative 2 would be similar as compared to the Project's less than significant land use impact.

(i) *Noise and Vibration*

(i) *Noise*

(a) *Construction*

Alternative 2 would eliminate the Project's expansion of the existing parking garage; reduce the Project's 464 new parking spaces to 360 new spaces, a reduction of approximately 22 percent; and locate all new parking in a new 3-story parking garage

over the North Plaza. For Alternative 2, the total soil export would be reduced from 87,000 CY to 39,300 CY, an approximately 55 percent reduction. Alternative 2 would reduce excavation volumes by 55 percent and, thus, correspondingly reduce the duration of impacts associated with excavation, grading, and foundation work by 55 percent as compared to the Project (from approximately 87 days to approximately 40 days based on the corresponding 55 percent reduction in grading quantities). However, the maximum daily noise levels for Alternative 2, the focus of the significance analysis, would be generally similar to the Project, but reduced in duration for the overlapping phases that include the parking garage expansion. Both Alternative 2 and the Project would implement Mitigation Measures NOISE-MM-1 (Noise Barriers) and NOISE-MM-2 (Construction Equipment Noise Shielding and Muffling Devices), as applicable, to reduce on-site construction noise levels in excess of ambient noise standards. As with the Project, impacts would be less than significant at R2, and impacts at receptors R3, R4, and R5 would be reduced to less-than-significant levels with implementation of Mitigation Measure NOISE-MM-2. Even so, with implementation of all feasible mitigation measures, Alternative 2 and the Project's construction noise impacts although temporary, would continue to be significant and unavoidable at the adjacent Sheraton Hotel (R1). Therefore, Alternative 2 and the Project would result in a temporary increase in ambient noise levels that would be significant and unavoidable and maximum daily impacts would be similar. However, as discussed above, because of the reduced duration of overlapping construction activities associated with development of the parking garage, impacts are considered less under Alternative 2 than under the Project.

Off-site construction noise impacts from haul trucks and concrete foundation trucks are discussed separately because as stated in Section IV.I, *Noise*, of this Draft EIR, haul trucks are subject to the City-approved haul truck route as discussed in the section, whereas concrete trucks are not subject to the City-approved haul truck route. Therefore, concrete trucks could travel along a variety of roadway segments and impacts from haul trucks and concrete trucks are discussed separately (see Section IV. I, *Noise*, of this Draft EIR for additional details about the specific routes for both haul trucks and concrete trucks for the Project and Project Alternatives). For the Project, grading and excavation activities for the Hotel Expansion Building and Meeting Room Addition and expansion of the existing parking garage would occur at the same time and would result in a maximum of approximately 70 worker trips and 50 haul truck trips per hour (assuming a maximum of 400 haul truck trips per day evenly distributed over an eight-hour work day). The Project's increase in truck and vehicle trips would increase existing traffic noise levels by a maximum of 3.1 dBA CNEL which would not exceed the noise significance threshold. As stated above, Alternative 2 would eliminate the Project's expansion of the existing parking garage; reduce the Project's 464 new parking spaces to 360 new spaces, a reduction of approximately 22 percent; and locate all new parking in a new three-story parking garage over the North Plaza. The total soil export would be reduced from 87,000 CY to 39,300 CY, an approximately 55 percent reduction. Since Alternative 2 would reduce the number of haul truck trips required to haul excavated material and reduce the number of days with haul truck trips, the duration of off-site roadway noise during the grading/excavation phase would be reduced (from

approximately 87 days to approximately 40 days based on the corresponding 55 percent reduction in grading quantities). Alternative 2 and the Project impacts related to off-site construction traffic noise would be less than significant; however, because of the reduced number of days and truck trips, the duration of impacts would be less under Alternative 2 than under the Project. However, although Alternative 2 would have less impact as compared to the Project, both Alternative 2 and the Project would have a significant and unavoidable impact (with mitigation).

(b) Operations

Alternative 2 would provide the same square footage of the Hotel Expansion Building and Meeting Room Addition and LAMC calculated floor area (299,088 square feet) as the Project. The configuration of the circulation for guest arrival would be similar to the Project. Alternative 2 would provide the same hotel, restaurant, pool, landscaping, and other amenity areas would remain the same as under the Project. However, Alternative 2 would maintain the existing parking garage as is. Alternative 2 would eliminate the Project's expansion of the existing parking garage; reduce the Project's 464 new parking spaces to 360 new spaces, a reduction of approximately 22 percent; and locate all new parking in a new 3-story parking garage on the North Plaza. Like the Project, Alternative 2 would include new mechanical equipment (e.g., air conditioners, fans, and related equipment) which would be located on the Project Site. Project and Alternative 2 mechanical equipment for the Hotel Expansion Building and Meeting Room Addition would be located within a mechanical room on the roof. Mechanical equipment for the Meeting Room Addition would also be located on the roof. Emergency generators would be located within an electrical room within the existing parking garage structure and would not contribute to noise levels due to their enclosed, underground location.

Project and Alternative 2 outdoor mechanical equipment would be designed so as not to increase the existing ambient noise levels by 5 dBA in accordance with the City's Noise Regulations (Section 112.02 of the LAMC). A noise level reduction of 15 dBA would occur from implementation of Project Design Feature NOI-PDF-2 which includes enclosures and other forms of noise attenuation. Similar to the Project, Alternative 2 mechanical equipment noise levels would not result in an exceedance of the threshold for sensitive receptors at the Sheraton Hotel (R1). Receptors located at a further distance from the Project Site would experience even lower noise levels. Additionally, Alternative 2, like the Project, would not result in an increase in ambient noise levels in the Project vicinity and thus, noise impacts from the use of outdoor spaces would be less than significant at receptors R2 through R5. While Alternative 2 would eliminate the Project's expansion of the existing parking garage; reduce the Project's 464 new parking spaces to 360 new spaces, a reduction of approximately 22 percent; and locate all new parking in a new 3-story parking garage over the North Plaza and related trips, the amount of traffic generated with Alternative 2 would be the same on the analyzed roadway segments as compared to the Project. Therefore, similar to the Project, operational traffic noise increases associated with Alternative 2 would be less than significant as described in Section IV. I, *Noise*, of the Draft EIR and shown in Table IV.I-13, *Off-Site Traffic Noise*

Impacts – Future (2027) Plus Project Conditions., As shown therein, the maximum increase in Project-related operational traffic noise levels over existing traffic noise levels would be 0.5 dBA CNEL, which would occur along W.C. Fields Drive between Universal Studios Blvd and Barham Blvd. Alternative 2 would results in the same traffic noise level impacts as the Project. Therefore, as with the Project, Alternative 2 impacts related to on-site composite noise (mechanical equipment, loading dock/refuse collection activity, emergency generator, parking structure noise, and off-site traffic noise) would be less than significant. Therefore, operational traffic noise impacts from Alternative 2 would be similar as compared to the Project's less than significant impacts.

(ii) *Vibration*

(a) *Construction*

Construction activities can generate varying degrees of ground vibration, depending on the construction procedures and the type of construction equipment used. The operation of construction equipment generates vibrations that travel through the ground and diminish in amplitude with distance from the source. Regarding potential building damage, Alternative 2 and the Project would generate groundborne construction vibration forces during building demolition and excavation/grading activities when heavy construction equipment, such as large bulldozers, drill rigs, and loaded trucks, would be used. Per NOI-PDF-3 (Impact Pile Drivers Prohibited), both the Project and Alternative 2 will not require or allow the use of impact pile drivers; however, augured, drilled, or vibratory piles are permitted. Under both the Project and Alternative 2, construction vibration levels would be below the significance threshold of 0.5 inches per second (PPV) at the nearest buildings, the Sheraton parking garage, Sheraton hotel, and existing hotel buildings. Temporary construction-related vibration would not exceed the established threshold for human annoyance at the nearest buildings, the Sheraton hotel, under both Alternative 2 and the Project.

In addition to the on-site construction equipment, heavy-duty construction trucks would generate groundborne vibration as they travel along the Project and Alternative 2's anticipated haul routes. Although the Project and Alternative 2 would not result in significant vibration impacts from construction trucks along haul routes, these impacts would be less under Alternative 2 than the Project. Alternative 2 would eliminate excavation for the parking garage expansion and reduce the Project's grading and export (hauling) of removed soils by approximately 55 percent, thereby reducing the total number of trucks utilizing the haul routes during the grading/excavation phase by approximately 55 percent. As such, the duration of groundborne vibration impacts along these haul routes would be reduced under Alternative 2. Since Alternative 2 would reduce the duration of grading activities and the duration of heavy construction equipment usage by approximately 55 percent, such as large bulldozers and loaded trucks, the duration of vibration impacts for Alternative 2 would be less as compared to the Project's less than significant impact.

(b) Operations

Operation of Alternative 2, like the Project, would include typical commercial-grade stationery mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration. Groundborne vibration generated by the above-mentioned equipment would generate approximately up to 0.005 in/sec PPV adjacent to the Project Site.⁴ Thus, the potential vibration levels from all Alternative 2 operational sources at the closest existing sensitive receptor locations would be less than the significance threshold of 0.5 in/sec PPV for potential Category I building damage. As such, Alternative 2, similar to the Project, would not result in the generation of excessive groundborne vibration, and vibration impacts would be less than significant.

Alternative 2, similar to the Project, would locate mechanical equipment in the underground and/or enclosed locations which would absorb groundborne vibration. Thus, groundborne vibration from the operation of such mechanical equipment would be less than the 0.5-in/sec structural damage threshold and the 72-VdB human annoyance threshold and would not impact any of the off-site vibration sensitive receptors. Therefore, Alternative 2, similar to the Project, would not result in the generation of excessive groundborne vibration, and vibration impacts to any vibration sensitive receptors, including the adjacent Sheraton Hotel, with respect to human annoyance and impacts would be less than significant.

Alternative 2, like the Project, would result in less than significant operational noise and vibration impacts. Therefore, Alternative 2's operational vibration impacts would be similar as compared to the Project's less than significant impact.

(j) *Public Services*

(i) *Fire Protection*

(a) Construction

Construction activities under both the Project and Alternative 2 would potentially increase the demand for or physically impede fire protection and emergency medical services due to the presence of construction equipment and construction staging areas. During construction, the Project and Alternative 2 would implement Project Design Feature TRAF-PDF-2, to provide a City reviewed Construction Management Plan (CMP) to minimize impacts to emergency vehicles during construction. Fire safety during construction would be further addressed by the Federal Occupational Safety and Health Administration (OSHA) safety and health provisions. Neither the Project nor Alternative 2 would increase fire services demand to the extent that the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service as the on-site construction workforce would not be such that it would be required. Therefore, impacts during construction with respect to fire protection under

⁴ This vibration estimate is based on data presented in the USDOT Federal Transit Administration, 2006; which are included in Appendix I of this Draft EIR.

either the Project or Alternative 2 would be less than significant. However, since Alternative 2 would reduce the overall scale of excavation activities by approximately 55 percent, and the duration of construction activities would also be reduced as compared to the Project, Alternative 2's impacts would be less than the Project's less than significant impacts as the construction period would be shortened.

(b) Operation

As with the Project, Alternative 2's estimated employees and visitors would increase demand on fire protection and emergency medical services due to the greater number of employees and visitors than existing. Both the Project and Alternative 2 would comply with all applicable OSHA, Building Code, Fire Code, other LAMC, and LAFD requirements. The Project and Alternative 2 would also meet LAFD recommended fire prevention and protection features including building identification, emergency access lanes, and building setbacks. Additionally, plans and specifications would be submitted to LAFD prior to the provision of necessary permits. Compliance with applicable codes and inclusion of LAFD recommendations, such as incorporation of sprinklers, would result in safe, modern buildings and would reduce demand for LAFD services. Overall, operation of the Project or Alternative 2 would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire station facilities. Therefore, impacts to fire protection and emergency medical services during operation of either the Project or Alternative 2 would be less than significant and similar to the Project's less than significant impact.

