



Hilton Universal City Project

Environmental Case: ENV-2017-5424-EIR
State Clearinghouse No.: 2020100057

Project Location: 555 E. Universal Hollywood Drive, Los Angeles, California 91608

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

Council District: 4 — Raman

Project Description: The Hilton Universal City Project (Project) involves the construction of an approximately 299,088 square-foot, 18-story Hotel Expansion Building addition to the existing 24-story Hilton Universal City Hotel. The Hotel Expansion Building would be comprised of 395 guestrooms, a spa, three restaurants, an indoor/outdoor bar, two pools, a single-level lobby lounge/bar connecting to the existing hotel building, a meeting room addition to the ancillary building, and an expansion of the existing three-level parking garage. Upon completion, the Project would provide 890 guestrooms and 696,609 square feet of floor area, resulting in a floor area ratio (FAR) of 2.2:1 for the 7.26-acre site.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

Environmental Science Associates (ESA)

APPLICANT:

Hillcrest Real Estate, LLC

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Acronyms and Other Abbreviations

Abbreviation	Definition
ADA	American with Disabilities Act
BACT	Best Available Control Technology
CARB	California Air Resources Board
CCTV	closed circuit television
CEQA	California Environmental Quality Act
CMP	Construction Management Plan
CTD	City Tourism Department
EIR	Environmental Impact Report
FHWA	Federal Highway Administration
HCM	Highway Capacity Manual
ITS	Intelligent Transportation System
LAMC	Los Angeles Municipal Code
LASAN	Los Angeles Sanitation, Wastewater Engineering Services Division
LDR	Local Development Review
LEED	Leadership in Energy and Environmental Design
MM	Mitigation Measures
MMP	Mitigation Monitoring Program
NOP	Notice of Preparation
PDF	Project Design Features
PRC	Public Resources Code
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
TDM	Transportation Demand Management
USEPA	United States Environmental Protection Agency
USGBC	United States Green Building Council
VICA	Valley Industry & Commerce Association
VTM	Vehicle Miles Traveled
WEAP	Worker Environmental Awareness Program
WESD	Wastewater Engineering Services Division

CHAPTER 1 – INTRODUCTION

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15089, subsequent to the circulation of a Draft Environmental Impact Report (EIR), the City of Los Angeles (City), the Lead Agency, must prepare a Final EIR before approving a project. The purpose of a Final EIR is to provide an opportunity for the lead agency to respond to comments made by the public and agencies regarding the Hilton Universal City Project's (Project) Draft EIR. Pursuant to CEQA Guidelines Section 15132, this Final EIR includes a list of persons, organizations, and agencies that provided comments on the Draft EIR; responses to comments received regarding the Draft EIR; and revisions to the Draft EIR. In addition, the Final EIR includes a Mitigation Monitoring Program (MMP).

This Final EIR constitutes the second part of the EIR for the Project and is intended to be a companion to the Draft EIR. The Draft EIR for the Project, which was circulated for public review and comment for a period of 60 days from November 16, 2023 through January 15, 2024, constitutes the first part of the EIR and is incorporated by reference and bound separately (refer to Volumes 1 through 6 of the Draft EIR).¹

1.1 Organization of the Final EIR

The Final EIR consists of the following four chapters and 2 appendices:

CHAPTER 1. INTRODUCTION

This chapter provides an introduction to the Final EIR.

CHAPTER 2. RESPONSES TO COMMENTS

This chapter presents a matrix of the parties that commented on the Draft EIR and the issues that they raised. This matrix is followed by verbatim numbered copies of the comments followed by numbered responses to each of the written comments made regarding the Draft EIR pursuant to CEQA Guidelines Section 15088. Copies of the full original comment letters responded to in this Final EIR are included in Appendix A, Original Draft EIR Comment Letters, of this Final EIR.

CHAPTER 3. REVISIONS, CLARIFICATIONS, AND CORRECTIONS TO THE DRAFT EIR

This chapter includes a list of revisions that have been made to the Draft EIR for the Project based on comments received from the public and agencies and other items requiring revisions.

¹ The hardcopy printed version of the Draft EIR was bound in 6 separate volumes.

These changes are minor and do not add significant new information that would affect the analysis or conclusions presented in the Draft EIR. Section 15088.5(a) of the CEQA Guidelines specifically states:

New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation includes, for example, a disclosure showing that:

- *A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
- *A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance.*
- *A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.*
- *The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.*

CEQA Guidelines Section 15088.5(b) provides that “[r]ecirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.”

As demonstrated in this Final EIR, the comments submitted on the Draft EIR, the responses to these comments, and the revisions, clarifications, and corrections presented in Chapter 3 of this Final EIR, do not constitute significant new information warranting recirculation of the Draft EIR as set forth in CEQA Guidelines Section 15088.5. Rather, the Draft EIR is comprehensive and has been prepared in accordance with CEQA and the CEQA Guidelines.

CHAPTER 4. MITIGATION MONITORING PROGRAM

This chapter provides the full Mitigation Monitoring Program (MMP) for the Project. The MMP lists the Project’s Mitigation Measures (MMs) and Project Design Features (PDFs) by environmental topic and identifies for each of the features and measures the applicable enforcement agency, monitoring agency, monitoring phase, monitoring frequency, and action indicating compliance.

This Final EIR also includes the following appendices:

A: Original Draft EIR Comment Letters

B: Linscott, Law & Greenspan, Engineers Response Memo, dated January 23, 2024

1.2 Public Review Process

Below is a general overview of the environmental review process for the Project, which was conducted in accordance with CEQA.

In accordance with CEQA, the environmental review process for the Project commenced with solicitation of comments from the identified responsible and trustee agencies, as well as interested parties on the scope of the Draft EIR, through a Notice of Preparation (NOP). The City prepared an Initial Study and circulated an NOP for public comment to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on October 6, 2020 for a 30-day public review period ending on November 4, 2020. In addition, a public scoping meeting was conducted on October 20, 2020. No public comments were received at the scoping meeting. The Initial Study, NOP and NOP comment letters are included in Appendix A of the Draft EIR.

Consistent with the requirements of CEQA Guidelines Section 15087 and 15105, the Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research, and was circulated for public review commencing on November 16, 2023 and ending on January 15, 2024, for a 60-day review period. The Draft EIR was made available for review on the City's website, the State Clearinghouse CEQAnet website, at the Department of City Planning, and at two public libraries. Following the Draft EIR public comment period, this Final EIR has been prepared and includes responses to the comments raised regarding the Draft EIR.

