IV. Environmental Impact Analysis

H. Land Use and Planning

1. Introduction

This section analyzes the Project's potential impacts with regard to land use and planning. The analysis in this section evaluates whether the Project would physically divide an established community and whether the Project would conflict with any land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Analyses of consistency and/or potential conflicts with plans that are more directly related to other environmental topics are addressed in other sections of this Draft EIR. For example, refer to Section IV.A, *Air Quality*, for a discussion of the Project's consistency with the South Coast Air Quality Management Plan.

Evaluation of specific policies set forth in the Southern California Association of Governments' (SCAG) 2020-2045 Regional Transportation Plan/Sustainability Communities Strategy (RTP/SCS) plans and the City of Los Angeles General Plan Framework Element (Framework Element) and Sherman Oaks-Studio City-Toluca Lake-Cahuenga Community Plan (Community Plan) are provided in tables contained in **Appendix H***, Land Use Plans and Policies: Project Consistency Tables*, of this Draft EIR.).

2. Environmental Setting

a) Regulatory Framework

The following describes the primary regulatory requirements regarding land use and planning. Applicable plans and regulatory documents/requirements include the following:

- California Government Code Section 65302
- Senate Bill 375
- Senate Bill 743
- Southern California Association of Governments 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy
- City of Los Angeles General Plan
- Sherman Oaks-Studio City-Toluca Lake-Cahuenga Community Plan
- Los Angeles Municipal Code

- Citywide Design Guidelines
- Transit Priority Area in the City of Los Angeles (ZI No. 2427)

(1) State

(a) California Government Code Section 65302

California law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals. As stated in Section 65302 of the California Government Code, "The general plan shall consist of a statement of development policies and shall include a diagram or diagrams and text setting forth objectives, principle, standard, and plan proposals." While a general plan will contain the community vision for future growth, California law also requires each plan to address the mandated elements listed in Section 65302. The mandatory elements for all jurisdictions are land use, circulation, housing, conservation, open space, noise, and safety.

(b) Senate Bill 375

On September 30, 2008, Senate Bill (SB) 375 was instituted to help achieve Assembly Bill (AB) 32's greenhouse gas (GHG) emission reduction goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) achievement of greenhouse gas (GHG) emission reduction targets for the transportation sector set forth in AB 32. It establishes a process for the California Air Resource Board (CARB) to develop GHG emission reduction targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations (MPO) to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses California Environmental Quality Act (CEQA) streamlining as an incentive to encourage residential or mixed-use residential projects, which help achieve AB 32 goals to reduce GHG emissions.

(c) *Senate Bill 743*

In September 2013, Governor Edmund G. "Jerry" Brown signed SB 743, which made several changes to CEQA for projects located in areas served by transit. Among other things, SB 743 added Public Resources Code (PRC) Section 21099, which provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." PRC Section 21099(a) defines the following:

- "Infill site" means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

- "Transit priority area" means an area within 0.5 mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.

PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods."

(2) Regional

(a) Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal)

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also known as Connect SoCal. The 2020-2045 RTP/SCS presents a long-term transportation vision through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The 2020-2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, and the provision of services by other regional agencies. SCAG's overarching strategy for achieving its goals is integrating land use and transportation. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system. Rooted in past RTP/SCS plans, Connect SoCal's "Core Vision" centers on maintaining and better managing the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. The plans "Key Connections" augment the "Core Vision" to address challenges related to the intensification of core planning strategies and increasingly aggressive GHG reduction goals, and include but are not limited to, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. Connect SoCal intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions' overall quality of life. These benefits include but are not limited to a five percent reduction in VMT per capita and vehicle hours traveled by nine percent, increase in work-related transit trips by two percent, create more than 264,500 new jobs, reduce greenfield development by 29 percent, and, building off of the 2016-2040 RTP/SCS, increase the share of new regional household growth occurring in High Quality Transit Areas (HQTA's)[1] by six percent and the share of new job growth in HQTAs by 15 percent.

[1] HQTAs are corridor-focused areas within 0.5 mile of an existing or planned transit stop or a bus transit corridor with a 15-minutes or less service frequency during peak commuting hours.

(3) Local

(a) City of Los Angeles General Plan

The City of Los Angeles General Plan (General Plan)[2], originally adopted in 1974, sets forth goals, objectives, policies, and programs to provide an official guide to the future development of the City, while integrating a range of state-mandated elements,[3] including Land Use, Circulation (Mobility Plan 2035), Housing, Conservation, Open Space, Safety, Noise, and Air Quality Elements. The City's General Plan also includes the Framework Element, the Health and Wellness Element (Plan for a Healthy Los Angeles), the Infrastructure Systems Element, and the Public Facilities & Services Element. Both the City's General Plan land use controls and the goals, objectives, and policies within individual elements of the General Plan include numerous provisions that are intended to avoid or reduce potential adverse effects on the environment. The elements that make up the City's General Plan that apply to the Project are described in more detail below.

(i) Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element) establishes the conceptual basis for the City's General Plan. The Framework Element sets forth a Citywide comprehensive long-range growth strategy and establishes Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. The Framework Element provides guidelines for future updates of the City's community plans and does not supersede the more detailed community and specific plans.

(a) Land Use Chapter

The Framework Element's Land Use Chapter designates Districts (i.e., Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, and Mixed-Use Boulevards) that include standards and policies that shape the scale and intensity of proposed uses with the purpose of supporting the vitality of the City's residential neighborhoods and commercial districts. The establishment of the designated arrangement of land uses and development densities addresses an array of environmental issues, including, but not limited to, reductions in VMT, reductions in noise impacts, improved efficiency in the use of energy, improved efficiency and thus greater service levels within the infrastructure systems, availability of open space, compatibility of land uses, support for alternative modes of transportation, and provision of an attractive pedestrian environment.

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2 City of Los Angeles, Department of City Planning, City of Los Angeles General Plan, https://planning.lacity.org/plans-policies/general-plan-overview. Accessed September 19, 2022.

3 The term "element" refers to the topics that California law requires to be covered in a general plan (Government Code Section 65302). In addition, State law permits the inclusion of optional elements which address needs, objectives or requirements particular to that city or county (Government Code Section 65303).

(b) Urban Form and Neighborhood Design Chapter

The Framework Element's Urban Form and Neighborhood Design Chapter establishes the goal of creating a city that is attractive to future investment and a city of interconnected, diverse neighborhoods that builds on the strength of those neighborhoods and functions at both the neighborhood and Citywide scales. The purpose of the Urban Form and Neighborhood Design Chapter is two-fold: first, to support the population distribution principles of the General Plan Framework through proper massing and design of buildings and second, to enhance the physical character of neighborhoods and communities within the City.[4] The General Plan Framework does not directly address the design of individual neighborhoods or communities but embodies general neighborhood design and implementation programs that guide local planning efforts and lay a foundation for community plan updates. The Urban Form and Neighborhood Design Chapter encourages growth in areas that have a sufficient base of both commercial and residential development to support transit service. The existing and planned transit system provides the opportunity to concentrate development and conserve the existing character of stable neighborhoods.