(ii) *Police Protection*

(a) Construction

Construction activities under either the Project or Alternative 2 would potentially increase demand for police protection services or physically impede police protection service access on the local roadway network due to the presence of construction equipment and construction staging areas. During construction, both the Project and Alternative 2 would implement Project Design Feature TRAF-PDF-2, a City-reviewed CMP, to ensure that emergency access would be maintained in the vicinity. Both the Project and Alternative 2 would also implement Project Design Feature POL-PDF-1 to limit access to construction areas, including private security, construction fencing, locked entry, and security lighting. With the implementation the CMP pursuant to Project Design Feature TRAF-PDF-1 and the security features of Project Design Feature POL-PDF-1, neither the Project nor Alternative 2 would increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, construction impacts would be less than significant under both the Project and Alternative 2. However, because Alternative 2 would reduce the scale and duration of construction activities, due to the 55 percent reduction in excavation and hauling of exported soils, Alternative 2's impacts would be less as compared to the Project's less than significant impact on police services as the construction period would be shortened.

(b) Operation

The increase in employees and visitors under the Project and Alternative 2 would be the same because of the same uses and floor areas proposed, and would increase the service population to officer ratio in the North Hollywood Community Area. The Project would increase non-residential service population by approximately 198. As Alternative 2 would include the same number of hotel rooms, Alternative 2 would result in the same increase in non-residential service population. With 300 sworn officers, the North Hollywood Community Police Station has an officer-to-population ratio of 1:733. The Project would not develop any residential units or result in an increase in residents. Similar to the Project, Alternative 2 would incrementally increase the non-resident service population by 198 people due to the proposed 395 guest rooms. Thus, no change in the resident to officer ratio or service population would occur between the Project and Alternative 2. In addition, both the Project and Alternative 2 would implement Project Design Feature POL-PDF-2, which would include a security program, such controlled access, camera surveillance, and on-site security personnel that would reduce demand on police services. Accordingly, there would be no need for expanded police facilities to accommodate increased demand. Moreover, LAPD correspondence stated that the Project would not result in the need for new or altered police facilities.⁵ Given no change to the ratio of residents to officers would occur between the Project and Alternative 2, and that both the Project and Alternative 2 would implement Project Design Feature POL-PDF-2, the LAPD's determination would be equally applicable to Alternative 2. Thus, neither the Project nor Alternative 2 would result in substantial adverse physical impacts associated with the provision of a new or physically altered police facility, the construction of which would cause significant environmental impacts. As the service population would be the same under Alternative 2, impacts would be the same as compared the Project's less than significant impact.

(k) *Transportation and Circulation*(i) *Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities*

As with the Project, Alternative 2 would not conflict with the applicable policies of the City's Mobility Plan 2035, Bicycle Parking Ordinance, TDM Ordinance, Central City Community Plan, Vision Zero, Plan for a Healthy Los Angeles, and Citywide Design Guidelines. Consistent with the Mobility Plan 2035, both the Project and Alternative 2 would be pedestrian- oriented and include hotel-related uses and features that support alternative transportation use near transit facilities. The Project and Alternative 2 would support healthy lifestyles by locating jobs adjacent and near transit and providing bicycle parking, and through these measures, would support reductions in VMT. Neither the Project nor Alternative 2 would conflict with programs or policies addressing transit,

⁵ LAPD, Central Division, Officer Alfonso Velasco, letter to Alan Como, Los Angeles Planning Department, May 24, 2022.

roadway, bicycle and pedestrian facilities, transportation impacts. Impacts under Alternative 2 would be similar as compared to the Project's less than significant impact.

(ii) *Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)*

Under Alternative 2, the hotel, restaurant, pool, landscaping, and other amenity areas would remain the same as under the Project. The overall floor area (299,088 square feet) and FAR (2.2:1) would be the same as under the Project. Despite the reduction in parking spaces under Alternative 2, because the Project and Alternative would both provide parking that meets or exceeds the LAMC parking requirement, the VMT would be the same under Alternative 2 and the Project. Impacts regarding VMT under both the Project and Alternative 2 would be consistent with the LADOT's TAG and, thus, consistent with CEQA Guidelines Section 15064.3(b). Therefore, VMT impacts under Alternative 2 would be similar as compared to the Project's less than significant impact.

(iii) *Geometric Design Hazards*

Alternative 2 would result in the same amount of daily trips as the Project as the number of hotel rooms would be the same as with the Project, and thus same number of hotel users. The Project is projected to add 29 or more trips to the US-101 Southbound Off-Ramp at Lankershim Boulevard during the weekly PM peak hour. While queue lengths would be approximately 27 feet during the weekday PM peak hour, this queue length can be accommodated by the existing off-ramp and vehicle queue would not extend on to the mainline. As such, Alternative 2 and the Project would not result in a safety impact. Because Alternative 2 would result in the same number of daily vehicle trips as the Project, Alternative 2 would also not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts would be similar as compared to the Project's less than significant impact.

(I) *Tribal Cultural Resources*

Alternative 2 would not include the existing parking garage expansion and thus, would eliminate the Project's construction activities required for excavation of this component. However, the depth for excavation for other Alternative 2 components would be approximately 50 feet. The Project would result in a cut and fill balance of 87,000 CY of grading. Alternative 2's reduced excavation would reduce the total grading to 39,300 CY, a reduction of approximately 55 percent as compared to the Project. Under both the Project and Alternative 2, excavation into native soils (beneath the upper fills soils) has the potential to encounter previously undiscovered subsurface tribal cultural resources. Both the Project and Alternative 2 would be required to adhere to the City's conditions of approval for the treatment of inadvertent tribal cultural resource discoveries. . With adherence to the City's conditions of approval, construction activities would not cause a substantial adverse impact to tribal cultural resources, and impacts would be less than significant under both the Project and Alternative 2. However, because construction of Alternative 2 would result in less excavation and ground disturbance than the Project, and thus less likelihood of encountering unanticipated discovery of tribal cultural resources,

impacts to tribal cultural resources would be less than the Project's less than significant impacts.

(m) *Utilities and Service Systems*

(i) *Water Supply*

(a) *Construction*

Construction activities under the Project or Alternative 2 would result in an intermittent demand for water, including dust control, cleaning of equipment, removal and re-compaction, and other related activities. Water use for construction of both the Project and Alternative 2 would range from 1,000 to 2,000 gallons per day (gpd) on average for these activities.⁶ The existing water infrastructure has adequate capacity for existing site conditions (estimated to be 9,000 gpd) and, as such, would have adequate capacity for construction activities. New water distribution lines would be constructed onsite, with minor off-site work associated with connections to the public water main. Impacts on water supply and infrastructure during construction would be less than significant under both Alternative 2 and the Project. However, because Alternative 2 would reduce the duration and scale of earthwork, water required for construction activity would be less under Alternative 2 than under the Project as there would be less soil stockpiling, less construction activities and thus a lesser need for water demand. Thus, Alternative 2 impacts would be less as compared to the Project's less than significant impact.

(b) *Operation*

The Project Site currently has adequate fire flow to serve either the Project or Alternative 2 to demonstrate compliance with Section 57.507.3 of the LAMC providing 9,000 gpm from the existing six hydrants closest to the Project Site based on confirmation provided by the Los Angeles Department of Water and Power (LADWP). Both the Project and Alternative 2 would incorporate a fire sprinkler suppression system which can provide 1,250 gpm for the proposed development. Therefore, there is adequate fire flow available to meet the flow required for either the Project or Alternative 2.

Both the Project and Alternative 2 would increase long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. Domestic water demand for the Project, subtracting water conservation features, is estimated to be approximately 112,868 gpd (refer to Table I of the approved WSA, Appendix M-2 of this Draft EIR). In addition, with implementation of WS-PDF-1, the Project's total water demand would be lowered to approximately 78,764 gpd. As Alternative 2 would result in the same operational uses as the Project, Alternative 2 would generate the same water demand as the Project. The approved WSA for the Project demonstrates that LADWP has sufficient water supplies to meet the demand of the Project. As Alternative 2 would result in the same water demand as the Project, impacts

⁶ KPFF Consulting Engineers, *Infrastructure Report*, p. 26, June 2023.

to water supply under Alternative 2 would be similar as compared to the Project's less than significant impact.

(ii) *Wastewater*

(a) *Construction*

During construction of either the Project or Alternative 2, a negligible amount of wastewater would be produced by construction workers because it is anticipated that portable toilets that would dispose of the wastewater off-site would be provided. As with the Project, construction of Alternative 2 would include the construction of all necessary on- and off-site sewer pipe improvements and connections to adequately connect to the City's existing sewer system. Construction of the wastewater system would occur onsite and in the immediate vicinity. All construction impacts would be temporary and would cease once the installation is complete. Due to the 55 percent reduced excavation, Alternative 2 would result in a shorter construction duration and therefore, less wastewater generated during construction. Alternative 2's construction activity would not require or result in the relocation or construction of new or expanded wastewater treatment facilities. Alternative 2's impacts related to wastewater infrastructure and treatment capacity during construction would be less as compared to the Project's less than significant impact.

(b) *Operation*

Wastewater generation for the Project was estimated at 171,645 gpd (see Table IV.M.2-3, *Estimated Proposed Wastewater Generation Increase*, in Section IV.M.2, *Wastewater*, of this Draft EIR). As Alternative 2 includes the same operational uses as the Project, the estimated wastewater generation would be the same.

Since the sewer main lines serving the Project Site have adequate capacity to accommodate the Project, they would also have adequate capacity to accommodate Alternative 2 which would also be served by the existing sewer main lines. Future detailed gauging and evaluation will be needed as part of the standard permit process to identify a specific sewer connection point and confirm the sewer capacity near the time of Project or Alternative 2 development. Although not anticipated, if the public sewer lacks sufficient capacity, then the Project or Alternative 2 would be required to upgrade sewer lines to a point in the sewer system with sufficient capacity. Ultimately, sewage flow under the Project or Alternative 2 would be conveyed to the Hyperion Water Reclamation Plant (HWRP), which has sufficient capacity for the Project and Alternative 2. Sewage flows under the Project or Alternative 2 would represent only a small fraction of the remaining available capacity of 175 mgd at the HWRP. As with the Project, Alternative 2 would not require or result in the relocation or construction of new or expanded wastewater treatment facilities and impacts on wastewater infrastructure and treatment capacity would be less than significant. Alternative 2 would have the same wastewater generation compared to the Project, and therefore, Alternative 2's impacts would be the same as compared to the Project's less than significant impacts.

(3) Comparison of Impacts

As evaluated above and shown in Table V-2 on page V-8, 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.

(4) Relationship of the Alternative to Project Objectives

Alternative 2 would include a similar amount of overall development (same 2.2:1 FAR) and same operational uses at the Project Site as the Project. Overall, there would be 104 fewer parking spaces under Alternative 2 compared to the Project, which would reduce the excavation required for the parking garage expansion by 47,700 CY.

Alternative 2 would fully meet the following Project Objectives:

Objective 1: Expand hotel capacity and local employment opportunity through infill development on a parcel located within close proximity to tourist destinations, entertainment-related uses, and transit centers, thereby promoting local, regional, and state land use and mobility objectives, enabling visitors to use alternate modes of transportation (e.g., walking, bicycling, transit), and reducing vehicle miles traveled.

Objective 3: Preserve views to and from the Hollywood Hills by developing a hotel building that is compatible with the height and massing of nearby high-rise buildings while aligning the building in a way that preserves existing view corridors from public viewing areas.

Objective 4: Provide efficient and convenient site access for all modes of transportation, and enhance pedestrian circulation and bicycle amenities.

Objective 5: Strengthen the economic vitality of the local area by expanding employment opportunities and visitor-serving uses through construction and operation of an infill project within a TPA on a site that is served by existing infrastructure and would generate additional annual tax revenues to the City, including sales taxes and transient occupancy taxes.

Objective 6: Support the City's commitment to green building design, conservation, recycling, and sustainability through sustainable design and construction that promotes resource conservation, including waste reduction, efficient water management techniques, and conservation of energy.

Since Alternative 2 would develop a parking structure over the North Plaza rather than expanding the existing parking structure, Alternative 2 would partially meet the following Project Objectives.