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CHAPTER 2 – RESPONSES TO COMMENTS

2.1 Introduction

Sections 21091(d) and 21092.5 of the Public Resources Code (PRC) and California Environmental Quality Act (CEQA) Guidelines Section 15088(a) govern the lead agency's responses to comments on a Draft EIR. CEQA Guidelines Section 15088(a) states that "[T]he lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The Lead Agency shall respond to comments raising significant environmental issues that were received during the noticed comment period and any extensions and may respond to late comments." In accordance with these requirements, this chapter provides responses prepared by the City of Los Angeles (City) Department of City Planning (Department of City Planning) to each of the written comments received regarding the Draft EIR.

Section 2.2, *Matrix of Comments Received on the Draft EIR*, includes a table that summarizes the environmental issues raised by each commenter regarding the Draft EIR. Section 2.3 *Responses to Comments*, provides the City's responses to each of the written comments raised in the comment letters received on the Draft EIR. Copies of the original comment letters are provided in Appendix A, Original Draft EIR Comment Letters, of this Final EIR.

2.2 Matrix of Comments Received on the Draft EIR

TABLE 2-1
COMMENTS RECEIVED IN RESPONSE TO THE DRAFT EIR

		Date Received	Project Description	Air Quality	Biological Resources	Cultural Resources	Greenhouse Gas Emissions	Hydrology/Water Quality	Land Use and Planning	Noise	Public Services	Transportation	Utilities	Support
Agencies														
AG 1	City of Los Angeles City Tourism Department Doane Liu, Executive Director Los Angeles Convention Center, 1201 S. Figueroa Street Los Angeles, CA 90015	December 18, 2023												X
AG 2	City of Los Angeles Department of Public Works Rowena Lau, Division Manager Wastewater Engineering Services Division (WESD) Bureau of Sanitation	January 9, 2024											X	

**TABLE 2-1
COMMENTS RECEIVED IN RESPONSE TO THE DRAFT EIR**

		Date Received	Project Description	Air Quality	Biological Resources	Cultural Resources	Greenhouse Gas Emissions	Hydrology/Water Quality	Land Use and Planning	Noise	Public Services	Transportation	Utilities	Support
AG 3	CA Dept. of Transportation (Caltrans) - District 7 Frances Duong, Acting LDR/CEQA Branch Chief Local Development Review (LDR) Branch, Division of Planning Mail Station 16 100 South Main Street Los Angeles, CA 90012	January 10, 2024										X		
Organizations														
ORG 1	Los Angeles/Orange Counties Building and Construction Trades Council Ernesto Medrano, Executive Secretary 1626 Beverly Boulevard Los Angeles, CA 90026-5784	November 21, 2023												X

TABLE 2-1
COMMENTS RECEIVED IN RESPONSE TO THE DRAFT EIR

		Date Received	Project Description	Air Quality	Biological Resources	Cultural Resources	Greenhouse Gas Emissions	Hydrology/Water Quality	Land Use and Planning	Noise	Public Services	Transportation	Utilities	Support
ORG 2	Valley Industry & Commerce Association Stuart Waldman, VICA President 16600 Sherman Way, Suite 170 Van Nuys, CA 91406	December 11, 2023												X
Individuals														
IND 1	Brandon Cane	November 20, 2023												X
IND 2	Corilyn Oliva	November 22, 2023												X
IND 3	Nicole King	November 29, 2023												X
IND 4	James Elemendorf	December 12, 2023												X
IND 5	Julio Lopez	December 13, 2023												X
IND 6	Mark Alcala	December 13, 2023												X

2.3 Responses to Comments

Comment Letter No. AG 1

Cris Villorante, Exec. Admin. Asst.
City Tourism Department
1201 S. Figueroa Street
Los Angeles, CA 90015
Received December 18, 2023

Comment No. AG 1-1

As Executive Director of the Los Angeles City Tourism Department (CTD), I would like to express our support for the Hilton Universal's proposed expansion project at 555 Universal Hollywood Drive. The project would further the City's goals of increasing tourism growth by adding more hotel rooms to meet future demand, which in turn increases economic development of the region and creates long-term benefits for our residents, businesses, and other stakeholders.

The mission of CTD is to enhance and increase Los Angeles' prominence as a world-class tourist and convention destination. CTD promotes policies that drive economic development, create jobs, and improve the experience visitors have when visiting the City's unique cultural, sports, entertainment, and leisure attractions. The Hilton Universal has been a staple of the San Fernando Valley for decades and is one of the largest hotels in the region. Operating at or near capacity year-round, the Hilton Universal's proposed expansion aligns with CTD's goals. By opening in advance of the 2028 Summer Olympics, the Hilton Universal's expansion will add desperately needed hotel rooms to the distinctive culture and character of Universal City.

As you may know, CTD recently completed the City's first Tourism Master Plan, which is a destination management plan that analyzes Los Angeles' tourism assets and looks at what infrastructure is required in order to handle the large increase in visitation expected in the upcoming years. The Tourism Master Plan contains many important recommendations to develop and position Los Angeles as a leading tourist destination. Understandably, one of the key recommendations is to identify and advocate for new hotel development opportunities.

The Hilton Universal Expansion project would deliver 395 new rooms, which would improve the City's hotel stock and be consistent with the goals of the Tourism Master Plan. Hotels are essential providers of high-quality jobs and account for a substantial part of the workforce in Los Angeles County. These entry-level, well-paying jobs lead to careers and economic stability.

Also, the project has the ability to improve the City's tax base and help Los Angeles recover from the economic effects of the pandemic. CTD welcomes projects willing to invest in the City and facilitate a post-pandemic recovery of the hospitality industry.

Accordingly, CTD feels that the Hilton Universal Expansion aligns with its mission, the City's major tourism-related initiatives, and the Tourism Master Plan, and thus encourages the City to approve the project and ensure that the applicant can feasibly develop it.

For the reasons noted above, and generally to advance the San Fernando Valley and the City of Los Angeles as a world-class destination, CTD enthusiastically supports the Hilton Universal Expansion project and looks forward to its approval and eventual opening.