(c) Open Space and Conservation Chapter

The Framework Element's Open Space and Conservation Chapter provides guidance for overall City provision of open space and sets forth policies for the protection of the City's natural environment resources. The Open Space and Conservation Chapter's objectives are oriented around the conservation of natural resources, provision of outdoor recreational opportunities, minimization of public risks from environmental hazards, and use of open space to enhance community and neighborhood character. Economic, social, and ecological imperative require the City to take full advantage of all existing open space elements. The ecological dimension is based on the improvement of water quality and supply, the reduction of flood hazards, improved air quality, and the provision of ecological corridors for birds and wildlife.

(d) Economic Development Chapter

The Framework Element's Economic Development Chapter includes goals, policies and objectives that address the appropriate land use locations for development. The chapter also establishes mutual development objectives for land use and economic development. This Chapter set forth policies for the development of an infrastructure investment strategy to support population and employment growth areas. The Chapter also includes goals, objectives, and policies focused on preserving commercial uses within walking distance to residential areas, and promoting opportunities in areas where growth can be accommodated without encroaching on residential neighborhoods. It also focuses on establishing a balance of land uses that provide for commercial and industrial

4 City of Los Angeles General Plan Framework, page 5-1, et. seq.

development which meet the needs of local residents, sustaining economic growth, and assuring maximum feasible environmental quality.

(e) Transportation Chapter

The Framework Element's Transportation Chapter includes proposals for major improvements to enhance the movement of goods and to provide greater access to major intermodal facilities. While the focus of the Transportation Chapter is on guidance for transportation investments, the Transportation Chapter also includes goals, policies and objectives that overlap with policies included in other Framework chapters of the General Plan Framework regarding land use patterns and the relationship of the pedestrian system to arrangement of land uses. The Transportation Chapter of the General Plan Framework is implemented through the General Plan's Mobility Plan 2035 (Mobility Plan), which is a comprehensive update of the General Plan Transportation Element.

(f) Infrastructure and Public Services Chapter

The Framework Element's Infrastructure and Public Services Chapter addresses infrastructure and public service systems, including wastewater, stormwater, water supply, solid waste, police, fire, libraries, parks, power, schools, telecommunications, street lighting, and urban forests. For each of the public services and infrastructure systems, basic policies call for monitoring service demands and forecasting the future need for improvements, maintaining an adequate system/service to support the needs of population and employment growth, and implementing techniques that reduce demands on utility infrastructure or services. Generally, these techniques encompass a variety of conservation programs (e.g., reduced use of natural resources, increased site permeability, watershed management, and others). Strategic public investment is advocated in the Infrastructure and Public Services Chapter as a method to stimulate economic development as well as maintain environmental quality. Attention is also placed on the establishment of procedures for the maintenance and/or restoration of service after emergencies, including earthquakes.

(ii) Transportation Element

The Transportation Element (Mobility Plan), adopted on January 20, 2016, and readopted September 7, 2016, is a comprehensive update of the General Plan Transportation Element. The Mobility Plan 2035 provides the policy foundation for achieving a transportation system that balances the needs of all road users, incorporates "complete streets" principles and lays the policy foundation for how future generations of Angelenos interact with their streets, in compliance with the Complete Streets Act (AB 1358).

The purpose of the Mobility Plan is to present a guide to the future development of a Citywide transportation system for the efficient movement of people and goods. While the Mobility Plan focuses on the City's transportation network, it complements other components of the General Plan that pertain to the arrangement of land uses to reduce VMT and policies to support the provision and use of alternative transportation modalities.

The Mobility Plan includes the following five main goals that define the City's high-level mobility priorities:

- Safety First;
- World Class Infrastructure;
- Access for All Angelenos;
- Collaboration, Communication, and Informed Choices; and
- Clean Environments and Healthy Communities.

(iii) Conservation Element

The City of Los Angeles General Plan includes a Conservation Element, which addresses the preservation, conservation, protection, and enhancement of the City's natural resources. Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes an objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes and a corresponding policy to continue protecting historic and cultural sites and/or resources potentially affected by proposed land development, demolition, or property modification activities. The Conservation Element refers to the Open Space Element for a discussion of open space aspects of the City, including park sites.

(iv) Health and Wellness Element (Plan for a Healthy Los Angeles)

The Plan for a Healthy Los Angeles, the Health and Wellness Element of the City's General Plan, provides high-level policy vision, along with measurable objectives and implementation programs to elevate health as a priority for the City's future growth and development.[5] Through a new focus on public health from the perspective of the built environment and City services, the City seeks to achieve better health and social equity through its programs, policies, plans, budgeting, and community engagement. The plan acknowledges the relationship between public health and issues such as transportation, housing, environmental justice, and open space, among others. The plan includes Chapter 5 *An Environment Where Life Thrives*, which identifies the following environmental policies:

- Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.
- Reduce negative health impacts for people who live and work in close proximity to industrial uses and freeways through health promoting land uses and design solutions.

5 Plan for a Healthy Los Angeles, A Health and Wellness Element of the General Plan, March 2015, https://planning.lacity.org/odocument/7f065983-ff10-4e76-81e5-e166c9b78a9e/Plan_for_a_Healthy_Los_Angeles.pdf. Accessed December 9, 2021.

- Protect communities' health and well-being from exposure to noxious activities (for example, oil and gas extraction) that emit odors, noise, toxic, hazardous, or contaminant substances, materials, vapors, and others.
- Explore opportunities to continue to remediate and redevelop brownfield sites.
- Increase the city's resilience to risks (increasing temperatures and heat related effects, wildfires, reduced water supply, poor air quality, and sea level rise) resulting from climate change.
- Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution.