Objective 2: Maximize the usefulness of the Project Site by redeveloping underutilized portions of the property and upgrading other areas of the Project Site with an economically viable designed project with comprehensive ground-level

landscape and entry upgrades and a new hotel building with guestrooms, spa and meeting rooms, and restaurants to support anticipated market demand.

c) **Alternative 3: Office Use Alternative**

(1) Description of the 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. **Figure V-3, Alternative 3 – Conceptual Site Plan**, and **Figure V-4, Alternative 3 – Axonometric View**, illustrate Alternative 3's ground level plan and the vertical projection of the proposed buildings to compare building height, respectively. 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.

Alternative 3's office floor area is anticipated to generate approximately 503 new employees as compared to 321 full-time equivalent (FTE) new employees under the Project.⁷ Unlike the Project, Alternative 3 would not provide any restaurant, spa, meeting room, or hotel uses and would not generate any new restaurant or hotel employees and would not generate any new visitors or guests to the Existing Hotel Building.

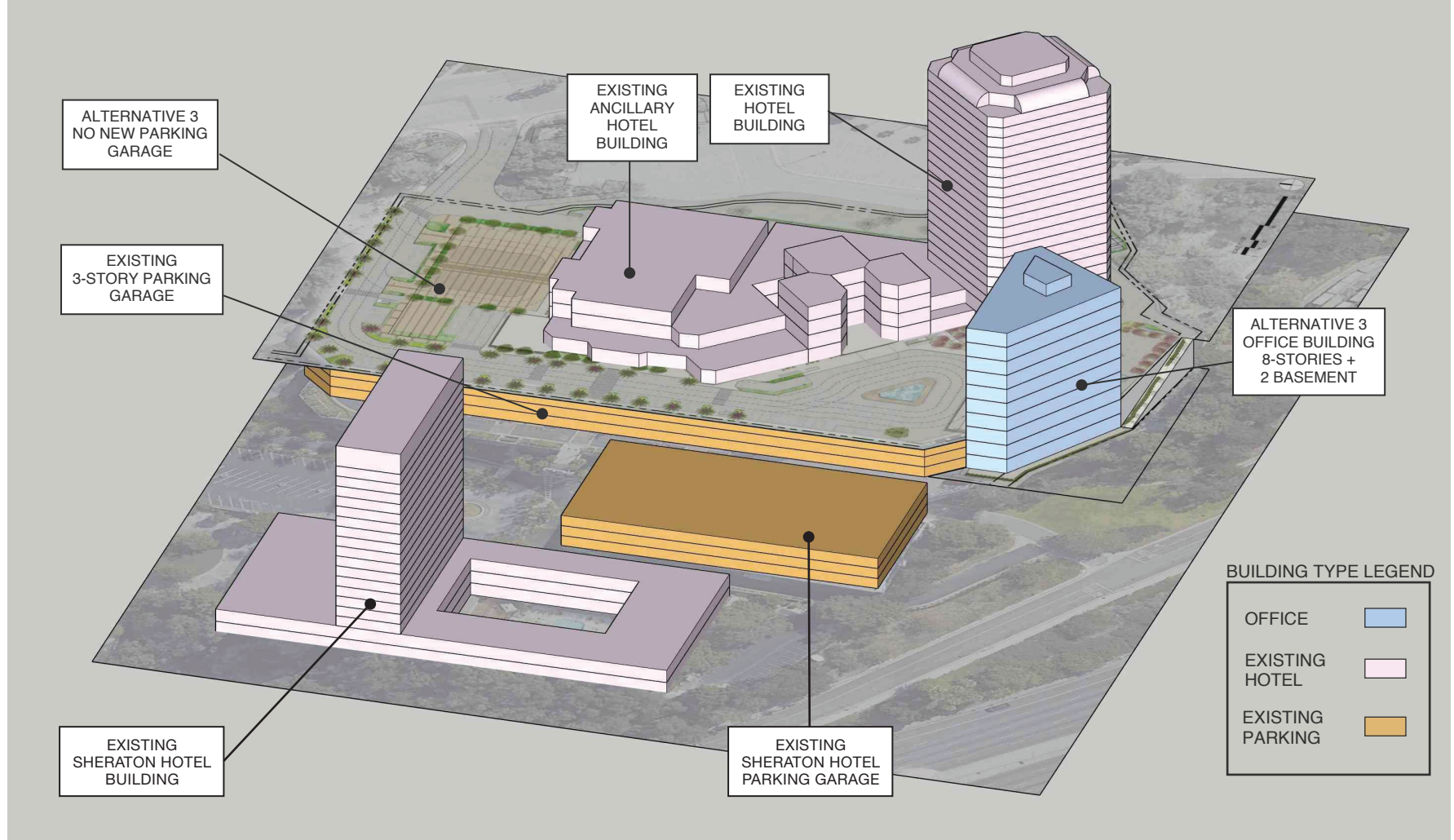
⁷ Alternative 3's 105,000 sf of offices is estimated to generate 503 employees or one employee per 208 sf of office floor area. Full-time employees anticipated for Alternative 3 are generated using the Los Angeles Unified School District 2022 Developer Fee Justification Study, which utilizes 0.00479 employees per average square foot for the category of "Standard Commercial Office" that applies to Alternative 3.



SOURCE: Ankrom Moisan Architects, Inc., 2023

Hilton Universal City Project

Figure V-3
Alternative 3 – Conceptual Site Plan



SOURCE: Ankrom Moisan Architects, Inc., SALT Landscape Architects, 2023

Hilton Universal City Project

Figure V-4
Alternative 3 – Axonometric View

(2) Environmental Impacts

(a) Air Quality

(i) Consistency with Air Quality Management Plan

(a) Construction

The 2022 AQMP includes growth projections in its assessment for achieving air quality goals based on assumptions in the SCAG 2020–2045 RTP/SCS regarding population, housing, and employment growth trends. Similar to the Project, Alternative 3 would result in an increase in short-term employment during construction; however, Alternative 3 would include a smaller amount of overall development and would result in fewer construction jobs compared to the Project. Like the Project, construction jobs under Alternative 3 would be and temporary in nature and last through the completion of construction activities and not generate long-term increases in employment growth. As such, construction jobs would not conflict with the long-term employment projections upon which the AQMP is based.

Like the Project, construction of Alternative 3 would be required to comply with CARB's requirements to reduce short-term emissions from on-road and off-road diesel equipment, and with SCAQMD's regulations, such as Rule 403 for controlling fugitive dust and Rule 1113 for controlling VOC emissions from architectural coatings. Also, like the Project, Alternative 2 would be required to utilize construction contractors in compliance with State on-road and off-road vehicle rules, including the ATCM that limits heavy-duty diesel motor vehicle idling to five minutes at any location (Title 13 CCR, Section 2485), the Truck and Bus regulation that reduces NO_x, PM₁₀, and PM_{2.5} emissions from existing diesel vehicles operating in California (13 CCR, Section 2025), and the In-Use Off-Road Diesel Fueled Fleets regulation that reduces emissions by the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission controlled models (13 CCR, Section 2449). As such, Alternative 3 would not conflict with implementation of these strategies. Compliance with these requirements under Alternative 3 is consistent with and meets or exceeds the AQMP control strategies.

Under Alternative 3, the southern portion of the Project Site would be developed with an 8-story office building totaling approximately 105,000 square feet as compared to the Project that would develop an 18-story, approximately 299,088 -square-foot Hotel Expansion Building and Meeting Room Addition, which is an approximately 65 percent reduction in building square footage. Alternative 3 would also reduce the parking on the North and South Plazas by 54 percent from 464 new spaces under the Project to 215 spaces under Alternative 3. Alternative 3 would reduce the Project's 2.2:1 FAR to 1.6:1. Alternative 3 would reduce the Project's total soil export from 87,000 CY to 17,800 CY, a reduction of approximately 80 percent. Thus, Alternative 3 would reduce total construction-related emissions of NO_x, resulting primarily from reduced building construction duration and reduced heavy-duty trucks required for on-road soil hauling. Alternative 3 would reduce the number of days with building and parking construction

activities on the North and South Plazas by approximately 65 percent and 54 percent, respectively (from approximately 582 days to approximately 228 days based on the floor area reduction and overlapping building construction schedule for the Hotel Expansion Building and Meeting Room Addition and parking garage), but could still exceed the SCAQMD daily thresholds of significance because daily activities levels would be similar. Since Alternative 3 would reduce the total number of haul truck trips required to export soil and reduce the number of days with haul truck trips, the duration of emissions during the grading phase would also be reduced by approximately 80 percent (from approximately 87 days to approximately 18 days based on the corresponding 80 percent reduction in grading quantities) but could still exceed the SCAQMD daily thresholds of significance because daily activities levels would be similar. Implementation of Mitigation Measure MM AQ-1 (Construction Equipment Features) would reduce the Project's and Alternative 3's construction emissions of NO_x to below the significance threshold, and regional air quality impacts would be reduced to less than significant. Therefore, similar to the Project, construction activities under Alternative 3 would not conflict with or obstruct implementation of the AQMP, and impacts would be less than significant. However, because Alternative 3 would reduce the scale and duration of excavation activities by approximately 80 percent and building and parking construction activities by approximately 65 percent and 54 percent respectively, Alternative 3 would result in reduced total emissions and result in less delay in the timely attainment of air quality standards specified in the AQMP. Therefore, the duration of impacts related to consistency with the AQMP would be less under Alternative 3 than under the Project, but both Alternative 3 and the Project would have a less than significant impact (with mitigation)

(b) Operation

Alternative 3 would retain the Project Site's existing hotel use, but the southern portion of the Project Site would not be redeveloped with additional hotel uses and the Existing Outdoor Pool Area would be maintained in its current condition. However, Alternative 3 would develop an office building on the southern portion of the site adjacent to the Existing Outdoor Pool Area. In addition, the existing parking garage would remain the same as under existing conditions, and all new parking for the office building would be surface level. As with the Project, Alternative 3 would be consistent with the goals of SCAG's 2016-2040 and 2020-2045 RTP/SCS and growth projections in the 2016 and 2022 AQMP, since the growth would occur in a HQTa and a TPA. Alternative 3 would also be consistent with applicable goals, objectives, and policies of the Air Quality Element of the General Plan (Air Quality Element) that support and encourage transportation efficiency as the Project Site is located within a designated HQTa and TPA, with access to regional transportation facilities in the Project Site vicinity, including the Metro B Line (Red Line) Universal City/Studio City Station and Metro bus lines along Lankershim Boulevard in the Project vicinity, which would reduce vehicle trips and VMT for both Alternative 3 and the Project. As such, both Alternative 3 and the Project would be consistent with the Air Quality Element and would not obstruct implementation of the AQMP. The reduction in daily VMT (see VMT discussion under Transportation below) under Alternative 3 would

support the policies of the Air Quality Element and the AQMP and impacts from Alternative 3 would be less than the Project's less than significant impact (with mitigation).

(ii) *Cumulatively Considerable Increase in Criteria Pollutants*

(a) Construction

As with the Project, Alternative 3's construction activities have the potential to generate temporary regional criteria pollutant emissions VOC, NO_x, and CO through the use of construction equipment, vehicle trips generated by workers, and haul trucks traveling to and from the Project Site. Construction-related daily emissions of VOC, under both Alternative 3 and the Project, would exceed the SCAQMD thresholds of significance. Alternative 3 would reduce construction-related emissions of NO_x, resulting primarily from heavy-duty trucks required for on-road soil hauling. Alternative 3 would eliminate the Project's expansion of the existing parking garage and parking would be reduced from 464 new spaces to 215 new spaces, an approximately 54 percent reduction compared to the Project. The southern portion of the Project Site would be developed with an 8-story office building totaling approximately 105,000 square feet, which is an approximately 65 percent reduction in building square footage. Alternative 3 would reduce the Project's total soil export from 87,000 CY to 17,800 CY, an approximately 80 percent reduction. Alternative 3 would reduce the number of days with building and parking construction activities on the North and South Plazas by approximately 65 percent and 54 percent, respectively (from approximately 582 days to approximately 228 days based on the floor area reduction and overlapping building construction schedule for the Hotel Expansion Building and Meeting Room Addition and parking garage), but could still exceed the SCAQMD daily thresholds of significance because daily activities levels would be similar. Alternative 3 would reduce the number of days with haul truck trips by approximately 80 percent (from approximately 87 days to approximately 18 days based on the corresponding 80 percent reduction in grading quantities) but could still exceed the SCAQMD daily thresholds of significance because daily activities levels would be similar. With implementation of Mitigation Measures AQ-MM-1, emissions would be reduced to below the SCAQMD's daily significance thresholds for both Alternative 3 and the Project. In addition, because Alternative 3 would substantially reduce grading activities and hauling, it would contribute fewer days of grading emissions and fewer days of overlapping construction emissions than the Project. Therefore, the duration of construction emission impacts would be less as compared to the Project's less than significant impact (with mitigation).