Response to Comment No. AG 1-1

This comment expresses support for the Project and describes information contained in Chapter II, *Project Description*. Since this comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. AG 2

City of Los Angeles Department of Public Works

Rowena Lau, Division Manager

Wastewater Engineering Services Division (WESD) Bureau of Sanitation

Received January 9, 2024

Comment No. AG 2-1

This is in response to your November 16, 2023 Notice of Completion and Availability of Draft Environmental Impact Report for the proposed Hilton Universal City Project located at 555 Universal Hollywood Drive, Universal City, CA 91608. LA Sanitation, Wastewater Engineering Services Division has received and logged the notification. Upon review, there were no changes to the project and the previous response is valid. Please notify our office in the instance that additional environmental review is necessary for this project.

If you have any questions, please call Than Win at (323) 342-6268 or email at than.win@lacity.org.

Response to Comment No. AG 2-1

This comment indicates that the City's Sanitation, Wastewater Engineering Services Division (LASAN) has received and reviewed the NOCA and Draft EIR, and upon review, LASAN determined that there were no changes to the Project and LASAN's previous assessment of the Project remains valid (see Section IV.M.2 and Appendix M-1 of the Draft EIR, which includes the results of the LASAN preliminary wastewater analysis that the City's existing sewer system is able to accommodate the Project). This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. AG 3

CA Dept. of Transportation (Caltrans) - District 7
Frances Duong, Acting LDR/CEQA Branch Chief
Local Development Review (LDR) Branch, Division of Planning
Mail Station 16
100 South Main Street Los Angeles, CA 90012
Received January 10, 2024

Comment No. AG 3-1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The Hilton Universal City Project (Project) involves the construction of an approximately 300,000 square-foot, 18-story Hotel Expansion Building in addition to the existing 24-story Hilton Universal City Hotel. The Hotel Expansion Building would be comprised of 395 guestrooms, a spa, restaurant, indoor/outdoor bar, two pools, a single-level lobby connecting to the existing hotel building, a meeting room addition to the ancillary building, and a three-level expansion of the existing subterranean parking garage. Upon completion of the Project, the Hilton Universal City Project would provide 890 guestrooms and 697,521 square feet of floor area.

Response to Comment No. AG 3-1

This introductory comment provides an overview of the Project and does not raise an issue with the Draft EIR. This comment is noted by the Department of City Planning. As the comment does not raise any specific issues regarding the content or adequacy of the Draft EIR, no further response is warranted.

Comment No. AG 3-2

Caltrans is aware of the challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, all future developments should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing. Overall, the environmental report should ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

Response to Comment No. AG 3-2

This general comment notes Caltrans' recognition of regional transportation and congestion challenges and notes that Caltrans recommends prioritizing efficient modes of transport. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. AG 3-3

Mobility Plan

Mobility Plan 2035 includes numerous policies and programs that are applicable to development associated with the Project. Overall, the Project design and its features supporting multimodal transportation would not conflict with transportation policies, standards, or programs in Mobility Plan 2035 adopted to protect the environment and reduce VMT.

Response to Comment No. AG 3-3

This comment notes that the Project would not conflict with Mobility Plan 2035 or other transportation policies, standards, and programs adopted to protect the environment and reduce VMT, and does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. AG 3-4

Sherman Oak-Studio City-Toluca Lake-Cahuenga Pass Community Plan

The evaluation of the Project's consistency with the applicable policies and programs of the Community Plan involves determining whether there is any conflict. The analysis reveals that the Project aligns with all relevant policies and programs outlined in the Community Plan, indicating no conflicts.

Response to Comment No. AG 3-4

This comment notes that the Project substantially conforms with the applicable Community Plan and does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. AG 3-5

Additional Policies and Programs

- a. LADOT Manual of Policies and Procedures
- b. Vision Zero

- c. Plan for a Healthy Los Angeles
- d. Citywide Design Guidelines
- e. Mobility Hubs Reader's Guide
- f. Walkability Checklist

Overall, The [sic] Project is in alignment with programs, plans, ordinances, or policies related to the circulation system, encompassing transit, roadways, bicycle, and pedestrian facilities. These have been established to enhance mobility by providing alternatives to single-passenger vehicles and reducing vehicle miles traveled (VMT). Consequently, the Project's impacts are anticipated to be less than significant.

Response to Comment No. AG 3-5

This comment notes that Caltrans finds the Project would not conflict with programs, plans, ordinances, or policies related to the circulation system, encompassing transit, roadways, bicycle, and pedestrian facilities. The analysis of consistency of the Project with programs, plans, ordinances, or policies is set forth in Pages IV.K-35 through IV.K-38 of the Draft EIR. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. AG 3-6

Transit

The Project Site is located within a Transit Priority Area and is currently served by many local lines and regional/commuter lines via stops located within convenient walking distance along Universal Hollywood Drive and Lankershim Boulevard. The transit lines include: Metro Local Lines 150/240, 155, 224, and 237, Metro Rapid Line 750, the Metro B Line (Red), and the Burbank Bus Pink Route.

Response to Comment No. AG 3-6

This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. AG 3-7

Pedestrian and Bicycle Project Site Access

Pedestrian access to the Project Site will continue to be provided via Universal Hollywood Drive. The north side of the existing driveway is improved with sidewalks, and the outbound driveway approach at Universal Hollywood Drive is improved with a striped crosswalk and American with Disabilities Act (ADA) access ramps with yellow truncated

domes. A pedestrian path along the south side from the Project Site to the sidewalk along the Project Site's Universal Hollywood Drive frontage has been identified as a potential off-site improvement. Bicycle access to the Project Site will continue to be provided via Universal Hollywood Drive. The Project will provide 118 bicycle parking on-site for hotel guests, visitors, and employees of the Project.

Response to Comment No. AG 3-7

The comment describes the Project's pedestrian and bicycle access information contained in Section IV.K, *Transportation*, of the Draft EIR. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. AG 3-8

VMT

The Project would generate 8.8 daily work VMT per employee, which is below the threshold of significance for the South Valley APC of 11.6 daily work VMT per employee. It should be noted that the Project would incorporate Project Design Feature TRAF-PDF-1 (TDM Program), which includes TDM strategies. A TDM Program can be considered as a Project Design Feature if no VMT impact would result without consideration of the associated TDM strategies. Accordingly, without consideration of the TDM strategies, the Project would generate a total of 4,902 daily vehicle trips and generate 10.0 daily work VMT per employee, which would still be below the threshold of significance for the South Valley APC of 11.6 daily work VMT per employee.