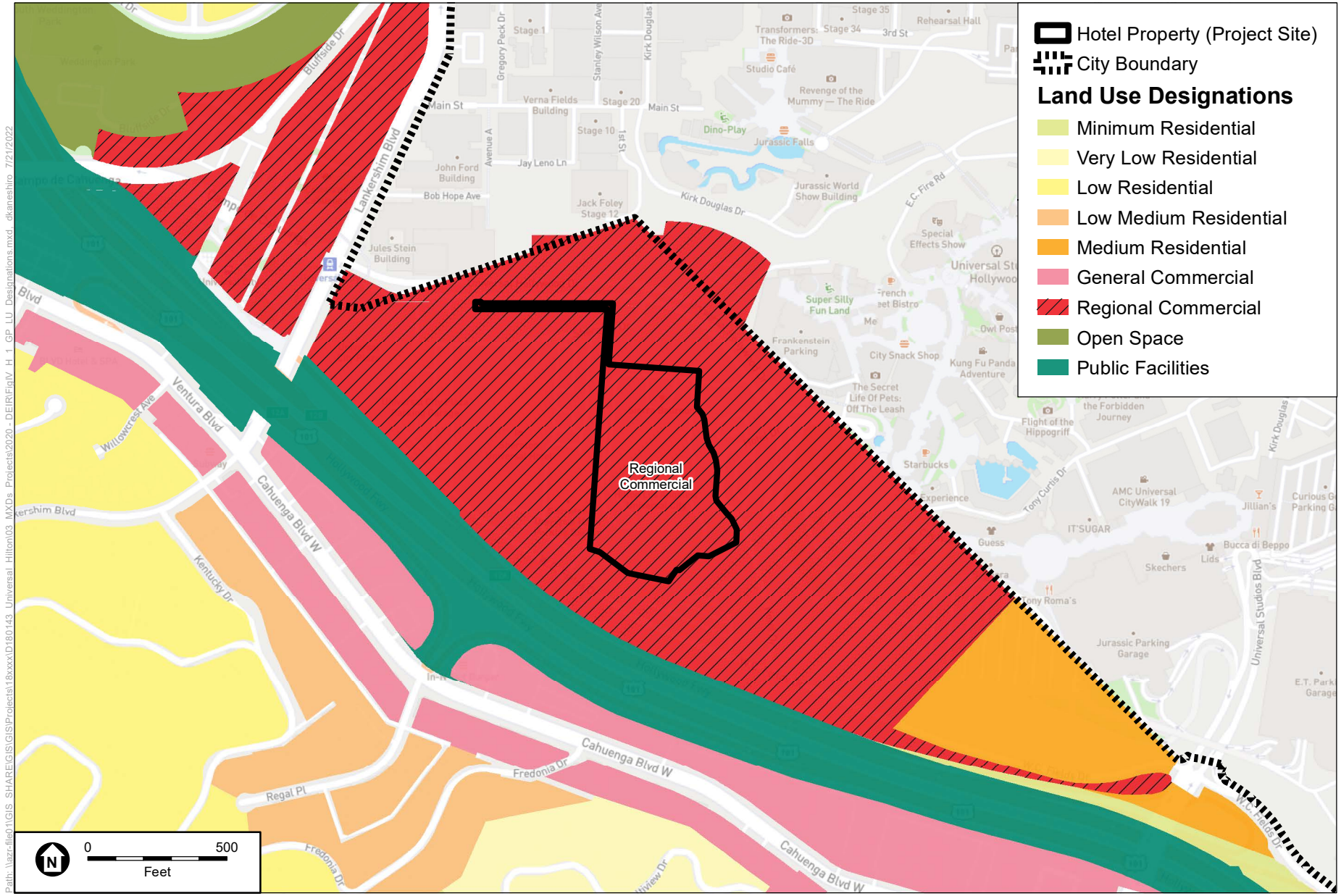
This General Plan Element includes policies pertaining to the arrangement of land uses within the City related to public health hazards, and which reinforce other State, regional, and local policies which call for improvements to air quality, reducing GHGs, protection from hazards and hazardous materials, and reductions in vehicle trips.

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

The Project Site is located within the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Community Plan (Community Plan) Area . The Community Plan was adopted in 1998, and serves as the land use element of the General Plan applicable to the five community subareas for the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Area. The Community Plan implements the Framework Element and includes land use designations, density limits, building heights and other provisions to implement the development that supports the City's policies and development vision for the future.

The land use policies and standards of the Framework Element and the other General Plan elements are implemented at the local level through the community planning process. Community plans are oriented toward specific geographic areas of the City, defining locally the Framework Element's more general policies and programs and are intended to promote an arrangement of land uses, streets, and services that will encourage and contribute to the economic, social, and physical health, safety, welfare, and convenience of the people who live and work in the community. Goals, objectives, policies, and programs are created to meet the existing and future needs of the community. As shown in **Figure IV.H-1**, *General Plan Land Use Designations*, the Project Site is designated Regional Commercial (Pre-Framework). The Regional Commercial designation corresponds to the Regional Center Commercial designation of the Framework Element. The City commenced preparation of an update to the Community Plan in 2018. The update to the Community Plan is still in progress.[6]

6 https://planning.lacity.org/plans-policies/community-plan-update/southeast-valley-community-plan-update, accessed August 26, 2022.



SOURCE: City of Los Angeles, 2015.

Hilton Universal City Expansion Project

Figure IV.H-1
General Plan Land Use Designations

The Community Plan states that commercial land use in the Community Plan Area is considered a vital component of the community. The predominant land use pattern is mainly strip commercial developed on shallow lots with limited on-site parking. The Community Plan encourages mixed-use projects in certain commercially designated areas, such as in pedestrian oriented districts and in transit oriented districts. The policies set forth in the Community Plan support a land use pattern that would reduce requirements for infrastructure expansion and encourage the use of alternative transportation systems and other energy saving measures. Projects that are consistent with the policies of the Community Plan would, thus, result in reduced VMT, GHG, and other environmental effects.

(b) City of Los Angeles Municipal Code

All development activity on the Project Site is subject to the City of Los Angeles Municipal Code (LAMC), particularly Chapter 1, General Provisions and Zoning, also known as the City of Los Angeles Planning and Zoning Code. The LAMC defines the range of zoning classifications throughout the City, provides the specific permitted uses applicable to each zoning designation, and applies development regulations to each zoning designation.

As shown in Figure II-3, *Zoning of Project Site and Surrounding Area*, in Chapter II, *Project Description*, of this Draft EIR, the Project Site has three zoning designations. The central portion of the Project Site, where the Existing Hotel Building and Ancillary Hotel Building are located, is zoned C2-1 (Commercial Zone, Height District 1). The C2 Zone permits a range of commercial uses, including hotels and apartment hotels. Within Height District 1, the C2 Zone allows unlimited building heights and establishes a maximum FAR of 1.5:1. In addition, it should be noted that the Community Plan General Plan Land Use Map includes Footnote No. 5 for the Project Site, which denotes the entire Project Site as Height District 2. Within Height District 2, the C2 Zone allows unlimited building heights and establishes a maximum FAR of 6:1.

The portion of the Project Site peripheral to these buildings is assigned a zoning designation of PB-1 (Parking Building, Height District 1). The PB Zone permits surface parking and structured automobile parking, including structures which are attached to or integrated with buildings in other zones provided that certain provisions are met. Within Height District 1, the PB Zone permits a maximum of two stories but does not specify a maximum height. A small trapezoidal area that forms the southern portion of the Project Site, (specifically the landscaped engineered hillside), as well as a thin strip along Universal Hollywood Drive are zoned RE15-1-H (Residential Estate Zones, Height District 1, Hillside Area). The RE15 Zone is primarily intended for the development of single-family homes and parks/playgrounds with a minimum lot area of 15,000 square feet. Within Height District 1, the RE15 restricts development to a maximum height of 36 feet. As noted above, the Community Plan General Plan Land Use Map includes a footnote that denotes the entire Project Site as Height District 2, which applies to the portions zoned PB and RE15 as well.