(b) Operations

During operation, Alternative 3, would generate emissions associated with vehicle trips, heating, lighting, other electric and natural gas power requirements, emergency generators, and architectural coatings. Alternative 3 would retain the Project Site's existing hotel use, but the southern portion of the Project Site would not be redeveloped with additional hotel uses and the Existing Outdoor Pool Area would be maintained in its

current condition. Alternative 3 would eliminate the Project's expansion of the existing parking garage and parking would be reduced from 464 new spaces to 215 new spaces, an approximately 54 percent reduction compared to the Project. Alternative 3 would develop the southern portion of the Project Site with an 8-story office building totaling approximately 105,000 square feet instead of developing 18-story, approximately 299,088-square-foot Hotel Expansion Building and Meeting Room Addition, reducing overall floor area of development by approximately 65 percent. Although the hotel rooms would not be expanded under Alternative 3, the office building use would generate fewer daily trips and a lower daily VMT than the Project. Alternative 3 would reduce the Project's daily VMT from 29,995 to 6,902 (refer to Section V.6.(c)(2)(k), Transportation). With the reduction of overall floor area of development by approximately 65 percent and reduced VMT, the operational emissions of Alternative 3 would be reduced compared to the Project. Thus, as with the Project, operational emissions under Alternative 3 would be below the SCAQMD significance thresholds. However, because Alternative 3 would reduce overall floor area of development compared to the Project and reduce daily VMT, impacts related to criteria pollutants would be less as compared to the Project's less than significant impact.

(iii) Exposure of Sensitive Receptors to Pollutant Concentrations –Localized Emissions

(a) Construction

Alternative 3, which would reduce overall floor area of development by approximately 65 percent and eliminate excavation for the parking garage and reduce the number of new parking spaces from 464 new spaces to 215 new spaces, an approximately 54 percent reduction compared to the Project, would reduce the Project's grading and export (hauling) of removed soils by approximately 80 percent. Unlike regional emissions, localized emissions are specific to sensitive receptors in the local project area. Under Alternative 3, maximum daily localized emissions would be similar to the Project since daily construction activities levels would be similar to the Project. Thus, as with the Project, Alternative 3 and the Project's maximum daily localized emissions from construction would not exceed the SCAQMD localized significance thresholds for NOx, CO, PM10, and PM2.5. With the approximately 65 percent and 54 percent reduction in building and parking construction activities, respectively, the duration of building and parking construction activities would be reduced (from approximately 582 days to approximately 228 days based on the floor area reduction and overlapping building construction schedule for the Hotel Expansion Building and Meeting Room Addition and parking garage). With the approximately 80 percent reduction in grading activities under Alternative 3, the duration of grading related emissions would be shortened under Alternative 3 by approximately 80 percent (from approximately 87 days to approximately 18 days based on the corresponding 80 percent reduction in grading quantities). Thus, Alternative 3's impacts related to exposure of sensitive receptors to localized pollutant concentrations would be less as compared to the Project's less than significant impact.

(b) Operations

Alternative 3 would develop the southern portion of the Project Site with an 8-story office building totaling approximately 105,000 square feet instead of developing 18-story, approximately 299,088-square-foot Hotel Expansion Building and Meeting Room Addition, reducing overall floor area of development by approximately 65 percent as compared to the Project. The Project's daily localized emissions of NO_x, PM₁₀, and PM_{2.5} related to energy use, emergency generators, charbroilers, and use of coatings, consumer products would be lower than the SCAQMD's significance thresholds and impacts would be less than significant. The overall building floor area would be substantially reduced under Alternative 3 compared to the Project. Based on the reduced building floor area, Alternative 3 would have lower localized operational emissions from consumer products, architectural coatings and energy sources as compared to the Project. In addition, Alternative 3 would not provide any restaurant uses, thus charbroiler emissions would not occur under Alternative 3 as compared to the Project. Thus, impacts related to exposure of sensitive receptors to localized concentration of pollutants under Alternative 3 would be less as compared to the Project's less than significant impact.

(iv) Carbon Monoxide Hotspots

As discussed under Transportation below, Alternative 3 would generate fewer daily trips and have a lower daily VMT compared to the Project. Alternative 3 would reduce the Project's daily vehicle trips from 4,309 to 905 with similar TDM measures as the Project, and as a result, would reduce the Project's daily VMT from 29,995 to 6,902 (refer to Section V.6.(c)(2)(k), Transportation). The most heavily impacted intersection in the Project Site area with the potential to result in CO hotspots is Barham Boulevard and Cahuenga Boulevard. During operation, CO concentrations from the Project's maximum operational traffic volume at this intersection plus the measured background level in the Project Site area are expected to be approximately 4.5 parts per million (ppm) (one-hour average) and 3.3 ppm (eight-hour average). These levels would not exceed the numerical thresholds of significance and Project impacts related to CO hotspots would be less than significant. Therefore, because Alternative 3 would result in lower traffic volumes than the Project, impacts related to CO hotspots would be less as compared to the Project's less than significant impact.

(v) Toxic Air Contaminants

(a) Construction

Alternative 3 would develop the southern portion of the Project Site with an 8-story office building totaling approximately 105,000 square feet instead of developing 18-story, approximately 299,088-square-foot Hotel Expansion Building and Meeting Room Addition, reducing overall floor area of development by approximately 65 percent as compared to the Project. Alternative 3 would eliminate the Project's expansion of the existing parking garage and parking would be reduced from 464 new spaces to 215 new spaces, an approximately 54 percent reduction compared to the Project. Alternative 3 would also eliminate construction activities associated with excavation, grading, and

foundation work for the parking garage expansion and reduce the Project's total soil export from 87,000 CY to 17,800 CY, an approximately 80 percent reduction.

Under Alternative 3, maximum daily emissions would be similar to the Project since daily construction activities levels would be similar to the Project. Alternative 3 would reduce the number of days of construction compared to the Project. With the approximately 65 percent and 54 percent reduction in building and parking construction activities, respectively, the duration of building and parking construction activities would be reduced (from approximately 582 days to approximately 228 days based on the floor area reduction and overlapping building construction schedule for the Hotel Expansion Building and Meeting Room Addition and parking garage). With the approximately 80 percent reduction in grading activities under Alternative 3, the duration of grading related emissions would be shortened under Alternative 3 by approximately 80 percent (from approximately 87 days to approximately 18 days based on the corresponding 80 percent reduction in grading quantities).

Under both Alternative 3 and the Project, TAC emissions associated with DPM emissions from heavy construction equipment would occur during the construction phase. The Project would comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location and the CARB In-Use Off-Road Diesel Vehicle Regulation. Compliance with these CARB regulations would minimize emissions of TACs during construction. Hazardous materials present in the existing on-site structures or infrastructure, such as asbestos-containing materials or lead based paint, could be exposed during demolition. If present, the hazardous materials are required to be managed and disposed of in accordance with applicable laws and regulations. Further, the Project would implement Mitigation Measure AQ-MM-1 (Construction Equipment Features) would provide the co-benefits of reducing TAC emissions of PM10 and PM2.5 from heavy-duty diesel construction equipment emissions. Project impacts related to construction TAC emissions would be less than significant. Like the Project, Alternative 2 would also comply with the CARB rules and regulations and would also implement Mitigation Measure AQ-MM-1. Thus, like the Project, construction TAC impacts for Alternative 3 would be less than significant. Because Alternative 3 would reduce the duration of the overall construction program, excavation activities, the use of heavy equipment (loaders, excavators), and haul truck activity, Alternative 3 would result in fewer total TAC emissions. As such, TAC impacts under Alternative 3 would be less as compared to the Project's less than significant impact.

(b) Operation

Alternative 3 would develop the southern portion of the Project Site with an 8-story office building totaling approximately 105,000 square feet instead of developing 18-story, approximately 299,088-square-foot Hotel Expansion Building and Meeting Room Addition, reducing overall floor area of development by approximately 65 percent as compared to the Project. As discussed under Transportation below, Alternative 3 would generate fewer daily trips and have a lower daily VMT compared to the Project.

Alternative 3 would reduce the Project's daily vehicle trips from 4,309 to 905 with similar TDM measures as the Project, and as a result, would reduce the Project's daily VMT from 29,995 to 6,902 (refer to Section V.6.(c)(2)(k), Transportation). Alternative 3, as with the Project, would generate emissions from architectural coatings, truck deliveries, and emergency generators. Delivery trucks are required to comply with the applicable provisions of 13 CCR, Section 2025 to minimize and reduce PM₁₀, PM_{2.5}, and NO_x emissions. Any emergency generators for either Alternative 3 or the Project would be certified to the most stringent CARB and SCAQMD Rule 1470 standards to reduce emissions to the lowest technically feasible level. In addition, Alternative 3 would not provide any restaurant uses, and thus, charbroiler emissions would not occur under Alternative 3 as compared to the Project. With existing regulations, operation of either Alternative 3 or the Project would not be considered a substantial source of DPM or other TAC emissions. Impacts under Alternative 3 would be less as compared to the Project's less than significant impacts.

(b) Biological Resources

(i) Candidate, Sensitive, or Special-Status Species

As with the Project, Alternative 3 would require ground disturbance, tree removal, and habitat disturbance that would directly or indirectly impact candidate, sensitive, or special-status species. The Project and Alternative 3 would implement Mitigation Measure BIO-MM-1 (Special-Status Bat Species). With mitigation, construction of the Project and Alternative 3 would result in less than significant impacts. As Alternative 3 would require less tree removal by maintaining the Existing Outdoor Pool Area, Alternative 3's impacts to candidate, sensitive, or special-status species would be less as compared to the Project's less than significant impact (after mitigation).

(ii) Wildlife Movement and Corridors or Wildlife Nursery Sites

Alternative 3 would result in construction and new developed urban uses on the Project Site as the Project, which would not impact wildlife movement or corridors. The Project Site is in an urbanized area and the Project and Alternative 3 would not result in changes during construction or operation that would impact movement of native wildlife species. Alternative 3's impacts to wildlife corridors would be similar as compared to the Project's less than significant impact.

Alternative 3 would result in construction and new developed urban uses on the Project Site as the Project that have the potential to impact wildlife nursery sites. The Project Site contains palms that provide roosting habitat for special-status bat species and other trees and vegetation that provide nesting habitat for birds. The Project and Alternative 3 would implement Mitigation Measure BIO-MM-1 (Special-Status Bat Species) and would comply with regulations such as the MBTA and CFGC. As Alternative 3 would require less tree removal by maintaining the Existing Outdoor Pool Area, Alternative 3's impacts would be less as compared to the Project's less than significant impact (with mitigation).

(iii) *Conflict with Policies or Ordinances Protecting Biological Resources*

Alternative 3 would result in construction and new developed urban uses on the Project Site as the Project that would not conflict with policies or ordinances protecting biological resources. The Project and Alternative 3 would require removal of trees on the Project Site and would be subject to the tree replacement requirements pursuant to the Department of City Planning and/or the City's Urban Forestry Division. The Project and Alternative 3 would result in a less than significant impact related to policies and ordinances protecting biological resources. As Alternative 3 would require less tree removal by maintaining the Existing Outdoor Pool Area, Alternative 3's impacts would be less as compared to the Project's less than significant impact.

(c) *Cultural Resources*

(i) *Historical Resources*

As with the Project, Alternative 3 would develop a portion of the existing Hilton Universal City Hotel site adjacent to the potential Universal Studios Historic District. However, as the Hilton Universal City Hotel does not qualify as a historic resource no direct impacts to historic resources would occur. In addition, due to the distance of the Project Site from the potential Universal Studios Historic District and other historic resources and the nature of the proposed development, no indirect impacts to surrounding historic resources would occur. Therefore, Alternative 3's impacts on historical resources would be similar as compared to the Project's less than significant impact.