The project's quality restaurant, high-turnover restaurant, bar/lounge, and spa components, which total 25,397 square feet of floor area, are considered local serving retail uses. As the Project's local-serving retail uses total less than 50,000 square feet, a no-impact determination can be made as it relates to VMT for these uses.

Response to Comment No. AG 3-8

The comment describes the Project's VMT and TDM strategies information contained in Section IV.K, *Transportation*, of the Draft EIR and notes that TDM strategies would be incorporated as a Project Design Feature. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. AG 3-9

The proposed Project may demonstrate not significantly contribute to visitor/guest trips when located closer to commonly frequented destinations for guests and visitors compared to other existing hotels. This positioning can result in shorter overall visitor trips compared to what would be expected without the Project. Specifically, the Project will

build 395 guestrooms across Universal Hollywood Drive from Universal Studios Hollywood and Universal CityWalk. The Existing Hotel Building stands as the nearest hotel to the main entrance of Universal Studios Hollywood and Universal CityWalk, with the Sheraton Universal being the only other hotel in close proximity to these destinations, adjoining the Project Site to the west.

Given the Project's proximity to Universal Studios Hollywood and Universal CityWalk, it is plausible that many hotel visitors/guests would opt for walking between these destinations and the Project Site. These walking trips could potentially replace existing vehicle trips to these destinations by visitors staying at off-site hotels. Furthermore, the Existing Hotel Building already offers a shuttle service for transporting visitors and guests to and from Universal Studios Hollywood and Universal CityWalk, a service that would be extended to future visitors and guests of the Project, thereby further reducing vehicle trips. Moreover, the Project is designed to provide 118 bicycle parking facilities for visitors and guests, in accordance with the requirements of the Los Angeles Municipal Code (LAMC).

Considering the Project's provision of 395 additional guestrooms in close proximity to Universal Studios Hollywood and Universal CityWalk, its shuttle service, and the inclusion of bicycle parking amenities, it can be concluded that the Project would not contribute to significant visitor/guest trips. Therefore, the associated Vehicle Miles Traveled (VMT) impacts are anticipated to be less than significant.

Response to Comment No. AG 3-9

This comment reiterates Project circulation information contained in Section IV.K, *Transportation*, of the Draft EIR on pages IV.K-39 and IV.K-40. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. AG 3-10

TRAF-PDF-1: Transportation Demand Management Program (TDM)

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

- a. Transit Subsidies-Caltrans recommends long-term subsidies.
- b. Promotions and Marketing
- c. Include Bicycle Parking: The Project will provide 54 short-term and 64 long-term bicycle parking spaces.

d. Include Secure Bicycle Parking and Showers

The Project Design Feature TRAF-PDF-1, involving a Transportation Demand Management (TDM) Program, leads to a noteworthy 19.5 percent reduction in both overall Vehicle Miles Traveled (VMT) and associated pollutant emissions. We concur that the applicant is adding electric vehicle charging stations to promote energy-efficient transportation.

In addition to the proposed TDM, we encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8). This reference is available online at:

<http://ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

TRAF-PDF-2: Construction Management Plan.

Prior to the issuance of a demolition permit or building permit for the Project, a detailed Construction Management Plan (CMP), including street closure information, traffic management strategies, detour plans, haul routes and a staging plan, will be prepared and submitted to the City for review and approval. The CMP will ensure access will remain unobstructed for land uses in proximity to the Project Site during Project construction and will require coordination with the City and emergency service providers to ensure adequate access, including emergency access, is maintained to the Project Site and neighboring businesses and residences.

Response to Comment No. AG 3-10

This comment reiterates the Project's Project Design Features related to Transportation and recommends reviewing the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8) for applicability of additional TDM and ITS strategies. During preparation of the Draft EIR, the City considered a range of TDM and ITS measures and only included those which the City determined as the most feasible and applicable to the Project, as reflected in TRAF-PDF-1 and as discussed in Section IV.K, *Transportation*, of the Draft EIR. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. AG 3-11

Freeway Safety Analysis

The Project would add 29 trips to the US-101 Southbound Off-Ramp at Lankershim Boulevard during the weekday PM peak hour. The Project would not add 25 trips during the weekday AM and PM peak hours at other freeway off-ramps in the immediate vicinity of the Project Site.

The change in queue length associated with the Project at the US-101 Freeway Southbound Off-Ramp right-turn approach under Future Cumulative with Project conditions increases by approximately 27 feet (i.e., just over one vehicle length) during the weekday PM peak hour. This extension in queue length can be accommodated by the existing off-ramp and the vehicle queue would not extend onto the mainline. The change in queue length at the US-101 Freeway Southbound Off Ramp right-turn approach would be less than the City's threshold of two vehicles, the Project would cause a less than significant freeway safety impact. There is no change in queue length associated with the Project's PM peak hour trips at the US-101 Freeway Southbound Off-Ramp's left-turn and through approaches. Therefore, the Project would cause a less-than-significant freeway safety impact.

On Table 4-2 Freeway Off-Ramp Queue Evaluation US-101 Freeway Southbound Off-Ramp at Lankershim Boulevard Weekday PM Peak Hour of the Appendix K Transportation Assessment, this analysis should disclose existing condition queuing length and existing condition plus project condition for the off-ramp from the stop bar to the gore point to demonstrate the project traffic would not exceed the ramp storage to mainline. Additionally, a footnote should be incorporated into the table to specify that the existing condition data utilizes actual signal timing, which is obtained from either Caltrans or LADOT traffic data. This footnote is essential to provide clarity and transparency regarding the source of information used for the existing condition analysis.

Response to Comment No. AG 3-11

This comment reiterates information contained in Section IV.K, *Transportation*, of the Draft EIR on page IV.K-41 with regard to Freeway Safety Analysis and recommends amending Table 4-2 Freeway Off-Ramp Queue Evaluation US-101 Freeway Southbound Off-Ramp at Lankershim Boulevard Weekday PM Peak Hour of the Appendix K Transportation Assessment (Appendix K-1 of the Draft EIR).

The summary provided in the Draft EIR pertains to Future Cumulative with Project conditions, and states that the Project would not result in a significant freeway safety impact. However, the summary does not specifically address Existing and Existing with Project conditions, which is requested in the comment. With regard to the comment referring to Table 4-2 of the 2020 Transportation Assessment, the analysis provided in the Draft EIR is based on the 2023 Updated Transportation Analysis Addendum (Appendix K-4 of the Draft EIR).