(c) Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the Framework Element's urban design principles and are intended to be used by City of Los Angeles Department of City Planning staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the Framework Element and Community Plans. By offering more direction for proceeding with the design of a project, the Citywide Design Guidelines illustrate options, solutions, and techniques to achieve the goal of excellence in new design. The Citywide Design Guidelines, which were initially adopted by the City Planning Commission in July 2013 and updated in October 2019, are intended as performance goals and not zoning regulations or development standards and, therefore, do not supersede regulations in the LAMC. The guidelines "carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions" and are organized in relation to Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design. The Citywide Design Guidelines incorporate the goals of the previous Walkability Checklist and interact with other guidelines such as those found in Community Design Overlays.

(d) Transit Priority Area

The Project Site is located within a Transit Priority Area (TPA), under City of Los Angeles ZI 2452. ZI 2452 provides that visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or other aesthetic impacts as defined in the City's Threshold Guide shall not be considered an impact for infill projects within a TPA. However, this regulation does not limit the ability of the City to regulate or study aesthetics related to impacts pursuant to other land use regulations found in the LAMC or the City's General Plan or specific plans. As discussed in ZI 2452, the limitation of aesthetic impacts pursuant to PRC Section 21099 does not include impacts to historic or cultural resources, which would be evaluated regardless of project location. The Project Site is mapped as a TPA in the map accompanying ZI 2452 and is further designated as a TPA in the City's ZIMAS data base.[7]

b) Existing Conditions

(1) Project Site

The approximately 7.26-acre Project Site is located west of the intersection of Universal Hollywood Drive and Hotel Drive in Universal City to the north of US-101 (Hollywood Freeway). The Project Site is comprised of one parcel (APN 2424-044-022 with a corresponding address of 555 Universal Hollywood Drive) and is located in the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan Area of the City of Los Angeles.

7 City of Los Angeles, Department of City Planning, Zimas database. Available at: http://zimas.lacity.org/. Accessed May 6, 2020.

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

The Project Site is developed with the 24-story Existing Hilton Hotel Building, a one- and two-story Existing Ancillary Hotel Building, Existing Outdoor Pool Area, and a three-level parking garage. The Existing Hotel Building contains 495 guestrooms and lobby. The Existing Hotel Building is accessed via a motorcourt and porte cochere entryway, referred to as the South Plaza. The Existing Ancillary Hotel Building, located to the north of the Existing Hotel Building, includes a lobby, gift/sundry shop, Café Sierra Restaurant, the Atrium Lounge, a lobby bar, a small coffee shop, other atrium areas, and meeting and banquet rooms. The Existing Ancillary Hotel Building is accessed via a porte cochere and landscaped parking plaza (the North Plaza). An outdoor patio/meeting/event area is located at the west side of the North Plaza. Total floor area for the Existing Hotel Building and Existing Ancillary Hotel Building is 397,521 square feet.

The North Plaza, the Existing Ancillary Hotel Building, internal driveway, and South Plaza are located atop a three-level parking garage. Overall, the Project Site currently contains a total of 652 vehicle spaces.

An internal driveway connects the North Plaza to the South Plaza. To the south of the Existing Hotel Building is the Existing Outdoor Pool Area, which consists of a pool, pool deck, spa, pool bar and grill, and ornamental landscaping.

(2) Surrounding Uses

As shown on Figure II-2, *Project Vicinity Map*, in Chapter II, *Project Description*, of this Draft EIR, the Project Site and vicinity are urbanized and generally built out. Also, please refer to Figure II-25, *Project Rendering - Northeasterly View*, and Figure II-26, *Project Rendering - Southeasterly View*, in Chapter II, *Project Description*, which show the future Project within the existing, off-site setting. The Project Site is located in an active area that serves as both a commercial center for Studio City and the surrounding communities and as an entertainment center of regional importance. The Project Site is bordered on the north by an undeveloped parcel (periodically used for the temporary storage of trailers) and Universal Hollywood Drive; on the east by a surface parking lot operated by Universal Studios Hollywood, Hotel Drive, an undeveloped hillside parcel, and Universal Studios Hollywood; on the south by an undeveloped parcel and a shuttle parking lot (both owned and maintained by Universal Studios Hollywood); and on the west by the Sheraton Universal Hotel, which consists of a 20-story hotel building at the center of the property, with hotel-related uses surrounding the tower, including a three-level parking structure located adjacent to the Project Site. The 36-story Universal City Plaza Office Building, which fronts on Lankershim Boulevard, is located approximately 0.2 miles to the west, west of the Sheraton Universal Hotel. W.C. Fields Drive is located approximately 130 feet

south of the Project Site and provides vehicle access to the Project Site via Hotel Drive and Universal Hollywood Drive as an alternate arrival and exit. A landscaped roadway shoulder and the travel lanes of the Hollywood Freeway are located south of W.C. Fields Drive, approximately 130 feet south/southwest of the Project Site. South of the Hollywood Freeway is the Cahuenga Boulevard corridor, which consists of one- to three-story commercial uses. Further south, land uses consist of the single-family residential homes of the Cahuenga Pass foothills.

The Universal Hilton Hotel is the closest hotel to Universal Studios Hollywood and Universal CityWalk, both of which are located across Universal Hollywood Drive from the Project Site. Both entertainment venues are part of the larger Universal City, which consists of a number of interrelated entities that have evolved because of their association with the entertainment industry, including Universal Studios Hollywood, Universal CityWalk, and the facilities that comprise Universal Studios, with soundstages, backlot sets, and offices largely occupied by entertainment-related companies. The majority of Universal City is located within unincorporated Los Angeles County. The unincorporated Los Angeles County island is just north and east of the Project Site, which is also generally north and east of Universal Hollywood Drive.

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

Land uses to the south of the Project Site include single-family residential neighborhoods in the Hollywood Hills and accessed via Barham Boulevard. Land uses to the south and west of the Project Site, to the south of the Hollywood Freeway, include multi-family and commercial uses along Cahuenga Boulevard, between Lankershim Boulevard and Barham Boulevard. Single family residential neighborhoods within the Hollywood Hills are located to the south of Cahuenga Boulevard.