(ii) *Archaeological Resources*

Under Alternative 3, as with the Project, grading and excavation into native soils would be necessary to for building foundations. However, excavation would be decreased by approximately 80 percent relative to that required for the Project in terms of overall grading quantities, as Alternative 3 would no longer require excavations necessary to expand the existing parking garage or removal of the Existing Outdoor Pool Area. Alternative 3 would also be subject to the City's standard condition of approval to address inadvertent discovery of archaeological resources, although with less excavation requirements, the risk of encountering an unanticipated discovery is diminished and would result in less than significant impacts to archaeological resources. Because Alternative 3 would result in less excavation and ground disturbance than the Project, Alternative 3's impacts related to archaeological resources would be less as compared to the Project's less than significant impact.

(d) *Energy*

(i) *Construction*

As with the Project, construction of Alternative 3 would result in construction energy consumption primarily from transportation fuels (e.g., diesel and gasoline) used for haul

trucks, heavy-duty construction equipment, and construction workers traveling to and from the Project Site. Alternative 3 would develop the southern portion of the Project Site with an 8-story office building totaling approximately 105,000 square feet instead of developing 18-story, approximately 299,088-square-foot Hotel Expansion Building and Meeting Room Addition, reducing overall floor area of development by approximately 65 percent as compared to the Project. Alternative 3 would eliminate the Project's expansion of the existing parking garage and parking would be reduced from 464 new spaces to 215 new spaces, an approximately 54 percent reduction compared to the Project. Alternative 3 would also eliminate construction activities associated with excavation, grading, and foundation work for the parking garage expansion and reduce the Project's total soil export from 87,000 CY to 17,800 CY, an approximately 80 percent reduction.

Neither the Project nor Alternative 3 are expected to consume natural gas during construction but would use electricity for an on-site office as well as gasoline and diesel fuels associated with on- and off-road construction vehicles. The Project's estimated annual energy demand during construction would be 42,011 kWh of electricity, 41,292 gallons of gasoline, and 168,147 gallons of diesel (see Table IV.D-3 in Section IV.D, *Energy*, of this Draft EIR). The Project's demand for electricity, diesel, and gasoline would be within the handling capacity of suppliers. Construction would utilize energy only for necessary on-site activities and to transport construction materials and demolition debris to and from the Project Site. Alternative 3 would have reduced annual energy demand during construction compared to the Project for electricity, gasoline, and diesel due to the reduced haul truck trips and reduced construction durations. Thus, like the Project, Alternative 3's demand for electricity, diesel, and gasoline would be within the handling capacity of suppliers and construction would utilize energy only for necessary on-site activities and to transport construction materials and demolition debris to and from the Project Site. Neither Alternative 3 nor the Project would not increase demand for electricity, diesel, or gasoline that would exceed available supply or distribution infrastructure capabilities or result in the construction of new energy facilities or expansion of existing facilities and would not result in the wasteful, inefficient, and unnecessary consumption of energy. As such, similar to the Project, energy impacts would be less than significant. In addition, under Alternative 3, the decrease in the overall construction program due the reduction of overall development floor area by 65 percent and the decrease in grading under Alternative 3 would reduce the overall use of heavy equipment, such as loaders, graders, and haul trucks and worker trips which would result in a reduction in diesel and gasoline fuel use. On balance, Alternative 3 would result in less energy demand during construction than the Project. Impacts to energy supplies under Alternative 3 would be less as compared to the Project's less than significant impact.

(ii) Operation

Alternative 3 would retain the Project Site's existing hotel use, but the southern portion of the Project Site would not be redeveloped with additional hotel uses and the Existing Outdoor Pool Area would be maintained in its current condition. Alternative 3 would develop an office building on the southern portion of the site adjacent to the Existing

Outdoor Pool Area. In addition, the existing parking garage would remain the same as under existing conditions, and all new parking for the office building would be surface level. Alternative 3 would eliminate the Project's expansion of the existing parking garage and parking would be reduced from 464 new spaces to 215 new spaces, an approximately 54 percent reduction compared to the Project. Total new square footage under Alternative 3 would be 105,000 square feet versus 299,088 square feet for the Project, a reduction of 65 percent of building floor area of development. Thus, building energy requirements (electricity and natural gas) would be less under Alternative 3 than the Project. As discussed under Transportation below, Alternative 3 would generate fewer daily trips and have a lower daily VMT compared to the Project. As discussed under Transportation below, Alternative 3 would generate fewer daily trips and have a lower daily VMT compared to the Project. Alternative 3 would reduce the Project's daily vehicle trips from 4,309 to 905 with similar TDM measures as the Project, and as a result, would reduce the Project's daily VMT from 29,995 to 6,902 (refer to Section V.6.(c)(2)(k), Transportation). Therefore, Alternative 3 would have a lower demand for gasoline and diesel compared to the Project. Demand under either Alternative 3 or the Project would be within the handling capacity of suppliers.

Operation of both the Project and Alternative 3 would comply with the CALGreen Code's energy saving measures. In addition, Alternative 3 and the Project would comply with utilize other energy-saving measures to achieve a minimum including LEED Gold Certification and may include, but are not limited to, the use of materials and finishes that emit low quantities of volatile organic compounds (VOCs); the installation of HVAC systems that utilize ozone-friendly refrigerants; 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 LAMC requirements. The Project would also utilize the recycling program and facilities that are currently located in the Existing Hotel Building (see Section II, Project Description, for additional details). In addition, the Project would incorporate 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 (refer to Section II, Project Description, of this Draft EIR, for additional details). The Project's water conservation features are included as Project Design Feature WS-PDF-1 (refer to Project Design Feature WS-PDF-1 (Water Conservation Features) in Section IV.M.2, Utilities and Service Systems – Water Supply, of this Draft EIR). The Project and Alternative 3 would be located within a designated HQT and TPA, with access to regional transportation facilities in the Project Site vicinity, including the Metro B Line (Red Line) Universal City/Studio City Station and Metro bus lines along Lankershim Boulevard in the Project vicinity, which would reduce vehicle trips and VMT for both the Project and Alternative 3. However, because of the 65 percent reduction of building floor area of development and lower daily VMT under Alternative 3, impacts on overall energy demand would be less under Alternative 3 as compared to the Project's less than significant impact.

(e) *Geology and Soils*

(i) *Geologic, Seismic, and Soil Hazards*

Under Alternative 3, parking would be provided on the surface level along the circulation roads and within the North and South Plazas, which would require less excavation compared to the Project, which would expand the existing parking garage. Alternative 3 would also require 80 percent less excavation as the Existing Outdoor Pool Area would remain and the office building would also require shallower depth of foundations compared to the Project as it would require a considerably smaller footprint. However, both Alternative 3 and the Project would be developed in accordance with site-specific design recommendations in a Final Geotechnical Report and comply with all applicable regulatory requirements related to building design and safety. There would be a similar level of impact associated with geologic, seismic and soil hazards under Alternative 3 as the same geologic and seismic features and soils would be present as with the Project. Therefore, Alternative 3's impacts related to geology and soils would be similar as compared to the Project's less than significant impact.

(ii) *Paleontological Resources*

Alternative 3 would not include the expansion of existing parking garage or removal of the Existing Outdoor Pool Area and would, thus, reduce the Project's construction activities required for excavation. To account for any earthwork needed for foundations, in lieu of detailed construction-level geotechnical survey and reporting, it is assumed that the overall depth of excavation would be approximately 50 feet. The Project would result in a cut and fill balance of 87,000 CY of grading. Alternative 3's reduced excavation depth would reduce the Project's total grading by approximately 80 percent to approximately 17,800 CY. Under both the Project and Alternative 3, earthwork or excavation into native soils (beneath the upper fill soils) have the potential to encounter previously unknown buried paleontological resources. As with the Project, Alternative 3 would implement Mitigation Measures PALEO-MM-1 (retaining a Qualified Paleontologist), PALEO-MM-2 (providing construction worker paleontological resources sensitivity training), and PALEO-MM-3 (providing paleontological monitoring). As with the Project, potentially significant impacts under Alternative 3 would be reduced to a less than significant level with mitigation. However, because construction of Alternative 3 would reduce excavation, and thus with less excavation requirements, the risk of encountering an unanticipated discovery is diminished, impacts to paleontological resources would be less as compared to the Project's less than significant impact (with mitigation).

(f) *Greenhouse Gas Emissions*

Alternative 3 would eliminate the Project's expansion of the existing parking garage and parking would be reduced from 464 new spaces to 215 new spaces, an approximately 54 percent reduction compared to the Project. Alternative 3 would reduce the Project's total soil export from 87,000 CY to 17,800 CY, an approximately 80 percent reduction. In addition, Alternative 3 would develop the southern portion of the Project Site with an 8-story office building totaling approximately 105,000 square feet instead of developing 18-

story, approximately 299,088-square-foot Hotel Expansion Building and Meeting Room Addition, reducing overall floor area of development by approximately 65 percent. Due to this reduction in overall floor area of development, the overall duration of the construction program would be decreased. With the approximately 65 percent and 54 percent reduction in building and parking construction activities, respectively, the duration of building and parking construction activities would be reduced (from approximately 582 days to approximately 228 days based on the floor area reduction and overlapping building construction schedule for the Hotel Expansion Building and Meeting Room Addition and parking garage). With the approximately 80 percent reduction in grading activities under Alternative 3, the duration of grading related emissions would be shortened under Alternative 3 by approximately 80 percent (from approximately 87 days to approximately 18 days based on the corresponding 80 percent reduction in grading quantities). Therefore, Alternative 3 would result in a reduction of the overall construction program and in grading and hauling activity. Construction activities under either Alternative 3 or the Project would not conflict with SCAQMD air quality control measures that reduce GHG emissions as well as CARB's improved engine efficiency regulations and reduced idling times. As such, Alternative 3 and the Project's construction GHG emissions would be less than significant. However, Alternative 3's overall construction GHG emissions would be less as compared to the Project's less than significant impact.

Alternative 3 would retain the Project Site's existing hotel use, but the southern portion of the Project Site would not be redeveloped with additional hotel uses and the Existing Outdoor Pool Area would be maintained in its current condition. Alternative 3 would develop an office building on the southern portion of the site adjacent to the Existing Outdoor Pool Area. In addition, the existing parking garage would remain the same as under existing conditions, and all new parking for the office building would be surface level. As described above, total new square footage under Alternative 3 would be 105,000 square feet versus 299,088 square feet for the Project, a reduction of 65 percent of overall floor area of development. Thus, building energy emissions from electricity and natural gas would be less under Alternative 3 than the Project. As discussed under Transportation below, Alternative 3 would generate fewer daily trips and have a lower daily VMT compared to the Project. As discussed under Transportation below, Alternative 3 would generate fewer daily trips and have a lower daily VMT compared to the Project. Alternative 3 would reduce the Project's daily vehicle trips from 4,309 to 905 with similar TDM measures as the Project, and as a result, would reduce the Project's daily VMT from 29,995 to 6,902 (refer to Section V.6.(c)(2)(k), Transportation). Therefore, Alternative 3 would have lower GHG emissions from mobile sources. As with the Project, Alternative 3 would be constructed to LEED Gold Standards, comply with the CALGreen Code's energy saving measures, install high-efficiency appliances, incorporate water-efficient fixtures and water-efficient landscaping and irrigation, such as use of artificial turf, California Friendly® plants, and drip/subsurface irrigation (micro-Irrigation), incorporate water-efficient pool-related features, such as a leak-detection system (refer to Section II, Project Description, of this Draft EIR, for additional details). As with the Project, Alternative 3 would be located within a designated HQT and TPA, with access to regional transportation facilities in the Project Site vicinity, including the Metro B Line

(Red Line) Universal City/Studio City Station and Metro bus lines along Lankershim Boulevard in the Project vicinity, which would reduce vehicle trips and VMT for both the Project and Alternative 3. Thus, as with the Project, Alternative 3 would not conflict with the applicable GHG emission reduction plans and policies including CARB's Climate Change Scoping Plan, the 2020–2045 RTP/SCS, the City's Green New Deal, and the Los Angeles Green Building Code. Neither Alternative 3 nor the Project would result in significant GHG impacts. However, with the reduction in overall construction program including grading and hauling activities, building operational energy emissions from electricity and natural gas, and long-term mobile source emissions, GHG emissions would be less under Alternative 3 as compared to the Project's less than significant impact.