Table 4 of the 2023 Updated Transportation Analysis Addendum (see Table below) provides the existing vehicle storage capacity of the left-turn lane, shared left-turn/through lane, and right-turn lane provided of the US-101 Southbound Off-Ramp at Lankershim Boulevard. As shown on Table 4, each lane provides approximately 300 feet of storage from the stop bar to the gore point, and an additional 564 feet is provided from the gore point to the mainline.

Table 4 also provides the queue lengths for each off-ramp approach. As shown in Table 4, the existing left-turn queue is 258.3 feet, the existing shared left-turn/through lane queue is 149.9 feet, and the existing right-turn lane queue is 219.7 feet. Under Existing with Project conditions, there is no increase in vehicle queueing on the left-turn and shared left-turn/through lanes, although vehicle queuing would be extended by 26.4 feet (i.e., approximately one vehicle length) on the right-turn approach, for a total queue length of 246.1 feet. The forecast queue on all approaches under Existing with Project conditions can be accommodated by the existing lanes, and vehicle queuing is not anticipated to spill out onto the mainline. As was concluded on page IV. K-41 of the Draft EIR, the addition of Project traffic would not result in vehicle queues spilling out onto the mainline. Accordingly, the Project would not result in a significant freeway safety impact.

Regarding the request to add a footnote, as stated on page 24 of the 2023 Updated Transportation Analysis Addendum that is contained in Appendix K-4 of the Draft EIR, the freeway off-ramp queuing analysis was prepared based on the *Highway Capacity Manual*¹ (“HCM”) operational analysis methodology pursuant to the City’s *Transportation Assessment Guidelines*² (“TAG”). The analysis was prepared utilizing the *HCS 2023* software package, which implements the HCM operational methods. Additionally, as stated on page 24 of the 2023 Updated Transportation Analysis Addendum, specifics such as traffic volume data, lane configurations, available vehicle storage lengths, crosswalk locations, posted speed limits, traffic signal timing and phasing for signalized locations, etc., were coded in the *HCS 2023* software. Accordingly, the traffic signal timing chart for the US-101 Freeway Southbound Ramps – Regal Place / Cahuenga Boulevard intersection was obtained from LADOT and was utilized to prepare the analysis. The *HCS 2023* worksheets used to prepare the analysis, which contain the existing traffic signal timing information, are provided in Appendix E of the 2023 Updated Transportation Analysis Addendum (Appendix K-4 of the DEIR). Therefore, the existing condition data in the Draft EIR uses actual signal timing obtained from LADOT. Accordingly, no additional citation is required. Nonetheless, Table 4 has been revised to include the requested footnote and is included below for reference. The change is also included in the Revisions Clarifications and Corrections Chapter of this Final EIR.

¹ *Highway Capacity Manual 7th Edition*, Transportation Research Board of the National Academies of Sciences-Engineering-Medicine, 2022.

² *Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines*, LADOT, August 2022.

Table 4
FREEWAY OFF-RAMP QUEUE EVALUATION
US-101 FREEWAY SOUTHBOUND OFF-RAMP AT
LANKERSHIM BOULEVARD WEEKDAY PM PEAK HOUR

31-Jan-24

STAFF REPORT															
NO.	INTERSECTION	RAMP AND LANE DESCRIPTION	VEHICLE STORAGE CAPACITY [a]	[1]		[2]				[3]		[4]			
				YEAR 2020 EXISTING		YEAR 2020 EXISTING W/ PROJECT				YEAR 2027 FUTURE W/O PROJECT		YEAR 2027 FUTURE W/ PROJECT			
				VEHICLE QUEUE LENGTH [b]	EXCEEDS CAPACITY?	VEHICLE QUEUE LENGTH [b]	EXCEEDS CAPACITY?	CHANGE QUEUE [(2-1)]	SIGNIF. IMPACT [c]	VEHICLE QUEUE LENGTH [b]	EXCEEDS CAPACITY?	VEHICLE QUEUE LENGTH [b]	EXCEEDS CAPACITY?	CHANGE QUEUE [(2-1)]	SIGNIF. IMPACT [c]
6	Cahuenga Boulevard / US-101 Freeway Southbound Ramps - Regal Place <u>[d]</u>	US-101 Southbound Off-Ramp Left Shared Left/Through Right Ramp <u>[d][e]</u>	300 300 300 564	258.3 149.9 219.7 0.0	No No No No	258.3 149.9 246.1 0.0	No No No No	0.0 0.0 26.4 0.0	No No No No	247.2 146.7 242.5 0	No No No No	247.2 146.7 269.5 0	No No No No	0.0 0.0 27.0 0.0	

[a] Expressed in feet.

[b] Pursuant to *LADOT Transportation Assessment Guidelines, August 2022*, the Highway Capacity Manual (HCM) methodology for signalized intersections was utilized to calculate vehicle queuing. The 95th percentile queue is the maximum back of queue with 95th percentile traffic volumes. The HCM 7th Edition methodology worksheets report queues in number of vehicles, however an average vehicle length of 25 feet was assumed for analysis purposes. The reported queues therefore represent the calculated maximum back of queue in feet.

[c] Pursuant to *LADOT Transportation Assessment Guidelines, August 2022*, a freeway safety impact shall be deemed significant if a Project is expected to cause or add to a queue extending onto the freeway mainline by more than two vehicle lengths.

[d] Analysis prepared based on existing signal timing information obtained from LADOT.

[d][e] The Ramp is the remaining length of the off-ramp, behind any approach lane delineation lines, to the point where the ramp diverges from the freeway mainline.

Comment No. AG 3-12

Potential Corrective Measures on Caltrans' Right-Of-Way

Universal Studios Boulevard functions as a private street at the freeway on-ramp. The southbound Universal Studios Boulevard left-turn approach is expected to experience an increase in queue length, extending to approximately four car lengths during the PM Peak Hour due to the project. To address this, the proposed improvement involves adjusting the traffic signal timing plan to allocate additional green time specifically for the southbound Universal Studios Boulevard left-turn approach. It's important to note that this intersection falls under the jurisdiction of Caltrans, and any modifications or improvements to this intersection are subject to thorough review and approval by Caltrans.