Land uses to the north of the Project Site, north of Lankershim Boulevard, include Campo de Cahuenga Park, the Metro B Line (Red Line) Universal City/Studio City Station, and the park-and-ride lot for the Metro station. Campo de Cahuenga contains

a historical museum, replica of the original adobe ranch house, landscaped courtyard, and tiled outline of the original adobe site, which extends into Lankershim Boulevard. To the north of the park-and-ride lot is S. Weddington Park, which provides a perimeter walking path and ballfield. Residential neighborhoods are located to the north of the park. The east side of Lankershim Boulevard is lined with studio-related commercial uses. This area is generally defined at its north edge by the concrete-lined Los Angeles River channel.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the state CEQA Guidelines, a project would have a significant impact related to land use and planning if it would:

a) Physically divide an established community; or

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

For this analysis, the Appendix G thresholds listed above are relied upon. The analysis utilizes factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G threshold questions. The factors used to evaluate land use impacts are listed below.

Land Use Consistency

- Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan or specific plan for the site; and
- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

Land Use Compatibility

- The extent of the area that would be impacted, the nature and degree of impacts, and the type of land uses within that area;
- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and
- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the proposed project.

b) Methodology

The analysis of potential land use impacts considers consistency of the Project with adopted plans, regulations, and development guidelines, and in some instances advisory guidance, that are applicable to the Project Site and the Project and that have been adopted for the purpose of avoiding or mitigating an environmental effect.

CEQA Guidelines Section 15125(d) requires that in describing the environmental setting, an EIR include a discussion of any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans. Separately, Appendix G recommends that a lead agency consider whether the project would cause a significant environmental impact due to a conflict with land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Importantly, a conflict between a project and an applicable plan is not necessarily a significant impact under CEQA unless the inconsistency will result in an adverse physical change to the environment that is a "significant environmental effect" as defined by CEQA Guidelines Section 15382. As provided in CEQA Guidelines Section 15126.2 "an EIR shall identify and focus on the significant effects of the proposed project on the environment." An excerpt from the legal practice guide, Continuing Education of the Bar, Practice Under the California Environmental Quality Act, Section 12.34 illustrates the point:

> *"An inconsistency between a proposed project and an applicable plan is a legal determination not a physical impact on the environment. …if a project affects a river corridor, one standard for determining whether the impact is significant might be whether the project violates plan policies protecting the corridor; the environmental impact, however, is the physical impact on the river corridor."*

Under state Planning and Zoning law (Government Code Section 65000 et seq.) strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests and agencies are given great deference to determine consistency with their own plans. A proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies. Generally, given that land use plans reflect a range of competing interests, a project should be compatible with a plan's overall goals and objectives but need not be in perfect conformity with every plan policy.

Project consistency with applicable policies that have in part been adopted for the purpose of avoiding or mitigating an environmental effect as set forth in SCAG's 2020–2045 RTP/SCS, the Framework Element, and Sherman Oaks-Studio City-Toluca Lake-Cahuenga Community Plan, is evaluated in detail in Appendix H*, Land Use Plans and Policies: Project Consistency Tables*, of this Draft EIR. The results and determination of whether the Project would cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect is provided in the impact analysis below. To the extent

that the Project's potential conflict with a plan, program, or policy is analyzed in another section of the EIR, that plan is not further discussed in this section. For example, consistency with transportation plans is analyzed in Section IV.K, *Transportation*.

c) Project Design Features

There are no Project Design Features that relate to land use.

d) Analysis of Project Impacts

Threshold a) Would the Project physically divide an established community?

As discussed in Section VI.6, *Impacts Found Not to Be Significant,* of this Draft EIR and in the Initial Study (**Appendix A** of this Draft EIR), the Project consists of infill development and would expand the existing hotel uses on the Project Site. The Project would promote the existing commercial character of the surrounding area and would not physically divide an established community and, therefore, a less than significant impact would occur with respect to Threshold (a). **No further analysis is required.**

Threshold b) Would the Project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

(1) Impact Analysis

The development of the Project would be subject to various land use plans, policies, and the development regulations in the LAMC's Planning and Zoning Code. The Project's consistency with the applicable City and regional regulations, plans, and policies are addressed below and include SCAG's 2020-2045 RTP/SCS, the City's Framework Element, the Community Plan, and the LAMC.

The Project's consistency with other elements of the City's General Plan are addressed in other relevant sections of this Draft EIR. Similarly, other plans that address the distribution of land use in the region and that are linked with the SCAG Plans are addressed in other sections of this Draft EIR. Specifically, Project consistency with the AQMP is analyzed in Section IV.A, *Air Quality;* Senate Bill (SB) 375 and SCAG's Sustainable Communities Strategy are discussed in Section IV.F, *Greenhouse Gas Emissions;* and transportation plans are discussed in Section IV.K, *Transportation*, of this Draft EIR.

(a) SCAG's 2020-2045 RTP/SCS

SCAG's 2020–2045 RTP/SCS incorporates several goals that are applicable to the Project and that would avoid or reduce the Project's environmental impacts. Table LU-1, *Project Consistency with the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy*, provided in Appendix H of this Draft EIR, compares the Project with applicable strategies of the 2020-2045 RTP/SCS.

According to the 2020-2045 RTP/SCS, the Project Site is located within a Priority Growth Area (PGA) and is considered both a TPA and HQTA due to its location within 0.25 miles of the Metro B Line (Red Line) Universal City/Studio City Station.[8,9] The Project, which would intensify development within a TPA/HQTA and walking distance from Universal Studios, would not conflict with strategies of the 2020-2045 RTP/SCS to emphasize land use patterns that facilitate multi-modal access to work, educational and other institutions. Because of the proximity to transit, the Project would also not conflict with strategies that plan for growth near transit investments and support implementation of first/last mile strategies. Access between the Project Site and the Metro B Line (Red Line) Universal City/Studio City Station is accommodated by a pedestrian bridge across Lankershim Boulevard and a broad landscaped sidewalk in which pedestrian activity would be encouraged. This would be consistent with the 2020-2045 RTP/SCS's first/last mile strategy (a safe pedestrian route between the Project Site and the transit station). The Project would not conflict with strategies to prioritize infill and redevelopment of underutilized land to accommodate new growth and to increase amenities and connectivity in existing neighborhoods. Because the Project would represent an infill development and intensification of an existing developed site within a TPA/HQTA, the Project would increase pedestrian activity and connectivity in the existing area.

The Project would not conflict with RTP/SCS strategies that encourage design and transportation options that reduce the reliance on and number of solo car trips. The Project would intensify development in a TPA/HQTA and would provide bicycle parking spaces and bicycle amenities. These facilities would encourage employee cycling to work and the use of bicycle by guests for sight-seeing and other regional trips, thus, reducing the reliance on and number of solo car trips.