(g) *Hydrology and Water Quality*

(i) *Water Quality Standards*

(a) Construction

Construction activities under Alternative 3 and the Project, such as earth moving, maintenance and operation of construction equipment, and handling, storage, and disposal of materials, as well as erosion, could contribute to pollutant loading in stormwater runoff from the construction site. Also, exposed and stockpiled soils could be subject to wind and conveyance into nearby storm drains during storm events, and on-site watering activities for dust suppression purposes could contribute to pollutant loading in runoff from the construction site. Alternative 3 and the Project would comply with regulatory requirements, BMPs provided under the required SWPPP, and City Building Code grading procedures to ensure that pollutant loading would not exceed water quality standards. Therefore, impacts with respect to construction phase water quality standards under both the Project and Alternative 3 would be less than significant. However, because Alternative 3 would substantially reduce the quantity of excavated and stockpiled materials to be hauled away, by approximately 80 percent, there would be less potential for pollutants to enter into surface water sources or groundwater as there would be less materials present. As such, impacts would be less under Alternative 3 as compared to the Project's less than significant impact.

(b) Operation

The Project Site was developed prior to the enforcement of storm water quality BMP design, implementation, and maintenance. The Project Site currently does not implement structural BMPs for treatment of stormwater runoff. However, there is a range of non-structural BMPs that are currently utilized at the Project Site to minimize the impact of pollutant sources, which would continue under the Project. Source control measures under the City's LID, including good housekeeping, removal of trash and maintenance of driveways and parking areas, proper use and storage of pesticides, and substituting environmentally-friendly products for environmentally-hazardous products, such as soaps, solvents, and pesticides would continue on the Project Site under both Alternative 3 and the Project to reduce surface water quality impacts and prevent pollutants from

entering the local groundwater supply by percolation into landscaped areas with permeable surfaces. Under Alternative 3 and the Project, any on-site use of hazardous materials to be used in association with continued operation of the Project, such as small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance, as well as fuel storage associated with an on-site generator, would be continue to be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations such that no hazardous materials be exposed to or otherwise would adversely impact groundwater quality.

Alternative 3 and the Project would implement capture and reuse for managing stormwater runoff in accordance with current LID requirements. The proposed water quality capture and reuse system under both Alternative 3 and the Project would be constructed pursuant to the standards established by LASAN's Watershed Protection Division to ensure the treatment of contaminants without allowing seepage into the underlying soil, as required. The final drainage and treatment system design would be finalized as part of the grading and building permit process.

With implementation of the capture and reuse system, along with compliance to applicable LID requirements, Alternative 3 and the Project would reduce or eliminate the discharge of potential pollutants from stormwater runoff. Operation of Alternative 3 and the Project would result in a net reduction of pollutants compared to existing conditions as the Project Site currently has no structural BMPs for treatment of stormwater runoff.

Overall, Alternative 3's impacts with respect to surface water quality and groundwater quality during operations would be similar as compared to the Project's less than significant impact.

(ii) *Alteration of Existing Drainage Patterns*

(a) Construction

Construction activities under Alternative 3 and the Project could contribute to erosion or siltation when soils are exposed. Construction activities have the potential to temporarily alter existing drainage patterns and flows within the Project Site by altering topography, exposing the underlying soils, and increasing permeability. However, both Alternative 3 and the Project would be required to implement BMPs and erosion control measures as part of a SWPPP to manage runoff flows. With implementation of construction BMPs as part of a SWPPP and compliance to applicable regulatory requirements, impacts related to drainage pattern changes resulting in erosion, siltation, or runoff water that would exceed the capacity of existing or planned stormwater drainage systems or block or redirect the flow of flood water would be less than significant under both Alternative 3 and the Project. While Alternative 3 would require substantially less excavation, on- and off-site drainage patterns during construction would be similar under Alternative 3 and the Project and as such, Alternative 3 impacts would be similar as compared to the Project's less than significant impact.

(b) Operation

Alternative 3, as with the Project, would comply with LID requirements to ensure that stormwater treatment with operational BMPs would control pollutants associated with storm events up to the greater of an 85th percentile storm event or the first 0.75-inch of runoff flow during storm events defined in the City's LID BMPs. Drainage patterns for the Project Site would be changed because runoff would no longer be entirely discharged to the municipal storm drain system, as it is now. In addition, as part of LID compliance for the Project to manage post-construction stormwater runoff, Alternative 3 and the Project would include the installation of catch basins, planter drains, and building roof drain downspouts throughout the Project Site to collect roof and site runoff and direct stormwater away from structures through a series of underground storm drain pipes. This on-site stormwater conveyance system would serve to prevent onsite flooding and nuisance water on the Project Site. In addition, with implementation of the proposed BMPs, Alternative 3 and the Project would implement a combination of pre-treatment and capture and use systems to collect and store the first flush of stormwater runoff in tanks, and re-use the water for various purposes onsite implemented upon LA Sanitation's approval. As with the Project, the proposed drainage pattern under Alternative 3 would not be substantially different than existing conditions, with any increase in the volume of stormwater runoff not being greater than one percent compared to existing conditions. Under Alternative 3 with the on-site stormwater conveyance system, together with the LID BMPs that would capture and treat the first flush of rainfall, impacts related to drainage patterns would be similar as compared to the Project's less than significant impact.

(iii) *Conflict with a Water Quality Control Plan or Sustainable Groundwater Management Plan*

Alternative 3, similar to the Project, would be a typical in-fill development project without substantial changes to the drainage patterns in the surrounding vicinity. The Project Site is not located within a floodplain or subject to atypical flooding or water quality impacts. Alternative 3 would be required to comply with regulatory measures and would be expected to have a site drainage plan developed pursuant to the City's LID program similar to that of the Project. As discussed above, with the implementation of an on-site drainage system and BMPs accordance with current LID requirements, Alternative 3 and the Project would have less-than-significant impacts on both surface and groundwater quality during construction and operation phases. Further, Alternative 3's surface parking would not result in substantial differences to the Project's Site extent of impervious area compared to the Project. As such, Alternative 3's impacts regarding potential conflicts with a Water Quality Control Plan or Sustainable Groundwater Management Plan would be similar as compared to the Project's less than significant impact.

(h) *Land Use and Planning*

Alternative 3 would eliminate the Project's Hotel Expansion Building, Meeting Room Addition, and parking garage expansion components from the scope of the Project and reduce the Project's floor area by approximately 65 percent. Alternative 3 would include

development of an office use building on the southern portion of the Project Site. The Project and Alternative 3 would be similarly located within the Regional Center Commercial (Pre-Framework) land use designation and would not conflict with the General Plan designation that supports corporate and professional offices, residential, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities, and supporting services. The underlying RE15-1-H zoning in the southern portion of the Project Site is for residential uses. Therefore, like the Project, Alternative 3 would require the same Vesting Zone change for the Project Site to conform to a consistent C2 zoning designation across the entire Project Site. Overall, as with the Project, Alternative 3 would not substantially conflict with the majority of applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Land use impacts under both the Project and Alternative 3 would be less than significant. Under Alternative 3, land use impacts would be similar as compared to the Project's less than significant impact.

(i) *Noise and Vibration*

(i) *Noise*

(a) *Construction*

Alternative 3 would eliminate the Project's expansion of the existing parking garage and parking would be reduced from 464 new spaces to 215 new spaces, an approximately 54 percent reduction compared to the Project. In addition, Alternative 3 would develop the southern portion of the Project Site with an 8-story office building totaling approximately 105,000 square feet instead of developing 18-story, approximately 299,088-square-foot Hotel Expansion Building and Meeting Room Addition, reducing overall floor area of development by approximately 65 percent. Alternative 3 would reduce the Project's total soil export from 87,000 CY to 17,800 CY, an approximately 80 percent reduction. With the approximately 65 percent and 54 percent reduction in building and parking construction activities, respectively, the duration of building and parking construction activities would be reduced (from approximately 582 days to approximately 228 days based on the floor area reduction and overlapping building construction schedule for the Hotel Expansion Building and Meeting Room Addition and parking garage). With the approximately 80 percent reduction in grading activities under Alternative 3, the duration of grading related emissions would be shortened under Alternative 3 by approximately 80 percent (from approximately 87 days to approximately 18 days based on the corresponding 80 percent reduction in grading quantities). Due to this decrease in overall construction program due the reduction of overall development floor area and reduction in grading quantities, Alternative 3 would reduce the overall use of heavy equipment, such as loaders, graders, and haul trucks and worker trips. However, while Alternative 3 would reduce the overall use of heavy equipment, such as loaders, graders, and haul trucks and worker trips, the maximum daily noise levels, the focus of the significance analysis, would be generally similar to the Project, but reduced in duration for the overlapping phases that include the parking garage expansion. Both Alternative 3 and the Project would implement Mitigation Measures NOISE-MM-1 (Noise Barriers) and NOISE-MM-2 (Construction

Equipment Noise Shielding and Muffling Devices), as applicable, to reduce on-site construction noise levels in excess of ambient noise standards. As with the Project, impacts would be less than significant at R2, and impacts at receptors R3, R4, and R5 would be reduced to less-than-significant levels with implementation of Mitigation Measure NOISE-MM-2. Even so, with implementation of all feasible mitigation measures, Alternative 3 and the Project's construction noise impacts although temporary, would continue to be significant and unavoidable at the adjacent Sheraton Hotel (R1). Therefore, Alternative 3 and the Project would result in a temporary increase in ambient noise levels that would be significant and unavoidable and maximum daily impacts would be similar. However, as discussed above, because of the reduced duration of overlapping construction activities associated with development of the parking garage, impacts are considered less under Alternative 3 than under the Project.

Off-site construction noise impacts from haul trucks and concrete foundation trucks are discussed separately because as stated in Section IV.I, *Noise*, of this Draft EIR, haul trucks are subject to the City-approved haul truck route as discussed in the section, whereas concrete trucks are not subject to the City-approved haul truck route. Therefore, concrete trucks could travel along a variety of roadway segments and impacts from haul trucks and concrete trucks are discussed separately (see Section IV.G, *Noise*, of this Draft EIR for additional details about the specific routes for both haul trucks and concrete trucks for the Project and Project Alternatives). For the Project, grading and excavation activities for the Hotel Expansion Building and Meeting Room Addition and expansion of the existing parking garage would occur at the same time and would be a maximum of approximately 70 worker trips and 50 haul truck trips per hour (assuming a maximum of 400 haul truck trips per day evenly distributed over an eight-hour work day). The Project's increase in truck and vehicle trips would increase existing traffic noise levels by a maximum of 3.1 dBA CNEL which would not exceed the noise significance threshold. As stated above, Alternative 3 would reduce the Project's total soil export from 87,000 CY to 17,800 CY, an approximately 80 percent reduction, and a corresponding 80 percent reduction of truck trips and number of days with truck trips would occur. Since Alternative 3 would reduce the number of truck trips required to haul excavated material and reduce the number of days with truck trips, the duration of off-site roadway noise during the grading/excavation phase would be reduced (from approximately 87 days to approximately 18 days based on the corresponding 80 percent reduction in grading quantities). Alternative 3 and the Project impacts related to off-site construction traffic noise would be less than significant, however because of the reduced number of days and truck trips, impacts would be less under Alternative 3 as compared to the Project's significant and unavoidable impact (with mitigation).

(b) Operation

Alternative 3 would eliminate the Project's expansion of the existing parking garage and parking would be reduced from 464 new spaces to 215 new spaces, an approximately 54 percent reduction compared to the Project. In addition, Alternative 3 would develop the southern portion of the Project Site with an 8-story office building totaling approximately

105,000 square feet instead of developing 18-story, approximately 299,088-square-foot Hotel Expansion Building and Meeting Room Addition, reducing overall floor area of development by approximately 65 percent and would not develop the restaurant, spa, lounge, and pool uses (indoor and outdoor spaces) as under the Project. Like the Project, Alternative 3 would include new mechanical equipment (e.g., air conditioners, fans, and related equipment) which would be located on the Project Site.