Response to Comment No. AG 3-12

The comment refers to the “non-CEQA” operational analysis provided in the Transportation Assessment contained in Appendix K of the Draft EIR. The non-CEQA analysis is required by LADOT for non-CEQA purposes only but is not used to assess the Project’s relative transportation impacts on the environment as outlined in the TAG. The comment refers to a prior suggested change to traffic signal timing provided in the original 2020 Transportation Assessment included in Appendix K-1 of the Draft EIR. However, as traffic signal timing is discussed as a part of the non-CEQA analysis, it is not evaluated as a part of the Draft EIR, and therefore this comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. AG 3-13

Please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standards and specifications.

Response to Comment No. AG 3-13

This comment notes that any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment No. AG 3-14

Others

Any transportation of heavy construction equipment and/or materials that requires the use of oversized transport vehicles on State highways will need a Caltrans transportation permit. We recommend that large-size truck trips be limited to off-peak commute periods. Any debris on the construction truck must be covered by a tarpaulin cover.

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2020-04377-DEIR.

Response to Comment No. AG 3-14

This comment notes that transportation of heavy construction equipment and/or materials that requires the use of oversized transport vehicles on State highways will need a Caltrans transportation permit. The comment also provides the commenter's details and reference number. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. ORG 1

Los Angeles/Orange Counties Building and Construction Trades Council
Ernesto Medrano, Executive Secretary
1626 Beverly Boulevard Los Angeles, CA 90026-5784
Received November 21, 2023

Comment No. ORG 1-1

The Los Angeles/Orange Counties Building and Construction Trades Council represents 150,000 skilled construction workers in 48 local unions and district councils.

We strongly support the proposed Hilton Universal Expansion Project located at 555 E. Universal Hollywood Drive in the San Fernando Valley.

Creating jobs and new revenue sources has never been more vital for Los Angeles. Our Building Trades unions are in an unprecedented drive to recruit new members from underserved communities, including veterans, women, the formerly incarcerated and those with other barriers to employment. Many of these new members are Los Angeles residents. Our all-union projects such as the Hilton create years of opportunity for these Angelenos. Hiring local residents also cuts down commute times and is environmentally friendly.

We support development that will help facilitate significant and sustainable employment growth. With the creation of over 900 construction jobs, hundreds of permanent jobs, and a projected \$6 million in annual revenue generation to the City, this project will help power the local economy and aid in the region's recovery.

In addition to the tremendous economic benefits, this represents a major opportunity to add desperately needed hotel rooms to the existing Hilton Universal, which is operating at or near capacity year-round. Located directly adjacent to the Universal Studios Hollywood theme park, the addition's 395 rooms and new restaurants and amenities for tourists and local community members alike will be a win-win for our City.

We believe in building for the future. This project will create jobs, provide revenue to the City and provide much-needed hotel rooms to meet future demand. Our Building Trades unions stand strongly, together, to build it.

Response to Comment No. ORG 1-1

This comment relates to a support letter (undated) from Ernesto Medrano, Executive Secretary, Los Angeles/Orange Counties Building and Construction Trades Council. The comment expresses general support for the Project. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. ORG 2

Valley Industry & Commerce Association
Stuart Waldman, VICA President
16600 Sherman Way, Suite 170 Van Nuys, CA 91406
Received December 11, 2023

Comment No. ORG 2-1

The Valley Industry & Commerce Association (VICA) is the San Fernando Valley's most influential business advocacy group devoted to advancing the economic interests and opportunities of its members through effective legislative correspondence, civic leadership representation, and conscious community engagement.

VICA supports the Hilton Universal Expansion Project that would add 395 new rooms, restaurants, and other amenities to the existing property. This proposal reflects Sun Hill Properties' continued investment in the future of Los Angeles and the local economy as the region prepares for the 2028 Summer Olympics and more record-breaking tourism in the future.

The Los Angeles Tourism and Convention Board projects that in 2023, Los Angeles will welcome approximately 50 million visitors, which is 98% of pre-pandemic levels. Additionally, they project 31 million room nights to be sold in 2023, exceeding pre-pandemic levels. The Hilton Universal, which has long been recognized as the largest hotel in the San Fernando Valley, is back to operating at or near capacity year-round, representing a shining example of the remarkable post-covid recovery of our local hospitality industry. While these added accommodations are critical to the region's goals for meeting future demand, it's not the only significant economic benefit that will stem from this vitally impactful project.

During construction, the Hilton Universal Expansion Project is projected to create over 900 jobs in the San Fernando Valley. Once the expansion is operational, the new addition will create hundreds of new permanent jobs and is projected to generate over \$6 million in annual revenue for the City of Los Angeles.

The Hilton Universal is a tremendous asset and staple of the San Fernando Valley community. We support their proposed expansion and all the economic benefits that will come with it.

Response to Comment No. ORG 2-1

This comment is a letter dated December 8, 2023, from Stuart Waldman, VICA President, Valley Industry & Commerce Association. The comment expresses general support for the Project. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 1

Brandon Cane
3246 Longridge Terrace
Los Angeles, CA 91423
Received November 20, 2023

Comment No. IND 1-1

To James Harris:

As a Council District 4 homeowner and voter, I would like to go on record in support of the Hilton Universal's plans to add 395 new rooms to the property. Just a few years ago, it felt like the economy was never coming back. Stores were closed, no one was traveling, and the future seemed murky. As a Valley business owner myself, it's been remarkable to see our region recover as quickly as it has. To watch landmark hotels like the Hilton Universal moving forward with plans to expand is a great indicator for not just the hospitality sector, but for all aspects of the economy. More rooms means more jobs, more capacity for tourism, and more local spending. Let's keep up the positive momentum and get this project approved and built.

Best,

Brandon.

Response to Comment No. IND 1-1

The comment expresses general support for the Project. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 2

Corilyn Oliva
10835 Moorpark St.
Los Angeles, CA
Received November 22, 2023

Comment No. IND 2-1

Dear Mr. Harris,

I am writing today in support of the Hilton Universal's proposed expansion project.

As a lifelong San Fernando Valley resident who currently lives about 5 minutes away from the property, I can tell you that this hotel is not just for tourist. It's also heavily patronized by folks in the neighborhood like me, notably for Café Sierra and Five on the Hill. It's also where I recommend friends to stay when they come to town from out-of-state with plans to visit Universal Studios.

I love this place, and seeing it flourishing again post-pandemic is hopefully a sign of full recovery. I am all for their expansion, especially the new restaurants that will be added. The Hilton Universal is a staple of this community, and I look forward to seeing the project approved and built!