The Project would not conflict with strategies that support development of local climate adaptation and hazard mitigation plans, as well as improve community resiliency to climate change and natural hazards. The location of the Project within the TPA/HQTA would contribute to the reduction in VMT and GHG emissions. In addition, the Project would protect water resources by incorporating a variety of water conservation features pertaining to water-efficient fixtures for the entire Project; landscaping and irrigation features, such as use of artificial turf, California Friendly® plants, and drip/subsurface irrigation (micro-Irrigation); and pool-related features, such as a leak-detection system and water-saving pool filters. The Project's water conservation features are included as Project Design Feature WS-PDF-1.

8 SCAG. 2022. Priority Growth Areas. SCAG Region. Priority Growth Areas (PGA) - SCAG Region | Regional Data Platform (RDP) Home Southern California Association of Governments Accessed September 19, 2022.

9 Transit Priority Areas (TPAs) are defined by SCAG as an area within one-half mile of a major transit stop that is existing or planned. High Quality Transit Areas (HQTAs) are defined by SCAG as generally a walkable transit village or corridor, consistent with the adopted RTP/SCS, and is within one half-mile of a well- serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.

The Project would not conflict with strategies that support local policies for renewable energy and green building design. The Project would be designed to meet the California Green Building Standards (CALGreen) Code as adopted, or the Los Angeles Green Building Code, which was amended to incorporate various provisions of the CALGreen Code, through the incorporation of green building techniques and other sustainability features, including the use of materials and finishes that emit low quantities of volatile organic compounds (VOCs); the installation of heating, ventilation, and air conditioning (HVAC) systems that utilize ozone-friendly refrigerants; high-efficiency appliances; stormwater retention; and the provision of bicycle parking and other amenities for bicyclists, and electric vehicle charging stations.

The Project would not conflict with strategies that promote more resource efficient development focused on conservation, recycling and reclamation by including design features that would contribute to energy efficiencies. Recycling would include a program for all disposable products from rooms including soap, shampoo, kitchen glass and plastic. Conservation efforts would include water efficient plumbing fixtures and low-flow shower heads, leak detection system and water-saving pool filters for the swimming pool, artificial turf, a drip/subsurface Irrigation (Micro-Irrigation) system, and retention of surface water runoff in accordance with LID requirements.

Based on the above, because the Project would not conflict with applicable goals and strategies of the 2020-2045 RTP/SCS, impacts with respect to this adopted plan would be less than significant.

(b) City of Los Angeles General Plan Framework Element

As described above, the Framework Element establishes Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services; however these land use policies do not override or supersede the more detailed community plans and specific plans.

Table LU-2, *Project Consistency with the General Plan Framework Element*, provided in Appendix H of this Draft EIR, evaluates the consistency of the Project with objectives and policies of the Framework Element. The following summarizes the results of Table LU-2.

The Project would intensify commercial uses in a designated Regional Center served by public transit. The Project's improvements would be compatible with the entertainment and commercial environment in the Universal City area.

The Project would be consistent with Framework Element goals to achieve a balanced and diverse distribution of land uses that contributes to the City's long-term fiscal and economic viability by continuing and expanding the existing hotel use and maximizing the use of the Project Site by accommodating a higher density at the Project Site. The Project is located in a TPA and near the Metro B Line (Red Line) Universal City/Studio City Station, reducing the need for vehicle use and reducing traffic congestion. The proximity of the Project to transit would be consistent with Framework Element policies to promote an improved quality of life by facilitating a reduction of vehicle trips, VMT, and air pollution.

The Project would not conflict with the Urban Form and Neighborhood Design objective to reinforce existing Regional Centers that accommodate a broad range of users that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.

It would also be consistent with objectives to encourage proper design and effective use of the built environment to help increase personal safety at all times of the day by continuing the existing comprehensive security program, 24 hours per day/seven days per week, to ensure the safety of hotel guests and visitors. Accordingly, and as further described in Appendix H of this Draft EIR, the Project would not conflict with applicable objectives and policies of the Framework Element, which were adopted for the purpose of avoiding or mitigating an environmental effect, impacts with respect to the Framework Element would be less than significant.

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

Table LU-3, *Project Consistency with the* Sherman Oaks-Studio City-Toluca Lake-Cahuenga *Community Plan*, provided in Appendix H of this Draft EIR, includes a detailed evaluation of the consistency of the Project with objectives of the Community Plan. The following summarizes the results of Table LU-3.

The Project Site is consistent with Community Plan's Regional Center Commercial (Pre-Framework) designation.[10] The Project would be consistent with the goals of the Community Plan to conserve and strengthen the Community's commercial sector, to enhance the visual character of the Project Site, and to provide on-site open space and landscaping. In addition, by maintaining existing security personnel and providing well-lit public and semi-public spaces, as well as active security features, the Project would support the Community Plan's goals with respect to police and fire services. The Project would represent the expansion of an existing hotel that would increase density and human activity within a designated TPA and within a quarter-mile and easy pedestrian access of the Metro B Line (Red Line) Universal City/Studio City Station. As such, the Project would be consistent with the transportation goals of the Community Plan to increase use of public transit for work trips and non-work trips and to encourage alternative modes of transportation to the use of single occupancy vehicles in order to reduce trips. Accordingly, and as further described in Appendix H of this Draft EIR, the Project would not conflict with applicable policies of the Community Plan, adopted for the purpose of avoiding or mitigating an environmental effect related to safety and reduced vehicle trips. Therefore, impacts with respect to Community Plan would be less than significant.

[10] City of Los Angeles Department of City Planning, Sherman Oaks-Studio City-Toluca Lake-Cahuenga Community Plan, General Plan Land Use Map, Available at: https://planning.lacity.org/complan/valley/PDF/shrplanmap.pdf. Accessed May 6, 2020.

(d) City of Los Angeles Municipal Code

The Project is located within the C2-1 and PB-1 zoned areas of the Project Site. The southern section of the Project Site, an approximately 11,000 square-foot parcel within the steep, south portion of the Project Site, and a thin strip of land along Universal Hollywood Drive, are located within the RE-15 zone, a single-family residential zone. Neither of these RE15 zoned parcels could be developed with residential uses since neither meets the minimum lot size of 15,000 square feet. Therefore, the proposed zone change would not reduce the development potential of the Project Site. In addition, PB zoning is not required to ensure the use of the Project Site to provide on-site parking consistent with the requirements of the LAMC. Therefore, the zone change from PB and RE15 to C2 would create uniform zoning for the hotel use, including the existing three-level parking garage, of the entire Project Site. The change in the underlying zoning would not result in any significant environmental effects with respect to the purposes of existing zoning and the Regional Center Commercial designation of the Project Site. As such, the zone change to C2 over the entire site would not conflict with the designated uses within the existing zoning designation or cause a significant environmental impact due to a conflict with the LAMC.