Project and Alternative 3 outdoor mechanical equipment would be designed so as not to increase the existing ambient noise levels by 5 dBA in accordance with the City's Noise Regulations (Section 112.02 of the LAMC). A noise level reduction of 15 dBA has been assumed due to implementation of Project Design Feature NOI-PDF-2 which includes enclosures and other forms of noise attenuation. Similar to the Project, Alternative 3 mechanical equipment noise levels would not result in an exceedance of the threshold for sensitive receptors at the Sheraton Hotel (R1). Receptors located at a further distance from the Project Site would experience even lower noise levels. While Alternative 3 eliminate the Project's expansion of the existing parking garage and parking would be reduced from 464 new spaces to 215 new spaces, an approximately 54 percent reduction compared to the Project, the office building uses developed under Alternative 3 would have less traffic than the Project's hotel uses. As discussed under Transportation below, Alternative 3 would generate fewer daily trips compared to the Project. Alternative 3 would reduce the Project's daily vehicle trips from 4,309 to 905 with similar TDM measures as the Project (refer to Section V.6.(c)(2)(k), Transportation). Therefore, the amount of traffic generated with Alternative 3 would be less on any one of the analyzed roadway segments as compared to the Project. Therefore, similar to the Project, operational traffic noise increases associated with Alternative 3 would be less than significant because as described in Section IV. I, *Noise*, of the Draft EIR and shown in Table IV.I-13, *Off-Site Traffic Noise Impacts – Future (2027) Plus Project Conditions*, the maximum increase in Project-related operational traffic noise levels over existing traffic noise levels would be 0.5 dBA CNEL, which would occur along W.C. Fields Drive between Universal Studios Blvd and Barham Blvd. Therefore, as with the Project, Alternative 3 impacts related to on-site composite noise (mechanical equipment, loading dock/refuse collection activity, emergency generator, parking structure noise, and off-site traffic noise) would be less than significant. However, because Alternative 3 would not develop the restaurant, spa, lounge, and pool uses (indoor and outdoor spaces) as under the Project and would generate less traffic noise, Alternative 3's impacts related to on-site composite noise would be less as compared to the Project's less than significant impact.

(ii) *Vibration*

(a) *Construction*

Construction activities can generate varying degrees of ground vibration, depending on the construction procedures and the type of construction equipment used. The operation of construction equipment generates vibrations that travel through the ground and diminish in amplitude with distance from the source. With regard to potential building damage, Alternative 3 and the Project would generate groundborne construction vibration

forces during building demolition and excavation/grading activities when heavy construction equipment, such as large bulldozers, drill rigs, and loaded trucks, would be used. Per NOI-PDF-3 (Impact Pile Drivers Prohibited), both the Project and Alternative 3 would not require or allow the use of impact pile drivers; however, augured, drilled, or vibratory piles are permitted. Under both the Project and Alternative 3, construction vibration levels would be below the significance threshold of 0.5 inches PPV at the nearest buildings, the Sheraton parking garage, Sheraton hotel, and existing hotel buildings. Temporary construction-related vibration would not exceed the established threshold for human annoyance at the nearest buildings, at the nearest buildings, the Sheraton hotel under both Alternative 3 and the Project.

In addition to the on-site construction equipment, heavy-duty construction trucks would generate groundborne vibration as they travel along the Project and Alternative 3's anticipated haul routes. Although the Project and Alternative 3 would not result in significant vibration impacts from construction trucks along haul routes, these impacts would be less under Alternative 3 than the Project. Alternative 3 would eliminate excavation for the existing parking garage expansion and reduce the Project's grading and export (hauling) of removed soils by approximately 80 percent, thereby reducing the number of trucks utilizing the haul routes during the grading/excavation phase. As such, the duration of groundborne vibration impacts along these haul routes would be reduced under Alternative 3. Since Alternative 3 would reduce the Project's grading activities and the use of heavy construction equipment, such as large bulldozers and loaded trucks, vibration impacts for Alternative 3 would be less as compared to the Project's less than significant impact.

(b) Operations

Operation of Alternative 3 would include typical commercial-grade stationery mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce vibration. Groundborne vibration generated by the above-mentioned activities would generate approximately up to 0.005 in/sec PPV adjacent to the Project Site.⁸ The potential vibration levels from all Alternative 3 operational sources at the closest existing sensitive receptor locations would be less than the significance threshold of 0.5 in/sec PPV for potential Category I building damage. As such, Alternative 3, similar to the Project, would not result in the generation of excessive groundborne vibration, and vibration impacts would be less than significant.

Alternative 3, similar to the Project, would locate mechanical equipment in the underground and/or enclosed locations which would absorb groundborne vibration. Thus, groundborne vibration from the operation of such mechanical equipment would be less than the 0.5-in/sec structural damage threshold and the 72-VdB human annoyance threshold and would not impact any of the off-site vibration sensitive receptors. Therefore,

⁸ This vibration estimate is based on data presented in the USDOT Federal Transit Administration, 2006; which are included in Appendix I of this Draft EIR.

Alternative 3, similar to the Project, would not result in the generation of excessive groundborne vibration, and vibration impacts to any vibration sensitive receptors, including the adjacent Sheraton Hotel, with respect to human annoyance and impacts would be less than significant.

Alternative 3, like the Project, would result in less than significant operational noise and vibration impacts. Therefore, Alternative 3's operational impacts were determined to be similar as compared to the Project's less than significant impact.

(j) *Public Services*

(i) *Fire Protection*

(a) *Construction*

Construction activities under both the Project and Alternative 3 would potentially increase the demand for or physically impede fire protection and emergency medical services. During construction, the Project and Alternative 3 would implement Project Design Feature TRAF-PDF-2, to provide a City-reviewed CMP to minimize impacts to emergency vehicles during construction. Fire safety during construction would be further addressed by OSHA safety and health provisions. Neither the Project nor Alternative 3 would increase fire services demand to the extent that the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. Therefore, impacts during construction with respect to fire protection under either the Project or Alternative 3 would be less than significant. However, since Alternative 3 would reduce the overall scale of construction activities compared to the project, Alternative 3's impacts would be less as compared to the Project's less than significant impacts.

(b) *Operation*

As with the Project, Alternative 3's estimated employees would increase demand on fire protection and emergency medical services. However, Alternative 3 would increase the estimated news in employees to 503, an approximately 56 percent increase, compared to the Project's 321 new FTE employees. However, Alternative 3 would not result in an increase in visitors due to the lack of an additional 395 hotel rooms, restaurant, or retail uses compared to the Project. Both the Project and Alternative 3 would comply with all applicable OSHA, Building Code, Fire Code, other LAMC, and LAFD requirements. The Project and Alternative 3 would also meet LAFD recommended fire prevention and protection features including building identification, emergency access lanes, and building setbacks. Additionally, plans and specifications would be submitted to LAFD prior to the provision of necessary permits. Compliance with applicable codes and inclusion of LAFD recommendations, such as incorporation of sprinklers, would result in safe, modern buildings and would reduce demand for LAFD services. Overall, operation of the Project or Alternative 3 would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire station facilities. Therefore, impacts to fire protection and emergency medical services during operation of either the Project or

Alternative 3 would be less than significant. While the number employees would increase under Alternative 3, there would be no additional visitors under Alternative 3 due to the lack of additional hotel rooms, restaurant, and retail uses, which would result in a lower overall occupancy of the Project Site and as such, Alternative 3's impacts would be less as compared to the Project's less than significant impact.

(ii) *Police Protection*

(a) *Construction*

Construction activities under either the Project or Alternative 3 would potentially increase demand for police protection services or physically impede police protection service access on the local roadway network. During construction, both the Project and Alternative 2 would implement Project Design Feature TRAF-PDF-2, a City-reviewed CMP, to ensure that emergency access would be maintained in the vicinity. Both the Project and Alternative 3 would also implement Project Design Feature POL-PDF-1 to limit access to construction areas, including private security, construction fencing, locked entry, and security lighting. With the implementation the CMP pursuant to Project Design Feature TRAF-PDF-1 and the security features of Project Design Feature POL-PDF-1, neither the Project nor Alternative 2 would increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, construction impacts would be less than significant under both the Project and Alternative 3. However, because Alternative 2 would reduce the scale of and duration of construction activities, due to the 80 percent reduction in excavation and hauling of exported soils, Alternative 3's impacts would be less as compared to the Project's less than significant impact on police services.

(b) *Operation*

As with the Project, Alternative 3's estimated employees would increase demand of police services. However, Alternative 3 would increase the estimated employees to 503, an approximately 56 percent increase, compared to the Project's 321 new FTE employees. However, Alternative 3 would not result in an increase in visitors due to the lack of an additional 395 hotel rooms, restaurant, or retail uses compared to the Project. Because the Project or Alternative 3 do not include a residential component, neither would affect the North Hollywood Community Police Station's officer-to-population ratio of 1:733. LAPD does not provide crime rates for non-resident population; rather, crime associated with non-resident population is incorporated into the overall community service ratio based on the residential population. In addition, both the Project and Alternative 3 would implement Project Design Feature POL-PDF-2, which would include a security program, such controlled access, camera surveillance, and on-site security personnel that would reduce demand on police services. Accordingly, there would be no need for expanded police facilities to accommodate increased demand. Moreover, LAPD correspondence

stated that the Project would not result in the need for new or altered police facilities.⁹ As Alternative 3 does not increase residential population and results in a decrease in non-residential service population compared to the Project, the LAPD's determination would be equally applicable to Alternative 3. Thus, neither the Project nor Alternative 3 would result in substantial adverse physical impacts associated with the provision of a new or physically altered police facility, the construction of which would cause significant environmental impacts. While the number employees would increase under Alternative 3, there would be no additional visitors under Alternative 3 due to the lack of additional hotel rooms, restaurant, and retail uses, which would result in a lower overall occupancy of the Project Site. Thus, despite neither the Project nor Alternative 3 having a residential component, since occupancy of the Project Site would be greater under the Project, Alternative 3's impacts would be less as compared to the Project's less than significant impact.

(k) *Transportation*

(i) *Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities*

As with the Project, Alternative 3 would not conflict with the applicable policies of the City's Mobility Plan 2035, Bicycle Parking Ordinance, TDM Ordinance, Central City Community Plan, Vision Zero, Plan for a Healthy Los Angeles, and Citywide Design Guidelines. These land use plans were adopted for the purpose of creating land use patterns that support infill and centralized development, the efficient use of existing infrastructure and services, and to support alternative transportation modes, which would ultimately result in the reduction of environmental effects, such as vehicle emissions and other greenhouse gases. Consistent with the Mobility Plan 2035, both the Project and Alternative 3 would be pedestrian-oriented and uses that support alternative transportation use near transit facilities. The Project and Alternative 3 would support healthy lifestyles by locating jobs adjacent and near transit and providing bicycle parking, and through these measures, would support reductions in VMT. Neither the Project nor Alternative 3 would conflict with programs or policies addressing transit, roadway, bicycle and pedestrian facilities, transportation impacts. Impacts under Alternative 3 would be similar as compared to the Project's less than significant impact.

(ii) *Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)*

Alternative 3 would reduce the Project's daily vehicle trips from 4,309 to 905 with similar TDM measures as the Project, and as a result, would reduce the Project's daily VMT

⁹ LAPD, Central Division, Officer Alfonso Velasco, letter to Alan Como, Los Angeles Planning Department, May 24, 2022.

from 29,995 to 6,902.¹⁰ The Project and Alternative 3 would have an 8.8 and 8.7 work VMT per employee, respectively. As such, the VMT per employee would be well Impacts regarding VMT under both the Project and Alternative 3 would be consistent with the LADOT's TAG and, thus, consistent with CEQA Guidelines Section 15064.3(b). Therefore, VMT impacts under either the Project or Alternative 3 would be less than significant. However, because Alternative 3 would have a much lower daily VMT compared to the Project, Alternative 3's impacts would be less as compared to the Project's less than significant impact.