Thank you for your consideration.

Response to Comment No. IND 2-1

The comment expresses general support for the Project. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 3

Nicole King, Owner
Cosmo Contour & Spa
3743 Cahuenga Boulevard
Studio City, CA 91604
Received November 29, 2023

Comment No. IND 3-1

Dear Mr. Harris,

I am writing today in support of the Hilton Universal's proposed expansion project.

As the CEO of Cosmo Contour & Spa located at 3743 Cahuenga Boulevard, right across the 101 freeway from the proposed project, I know that this expansion will benefit numerous local businesses like my own. It will bring more visitors to the Valley and strengthen our regional economy for years to come.

Especially after the Covid-19 pandemic, this project is needed more than ever.

I look forward to seeing the project approved and built!

Thank you for your consideration.

Response to Comment No. IND 3-1

The comment expresses general support for the Project. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 4

James Elemendorf
Policy Director, LAANE
Received December 12, 2023

Comment No. ORG IND 4-1

Honorable City Council:

The Hilton Los Angeles/Universal City hotel is working to create more jobs in our community through a proposed expansion that would add 395 new rooms as part of an 18-story hotel addition to the property. Given the recent release of the project's Draft Environmental Impact Report highlighting this plan, I hope you will stand with me in support of their expansion, which will lead to the creation of hundreds of quality, new hospitality jobs.

Thank you.

Response to Comment No. IND 4-1

The comment expresses general support for the Project. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 5

Julio Lopez

Received December 12, 2023

Comment No. ORG IND 5-1

Hello Mr. Harris:

My name is Julio Lopez and I am a member of Unite Here Local 11.

Understanding that the Draft Environmental Impact Report is now circulating, I want to voice my support for the Hilton Universal City expansion project.

I know that Hilton Universal City supports workers like me, and I ask you to support their efforts by approving this project.

Thank you.

Response to Comment No. IND 5-1

The comment expresses general support for the Project. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

Comment Letter No. IND 6

Mark Alcala

Received December 13, 2023

Comment No. ORG IND 6-1

Hello Mr. Harris:

My name is Mark A Alcalaand [sic] I am a member of Local 11. Understanding that the Draft Environmental Impact Report is now circulating, I [sic] want to voice my support for the Hilton Universal City expansion project.

I know that Hilton Universal City supports workers like me, and [sic] I ask you to support their effort by approving this project.

thank you.

Response to Comment No. IND 6-1

The comment expresses general support for the Project. This comment does not raise any issues with respect to the content or adequacy of the Draft EIR. Therefore, it is noted for the record and will be forwarded to the decision-makers for their review and consideration.

CHAPTER 3 – REVISIONS, CLARIFICATIONS, AND CORRECTIONS TO THE DRAFT EIR

This chapter of the Final EIR provides changes to the Draft EIR that have been made to revise, clarify, or correct the environmental impact analysis for the Hilton Universal City Project (Project) pursuant to CEQA Guidelines Section 15132(a). Such changes are a result of public and agency comments received in response to the Draft EIR and/or additional information that has become available since publication of the Draft EIR. For the reasons set forth in Chapter 3.2, below, the revisions, clarifications, and corrections described in this section do not result in any “new significant information” or any new or increased significant environmental impacts associated with the Project pursuant to CEQA Guidelines Section 15088.5, and merely clarify, amplify, or refine information in the Draft EIR.

This chapter is divided into two parts: Section 3.1, Corrections and Additions to Draft EIR Sections and Appendices, and Section 3.2, Effect of Corrections and Revisions.

3.1 Corrections and Additions to Draft EIR Sections and Appendices

The following changes have been made to the Draft EIR to revise, clarify, or correct the environmental impact analysis for the Project. Deletions are shown in ~~striketrough text~~ and additions are shown with double underline. Such changes are presented by EIR section.

Executive Summary, 9. Project Design Features, b) Noise, Page ES-17

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

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

Executive Summary, 9. Project Design Features, d) Transportation, Page ES-18 to ES-20

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

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

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

- Hotel (395 guestrooms): 1 space per 20 guestrooms (20 spaces);
- Restaurant (11,933 s.f.): 1 space per 2,000 s.f. (6 spaces);
- Bar and Lounge (1,590 s.f.): 1 space per 2,000 s.f. (2 spaces¹);
- Spa (8,630 s.f.): 1 space per 2,000 s.f. (4 spaces); and
- Meeting Rooms (3,400 s.f.): 1 space per 10,000 s.f. (2 spaces²).

¹ While the calculation would yield a requirement of one short-term bicycle parking space, Table 12.21 A.16(a)(2) states that a minimum of two short-term bicycle parking spaces are required for a bar/lounge use.

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

The long-term bicycle parking ratios are as follows:

- Hotel (395 guestrooms): 1 space per 10 guestrooms (40 spaces);
- Restaurant (11,933 s.f.): 1 space per 2,000 s.f. (6 spaces);
- Bar and Lounge (1,590 s.f.): 1 space per 2,000 s.f. (2 spaces³)
- Spa (8,630 s.f.): 1 space per 2,000 s.f. (4 spaces); and
- Meeting Rooms (3,400 s.f.): 1 space per 10,000 s.f. (2 spaces⁴).

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

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

TRAF-PDF-2: Construction Management Plan. Prior to the issuance of a demolition permit ~~or building permit~~ for the Project, a detailed Construction Management Plan (CMP), including street closure information, traffic management strategies, detour plans, haul routes and a staging plan, ~~will~~ shall be prepared and submitted to the City for review and approval. The CMP will formalize how construction traffic will be regulated ~~carried out~~ and identify specific actions that will be required to reduce effects on the surrounding community. The CMP will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site and will include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation;
- Ensure that access will remain unobstructed for land uses in proximity to the Project Site during Project construction.
- Coordinate with the City and emergency service providers to ensure adequate access, including emergency access, is maintained to the Project Site and

³ While the calculation would yield a requirement of one long-term bicycle parking space, Table 12.21 A.16(a)(2) states that a minimum of two long-term bicycle parking spaces are required for a bar/lounge use.

⁴ While the calculation would yield a requirement of one long-term bicycle parking space, Table 12.21 A.16(a)(2) states that a minimum of two long-term bicycle parking spaces are required for all other commercial uses not identified in Table 12.21 A.16(a)(2), including the Project's Meeting Room Addition.

neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with LAFD, as necessary.