However, although the existing Height District 1, allows unlimited building heights, it establishes a maximum FAR of 1.5:1. The Hotel Expansion Building and Meeting Room Addition would add approximately 299,088 square feet of additional floor area on the Project Site. Implementation of the Project would result in a total 696,609 square feet of floor area, and a resulting FAR of approximately 2.20:1 for the Project Site. Pursuant to LAMC Section 12.32-F, the Applicant is seeking a Height District Change for the entire Property from Height District No. 1 to Height District No. 2, which would allow the proposed FAR of 2.20:1. The Project's construction activities would result in significant and unavoidable noise impacts (see Section IV.I, *Noise*, of this Draft EIR). However, construction noise impacts are based on maximum daily construction noise levels, such as those days occurring demolition and excavation, and are not directly related to the scale, size or floor area of the Project. Because the Project's maximum daily construction activities would occur without the FAR increase (i.e., building demolition and parking garage excavation), the Height District Change would not result in a new or substantially increased significant environmental impact due to a conflict with the LAMC.

The Project Site is not located in the Universal City Sign District and no off-site advertising signage is proposed. The Project would retain the existing red, channel-letter "Hilton" sign atop the Existing Hotel Building's northwestern and southeastern façades. All new signage would be consistent with the requirements of the LAMC, and the Project would not result in a significant impact (such as light and glare) as a result of a conflict with the LAMC.

The Project Site is also located within a TPA per City of Los Angeles ZI 2452. This Zoning Information File provides exemptions to aesthetics and parking within TPAs pursuant to CEQA. The Project's consistency with policies related to TPAs is provided above in Threshold 1(a), under the discussion of the SCAG 2020-2045 RTP/SCS.

The Project is also requesting Site Plan review pursuant to LAMC Section 16.05, haul route approval, and Conditional Use Permits for: 1) the sale or dispensing of alcoholic beverages for on-site consumption within the Hotel's guest rooms through room service and in-room control access cabinets (mini-fridges), at the restaurant dining (including a bar) and pool area on Level 18, restaurant (including a bar) on Level 3, the pool restaurant and bar on the Basement Level, Meeting Room Addition, and spa on Level 1 pursuant to LAMC Section 12.24 W.1, a; and 2) to allow for dancing and live entertainment during events within the Meeting Room Addition, areas adjacent to the lobby/lounge area on Level 4, and area adjacent to the proposed restaurants/dining areas on Level 3 and Level 18 of the Hotel Expansion Building pursuant to LAMC Section 12.24 W.18. The analysis throughout this Draft EIR includes an assessment of the Project as proposed with 395 new hotel guest rooms. Environmental impacts associated with the restaurants, bars, lounge space, and pool uses, including operational outdoor noise and traffic impacts, have been analyzed in this Draft EIR. Refer to Section IV.I., *Noise*, and Section IV.K, *Transportatio*n, for a discussion of operational noise and traffic impacts, respectively. As discussed therein, operational noise and traffic impacts would be less than significant. Therefore, the Project's requested Site Plan Review, haul route approval, and Conditional Use Permits would not result in a significant impact as a result of a conflict with the LAMC.

Therefore, the Project would not result in significant environmental impacts related to inconsistency with the LAMC's land use regulations. Impacts with respect to the land use provisions of the LAMC would be less than significant.

(e) Citywide Design Guidelines

As described above, while the Citywide Design Guidelines, do not supersede regulations in the LAMC, they provide performance goals and are intended to be used in evaluating project applications. Central to the Citywide Design Guidelines are three design approaches, namely Pedestrian-First Design, 360 Degree Design, and Climate-Adapted Design. The Project's consistency with these approaches is described further below.

(i) Pedestrian-First Design

Citywide Design Guidelines 1, 2, and 3 are related to the provision of Pedestrian-First Design and are summarized as follows:

- **Guideline 1** aims to promote a safe, comfortable, and accessible pedestrian experience for all.
- **Guideline 2** recommends the creation of an inviting and comfortable public right-of-way.
- **Guideline 3** recommends projects engage with streets and public spaces and maintain human scale.

Access to the Project Site is designed to be pedestrian friendly and promote safe access routes from the nearby transit and commercial uses. Existing pedestrian access to the Universal Studios theme park would remain similar to existing conditions with guests

currently walking and/or taking the Universal Studios Hotel Shuttle to the Park or CityWalk. However, for those wishing to walk, existing identification and wayfinding signage at the driveway entrance along Universal Hollywood Drive would remain. New wayfinding signage would be added to the interior of the Project Site to assist guests and visitors on finding the new main entrance to the Hotel, which would be consistent with Guideline 1. Additionally, as a potential off-site improvement, a new dedicated pedestrian pathway from the Project Site to Universal Hollywood Drive may be constructed along the south side of the driveway entrance. If constructed, the pedestrian access would provide an additional and more direct path for pedestrians accessing the Hotel from Universal Hollywood Drive. Furthermore, the Project would provide safe spaces by continuing the Hotel's comprehensive security program, 24 hours per day/seven days per week, to ensure the safety of Hotel guests and visitors, consistent with Guideline 1. The Hotel grounds provide well-lit public and semi-public spaces and active security features, including coverage and monitoring of key areas through closed-circuit television (CCTV).

In addition, the Project does not include any alterations to the existing public right-of-way. Therefore, the Project would be consistent with Guideline 2.

Architectural Project renderings are shown in Figures II-25 through II-27 in Chapter II, *Project Description*. As for the pedestrian experience at the podium level (Level 4), as demonstrated in the renderings, the base of the Hotel Expansion Building would be differentiated from the upper levels by expansive glass and a long canopy that would provide a smaller sense of scale for pedestrians and be consistent with Guideline 3 of the Citywide Design Guidelines.

(ii) 360 Degree Design

Citywide Design Guidelines 4, 5, 6, and 7 are related to the provision of 360 Degree Design and are summarized as follows:

- **Guideline 4** seeks to encourage projects to respect the surrounding context.
- **Guideline 5** recommends expressing a clear and coherent architectural idea.
- **Guideline 6** recommends the provision of amenities that support community building and inviting and comfortable user experiences.
- **Guideline 7** aims to protect site users through carefully arranged design.

The Project would be consistent with the architectural and visual character of the existing built environment of the Project Site and adjacent uses, including the Existing Hotel Building and adjacent Sheraton Hotel. In addition, the 18-story Hotel Expansion Building would be compatible with the existing high-rise character of the City's Universal City sector by contributing to the density and height variety of the existing high-rise cluster. In addition to multiple-story buildings, existing development in the vicinity and the Project provide deep setbacks from adjacent streets. The design of the Hotel Expansion Building also includes a bend in the middle of the tower, not unlike the

Comcast NBC Universal building nearby, making the building appear more slender and vertical, increasing the sense it is part of an urban center. Therefore, the Project would be consistent with Guideline 4, which seeks to encourage projects to respect the surrounding context.