(iii) Geometric Design Hazards

Alternative 3 would reduce the Project's daily vehicle trips due to the change in operational land use from hotel, restaurant, and retail to office use. The Project is projected to add 29 or more trips to the US-101 Southbound Off-Ramp at Lankershim Boulevard during the weekly PM peak hour. While queue lengths would be approximately 27 feet during the weekday PM peak hour, this queue length can be accommodated by the existing off-ramp and vehicle queue would not extend on to the mainline. As such, the Project would not result in a safety impact. Because Alternative 3 would reduce daily vehicle trips compared to the Project, Alternative 3 would also not substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts would be less than significant. However, with the reduction in vehicle trips under Alternative 3, impacts related to design hazards (freeway safety) would be less as compared to the Project's less than significant impact.

(l) Tribal Cultural Resources

Alternative 3 would not include the existing parking garage expansion or removal of the Existing Outdoor Pool Area and thus, would eliminate the Project's construction activities required for excavation of these components. However, the depth for excavation for other Project components would be approximately 50 feet. The Project would result in a cut and fill balance of 87,000 CY of grading. Alternative 3's reduced excavation would reduce the Project's total grading by approximately 80 percent. Under both the Project and Alternative 3, excavation into native soils (beneath the upper fills soils) has the potential to encounter previously undiscovered subsurface tribal cultural resources. Both the Project and Alternative 2 would be required to adhere to the City's conditions of approval for the treatment of inadvertent tribal cultural resource discoveries. With adherence to the City's conditions of approval, construction activities would not cause a substantial adverse impact to tribal cultural resources, and impacts would be less than significant under both the Project and Alternative 3. However, because construction of Alternative 3 would reduce the Project's extent of excavation, and thus with less excavation requirements, the risk of encountering an unanticipated discovery is diminished, impacts to tribal cultural resources would be less as compared to the Project's less than significant impacts.

¹⁰ See Appendix K-5 of this Draft EIR for VMT Calculator results of the Alternative 3 with TDM measures similar to the Project.

(m) *Utilities and Service Systems*

(i) *Water Supply*

(a) *Construction*

Construction activities under the Project or Alternative 3 would result in an intermittent demand for water, including dust control, cleaning of equipment, removal and re-compaction, and other related water-consuming activities. Water use for construction of both the Project would range from 1,000 to 2,000 gpd.¹¹ As Alternative 3 would reduce the amount of grading and excavation required by 80 percent (from approximately 87 days to approximately 18 days based on the corresponding 80 percent reduction in grading quantities) and would reduce the total number of construction days, the daily construction water demand would be similar, but the total amount of construction water would be reduced under Alternative 3 by 80 percent accordingly. The existing water infrastructure has adequate capacity for existing site conditions (estimated to be 9,000 gpd) and, as such, would have adequate capacity for construction activities. New water distribution lines would be constructed onsite, with minor off-site work associated with connections to the public water main. Impacts on water supply and infrastructure during construction would be less than significant under both Alternative 3 and the Project. However, because Alternative 3 would reduce the duration and scale of earthwork by 80 percent, water required for construction activity would be less under Alternative 3 as compared to the Project's less than significant impact.

(b) *Operation*

Alternative 3 would reduce the overall scale the Project, including not providing any new development in the northern portion of the Project Site with removal of the Meeting Room Addition. The reduction in building height of the office use building compared to the Hotel Expansion Building and scale of development under Alternative 3 would reduce fire flow requirements. Thus, it is anticipated that greater fire flow over existing conditions would not be required. The Project Site currently has adequate fire flow to serve either the Project or Alternative 3 to demonstrate compliance with Section 57.507.3 of the LAMC providing 9,000 gpm from the existing six hydrants. Both the Project and Alternative 3 would incorporate a fire sprinkler suppression system which can provide 1,250 gpm for the proposed development. Therefore, there is adequate fire flow available to meet the flow required for either the Project or Alternative 3.

Both the Project and Alternative 3 would increase long-term water demand for consumption, operational uses, maintenance, and other activities on the Project Site. Domestic water demand for the Project, subtracting water conservation features, is estimated to be approximately 112,868 gpd (refer to Table I of the approved WSA, Appendix M-2 of this Draft EIR). In addition, with implementation of WS-PDF-1, the Project's total water demand would be lowered to approximately 78,764 gpd. Water

¹¹ KPFF Consulting Engineers, *Infrastructure Report*, p. 26, June 2023.

demand for Alternative 3 is calculated using sewer generation factors published by the City of Los Angeles Department of Public Works, Bureau of Sanitation and Environment. Using a rate of 170 gpd/ksf, Alternative 3's 105,000 square feet of office use would have a water demand of 17,850 gpd day. The approved WSA for the Project demonstrates LADWP has sufficient water supplies to meet the demand of the Project. As Alternative 3 would result in less water demand than the Project, impacts to water supply under Alternative 3 would be less as compared to the Project's less than significant impact.

(ii) *Wastewater*

(a) *Construction*

During construction of either the Project or Alternative 3, a negligible amount of wastewater would be produced by construction workers because it is anticipated that portable toilets that would dispose of the wastewater off-site would be provided. As with the Project, construction of Alternative 3 would include the construction of all necessary on- and off-site sewer pipe improvements and connections to adequately connect to the City's existing sewer system. Construction of the wastewater system would occur onsite and in the immediate vicinity. All construction impacts would be temporary and would cease once the installation is complete. Due to the reduced excavation and reduce development square footage, Alternative 3 would result in a shorter construction duration and therefore, less wastewater generated during construction. Alternative 3's construction activity would not require or result in the relocation or construction of new or expanded wastewater treatment facilities. Alternative 3's impacts related to wastewater infrastructure and treatment capacity during construction would be less as compare to the Project's less than significant impact.

(b) *Operation*

Wastewater generation for the Project was estimated at 171,645 gpd (see Table IV.M.2-3, *Estimated Proposed Wastewater Generation Increase*, in Section IV.M.2, *Wastewater*, of this Draft EIR). The estimated wastewater generation from the proposed office uses would be less than that of the Project. The sewage generation rate used to calculate Alternative 3 and the Project's water demand above would remain the same, and the estimated wastewater generation for Alternative 3 would be 17,850 gpd.

Since the sewer main lines serving the Project Site have adequate capacity to accommodate the Project, they would also have adequate capacity to accommodate Alternative 3 which would also be served by the existing sewer main lines. Future detailed gauging and evaluation will be needed as part of the standard permit process to identify a specific sewer connection point and confirm the sewer capacity near the time of Project or Alternative 3 development. Although not anticipated, if the public sewer lacks sufficient capacity, then the Project or Alternative 3 would be required to upgrade sewer lines to a point in the sewer system with sufficient capacity. Ultimately, sewage flow under the Project or Alternative 3 would be conveyed to the Hyperion Water Reclamation Plant (HWRP), which has sufficient capacity for the Project and Alternative 3. Sewage flows

under the Project or Alternative 3 would represent only a small fraction of the remaining available capacity of 175 mgd at the HWRP. As with the Project, Alternative 3 would not require or result in the relocation or construction of new or expanded wastewater treatment facilities and impacts on wastewater infrastructure and treatment capacity would be less than significant. Alternative 3 would have less wastewater generation compared to the Project, and therefore, Alternative 3's impacts would be less as compared to the Project's less than significant impacts.

(3) Comparison of Impacts

As evaluated above and shown in Table V-2 on page V-8, 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.

(4) Relationship of the Alternative to Project Objectives

Alternative 3 would not develop the northern portion of the Project Site with the Meeting Room Addition and would replace the Project's 18-story Hotel Expansion Building in the southern portion of the Project Site with an 8-story office building. All parking on site for Alternative 3 would either be in the existing parking garage or surface level parking. Alternative 3 would reduce the overall scale of development as compared to the Project. Office uses would not be permitted by the existing RE15-1-H zoning on the southern portion for the Project Site, but would be permitted with the proposed C2 zoning for this portion of the Project Site, similar to the Project.

Based on the above, Alternative 3 would fully meet the following Project Objectives:

Objective 4: Provide efficient and convenient site access for all modes of transportation, and enhance pedestrian circulation and bicycle amenities.

Objective 6: Support the City's commitment to green building design, conservation, recycling, and sustainability through sustainable design and construction that promotes resource conservation, including waste reduction, efficient water management techniques, and conservation of energy.

Objective 9: Strengthen the economic vitality of the local area by expanding employment opportunities and visitor-serving uses through construction and operation of an infill project within a TPA on a site that is served by existing infrastructure and would generate additional annual tax revenues to the City, including sales taxes and transient occupancy taxes.

Based on the above, Alternative 3 would partially meet the following Project Objectives:

Objective 1: Expand hotel capacity and local employment opportunity through infill development on a parcel located within close proximity to tourist destinations, entertainment-related uses, and transit centers, thereby promoting local, regional, and

state land use and mobility objectives, enabling visitors to use alternative modes of transportation (e.g., walking, bicycling, transit) and reducing vehicle miles traveled.

Objective 3: Preserve views to and from the Hollywood Hills by developing a hotel building that is compatible with the height and massing of nearby high-rise buildings while aligning the building in a way that preserves existing view corridors from public viewing areas.

Based on the above, Alternative 3 would not meet the following Project Objective:

Objective 2: Maximize the usefulness of the Project Site by redeveloping underutilized portions of the property and upgrading other areas of the Project Site with an economically viable designed project with comprehensive ground-level landscape and entry upgrades and a new hotel building with guestrooms, spa and meeting rooms, and restaurants to support anticipated market demand.

7. 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*, based on the detailed evaluation of the potential impacts associated with each Alternative provided in the previous sections. 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.

TABLE V-3
ABILITY OF ALTERNATIVES TO MEET PROJECT OBJECTIVES

Project Objective	Project	Ability to Meet Project Goal/Objective		
		Alternative 1 No Project/ No Development	Alternative 2 Surface Parking	Alternative 3 Office Use
1. Expand hotel capacity and local employment opportunity through infill development on a parcel located within close proximity to tourist destinations, entertainment-related uses, and transit centers, thereby promoting local, regional, and state land use and mobility objectives, enabling visitors to use alternative modes of transportation (e.g., walking, bicycling, transit) and reducing vehicle miles traveled.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Partially Meets Objective
2. Maximize the usefulness of the Project Site by redeveloping portions of the property and upgrading other areas of the Project Site with an economically viable designed project with comprehensive ground-level landscape and entry upgrades and a new hotel building with guestrooms, spa and meeting rooms, and restaurants to support anticipated market demand.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective	Does not Meet Objective
3. Preserve views to and from the Hollywood Hills by developing a hotel building that is compatible with the height and massing of nearby high-rise buildings while aligning the building in a way that preserves existing view corridors from public viewing areas.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Partially Meets Objective
4. Provide efficient and convenient site access for all modes of transportation, and enhance pedestrian circulation and bicycle amenities.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Fully Meets Objective

**TABLE V-3
ABILITY OF ALTERNATIVES TO MEET PROJECT OBJECTIVES**

Project Objective	Project	Ability to Meet Project Goal/Objective		
		Alternative 1 No Project/ No Development	Alternative 2 Surface Parking	Alternative 3 Office Use
5. Strengthen the economic vitality of the local area by expanding employment opportunities and visitor-serving uses through construction and operation of an infill project within a TPA on a site that is served by existing infrastructure and would generate additional annual tax revenues to the City, including sales taxes and transient occupancy taxes.	Fully Meets Objective	Does not Meet Objective	Fully Meets Objective	Partially Meets Objective
6. Support the City's commitment to green building design, conservation, recycling, and sustainability through sustainable design and construction that promotes resource conservation, including waste reduction, efficient water management techniques, and conservation of energy.	Fully Meets Objective	Does not Meet Objective	Fully Meets Objective	Fully Meets Objective

SOURCE: ESA, 2023

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 is 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 associated with Alternative 3. Therefore, Alternative 3 offers the greatest reduction in construction activity and construction impacts including those associated with noise and vibration.

As shown in Table V-2, Alternative 3, the Office Use Alternative, would broadly reduce the Project's environmental impacts, with a higher number of issues 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 alternatives it would not necessarily be considered superior to the Project and would not meet the Project's attainment of its Project Objectives.