The Project would be designed with a modern diamond-shaped architectural massing that would complement the Existing Hotel Building and the Existing Ancillary Hotel Building and creating a single hotel campus with two distinct buildings. In addition, the Project's landscaping would include a comprehensive replacement and upgrade that would compliment the site's design. Therefore, the Project would be consistent with Guideline 5, expressing a clear and coherent architectural idea.

Furthermore, the Project would not encroach upon public open space resources and would incorporate landscaped open space and a rooftop restaurant and landscaping where the public could enjoy vistas of the City's open spaces. The Project also proposes various recreational amenities for use by hotel guests including a new outdoor Pool Deck with swimming pool and jacuzzi on the Basement Level of the Hotel Expansion Building, plus outdoor seating and a deck area for hotel guests. A Rooftop Pool Deck would provide an additional pool for hotel guests. In addition, a fitness center would be provided on Level 2 for use by hotel guests and a spa would be provided on Level 1 that would be open to both hotel guests and up to 250 non-hotel guest private members. Therefore, the Project would provide recreational facilities and would be consistent with Guideline 6 of the Citywide Design Guidelines, through the creation of desirable environments where people want to spend time engaging in social, civic, and recreational activities.

The Project is consistent with Guideline 7, which recommends reducing exposure to any type of nuisance because the Project Site is located adjacent to the Hollywood Freeway. The Project includes landscaping, including a large number of trees along the south side of the property between the Hotel Expansion Building and the freeway. In addition, the Project also places non-habitable uses such as parking structures, mechanical equipment, and utilities adjacent to sources of noise and/or pollutants. Project mechanical electrical, and plumbing equipment spaces are proposed on the Basement Level and Levels 1, 2, and 18/Roof of the Hotel Expansion Building. The Project is therefore consistent with Guideline 7.

(iii) Climate-Adapted Design

Citywide Design Guidelines 8, 9, and 10 are related to the provision of Climate-Adapted Design and are summarized as follows:

- **Guideline 8** aims to protect natural resources and features.
- **Guideline 9** recommends site configuration, building massing and orientation to lower energy demand and to increase comfort.
- **Guideline 10** aims to increase opportunities to capture stormwater and promote habitat.

The Project would replace and upgrade landscaping with plant materials and trees, maintaining the limited natural resources present on this existing developed site. Therefore, the Project would be consistent with Guideline 8.

The Project would be designed and operated to comply with applicable requirements of the 2019 CALGreen Code, the City's Green Building Code, Los Angeles Building Code, LAMC, and compliance with the United State Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Gold certification or equivalent standards. The Project would incorporate green building techniques and other sustainability features, such as utilization of materials and finishes that emit low quantities of VOCs; installation of heating, ventilation, and air conditioning systems that use ozone-friendly refrigerants; the installation of heat pumps; use of high-efficiency appliances; installation of stormwater retention areas; incorporation of water conservation features; the provision for on-site electric vehicle (EV) charging stations; and the provision of bicycle parking and other amenities for bicyclists. These measures would be consistent with Guideline 9 of the Citywide Design Guidelines.

The Project would replace and upgrade landscaping with a landscape palette consisting of plants adapted to the Southern California climate that have low to medium water demand. The final planting design would include an irrigation system that complies with the State of California Model Water Efficient Landscape Ordinance (MWELO). A smart irrigation controller with weather sensing technology along with a high-efficiency drip irrigation system would be used to apply water efficiently and effectively to new planting areas to reduce overall water demand during periods of drought. Additionally, as mentioned in Section IV.G, *Hydrology and Water Quality*, the Project would implement capture and reuse as a best management practice for managing stormwater runoff in accordance with current Low Impact Development (LID) requirements. Therefore, the Project would be consistent with Guideline 10.

The Project would not result in significant environmental impacts related to inconsistency with the Citywide Design Guidelines because the Project is consistent with each of the guidelines. Impacts with respect to consistency with the Citywide Design Guidelines would be less than significant.

(f) Conclusion

Based on the analysis of Project consistency with policies of SCAG's 2020-2045 RTP/SCS, the City's Framework Element, and the Community Plan, as well as land use regulations of the City of Los Angeles Planning and Zoning Code and the Citywide Design Guidelines, the Project would be consistent with and not conflict with the relevant land use policies adopted for the purpose of avoiding or mitigating a significant environmental effect. 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. The Project would be consistent with the General Plan's Regional

Center Commercial land use designation. **Therefore, with the approval of the proposed entitlements, the Project would be consistent with and not conflict with applicable land use plans, policies, and regulations, and impacts would be less than significant.**

(2) Mitigation Measures

Impacts regarding land use and planning were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Impacts regarding land use and planning were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

As analyzed above, the Project would be consistent with and not conflict with applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect.

(1) Impact Analysis

Chapter III, *Environmental Setting*, of this Draft EIR, lists fourteen (14) related projects that are planned or are under construction within the City of Los Angeles and generally within the built-out Sherman Oaks-Studio City-Toluca Lake-Cahuenga Community Plan area. There is also one related project within the adjacent County of Los Angeles. The list of related projects reflects projects known as of August 2022. The related projects within the City of Los Angeles are located within approximately 1.15 miles of the Project Site. More specifically, five of the related projects (Related Project Nos. 2, 3, 4, 5, and 7) are located between the Los Angeles River and State Route 134, two of the related projects (Related Project Nos. 8 and 9) are located south of the Los Angeles River and west of Vineland Avenue, and Related Project No. 6 is located on the south side of the Hollywood Freeway to the east of Barham Boulevard. Six of the related projects (Related Project Nos. 10, 11, 12, 13, 14, and 15) are located east and south of the Project Site south of the Hollywood Freeway. Related Project No. 1, which is closest to the Project Site, is located to the east of the Project Site within the County and would include a mix of studio, office, entertainment, and hotel uses.

The Project, together with the related projects, would provide a range of uses, including residential, studio, office, entertainment, hotel, retail, restaurant, and car wash uses. The variety of uses and densities reflected in the related projects would be consistent with the general intent of the applicable policies and objectives of the Framework Element, Community Plan and SCAG's 2020-2045 RTP/SCS plan. The related projects are in-fill in nature and, while increasing density in the area, would not alter the basic land use patterns and would contribute to the diversity of uses, as well as providing needed

housing in the area. Related projects are subject to CEQA review and review by City regulatory agencies. Most notably, related projects seeking increases in permitted densities and buildings seeking increases in densities are subject to review by the City Planning Commission or the City Council on appeal and review for consistency with plan provisions.

As discussed above, the Project would be consistent with the regulatory framework and its implementation would not have an adverse effect on the implementation of plans and regulations in the Project Site vicinity.

Therefore, the Project's contribution to cumulative impacts would not be cumulatively considerable. Cumulative land use impacts resulting from the combination of the Project with other pending projects in the vicinity would be less than significant.

(2) Mitigation Measures

Cumulative impacts regarding land use and planning were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Cumulative impacts regarding land use and planning were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.