- Prohibition of construction worker or equipment parking on adjacent streets;
- Prohibition of haul truck staging on any streets adjacent to the Project, unless specifically approved as a condition of an approved haul route;
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding Arterial Streets;
- Containment of construction activity within the Project Site boundaries;
- Implementation of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;
- Scheduling of construction-related deliveries, haul trips, etc., to occur outside the commuter peak hours;
- Spacing of trucks so as to discourage a convoy effect;
- Sufficient watering of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind;
- Maintenance of a log, available on the job site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day; and

Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities posted at the site readily visible to any interested party during site preparation, grading, and construction.

Executive Summary, 9. Project Design Features, e) Utilities and Service Systems – Water Supply, Page ES-21

WS-PDF-1: Water Conservation Features. Prior to issuance of building permits, tThe Project shall demonstrate that will provide the following specific water efficiency features are provided within the new construction:

- Fixtures for the entire Project
 - High Efficiency Toilets with a flush volume of 1.0 gallons per flush, or less
 - High-efficiency Energy Star-rated commercial dishwashers
 - Showerheads with a flow rate of 1.5 gallons per minute, or less
 - Waterless Urinals
- Landscape and irrigation
 - 80 percent California Friendly® plants
 - Artificial Turf on all turf areas
 - Drip/Subsurface Irrigation (Micro-Irrigation)

- Landscaping contouring to minimize precipitation runoff
- Micro-Spray
- Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together)
- Rotating Sprinkler Nozzles for Landscape Irrigation – 0.5 gallon per minute
- Pool
 - Install a meter on the pool make-up line so water use can be monitored and leaks can be identified and repaired
 - Leak Detection System for swimming pools and Jacuzzi
 - Water-Saving Pool Filter

Executive Summary, 10. Mitigation Measures, a) Air Quality, Page ES-21 to ES-22

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

- The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and United States Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards or equivalent for equipment rated at 50 horsepower (hp) or greater during Project construction ~~where available within the Los Angeles region~~. Such equipment shall be outfitted with Best Available Control Technology (BACT) which means a CARB certified Level 3 Diesel Particulate Filter or equivalent.
- Prior to any demolition or construction activity ~~During plan check~~, the Project's representative shall make available to the lead agency and South Coast Air Quality Management District (SCAQMD) a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that shall be used during any of the construction phases. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each such unit's certified tier specification, best available control technology (BACT) documentation, and CARB or SCAQMD operating permit shall be maintained on-site at the time of mobilization of each applicable unit of equipment.
- Prior to any ~~During demolition or construction activity, site preparation, and grading and excavation activities~~, the Project representative ~~contractor~~ shall provide ~~notification and~~ documentation that haul truck drivers have received training regarding idling limitations specified in Title 13 California Code of Regulations, Section 2485, ~~and that haul trucks limit idling for loading and unloading activities to 5 minutes at a location.~~

- Prior to and during any demolition or construction activity, haul trucks shall be limited to not more than 5 minutes of idling for loading and unloading activities.
- Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications. The contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications. Tampering with construction equipment to increase horsepower or to defeat emission control devices shall be prohibited.
- Construction activities shall be discontinued during second-stage smog alerts. A record of any second-stage smog alerts and of discontinued construction activities as applicable shall be maintained by the Contractor on-site and provided to the City Planning Department annually during construction.

Executive Summary, 10. Mitigation Measures, b) Biological Resources, Page ES-22 to ES-23

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

- ~~Any construction or palm removal activities that occur during~~Disturbance to suitable bat roosting habitat shall be scheduled from September 15 – November 30, outside of the maternity roosting and hibernation seasons, for special-status bat species (March 1 through September 30) shall require If suitable roosting habitat (palm trees) does need to be removed, a qualified biologist ~~to shall~~ conduct a pre-construction ~~or palm removal~~ survey, using ~~sonic-acoustic~~ bat detectors (e.g., Anabat) and night vision goggles for an emergence survey (for at least one-hour after sunset) to determine whether special-status bat species are roosting within the suitable roosting habitat, palms that would be removed. The surveys shall be conducted at dusk and after nightfall by a biologist. A qualified biologist is a biologist with specialized bat experience including the familiarity with bat roost biology (i.e., a professional biologist with a minimum of two years of bat survey experience, inclusive of acoustic survey experience).
- If the qualified biologist determines that no potential suitable roosting habitat is present within the survey area, no further action shall be necessary in regard to roosting bat species (both special-status and non-special status, non-game species).
- If an active roost site is located during the pre-construction survey, the roost shall be avoided and Project construction activities shall be conducted as recommended by the qualified biologist to avoid the area, which may include

temporary postponement of activities or provision of a suitable buffer around the roost until roosting activities cease.

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

- ~~If bats are not detected during the pre-construction survey, but the qualified biologist determines that roosting bats may be present at any time of year and could roost in palms at a given location, removal activities shall be initiated by pushing palms using heavy machinery prior to using a chainsaw to remove the tree. In order to provide the optimum warning to any roosting special-status bats that may be present, palms shall be pushed lightly two or three times, with an approximately 30-second pause between each nudge/push to allow bats to become active. A period of at least 24 hours shall elapse between such operations to allow special-status bats to escape the construction area.~~
- ~~A report shall be submitted to the City Planning Department with the results of the pre-construction or tree removal survey and any avoidance actions prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of bat roosting habitat. Avoidance measures developed by the qualified biologist shall be based on site-specific factors to prevent roost disturbances; proposed construction activities, height and distance of bat roosts from proposed construction activities, the presence of visual and/or acoustic barriers between the roost and proposed activities, and the pre-existing level of human activities (e.g., ambient noise, potential movement, etc.) to which the bats may already tolerate.~~

Executive Summary, 10. Mitigation Measures, c) Geology and Soils, Page ES-24

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

disposition shall be included with the final report, which shall be submitted to the appropriate repository and the City.

Executive Summary, 10. Mitigation Measures, d) Noise, Page ES-24 to ES-25

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

NOI-MM-2: Construction Equipment Noise Shielding and Muffling Devices. Prior to any construction activities, the Applicant shall provide a list of equipment and attachments such that demonstrates that Contractors shall ensure that all construction equipment, fixed or mobile, are equipped with properly operating and maintained noise shielding and muffling devices, consistent with manufacturers' specifications. Prior to any construction activities, the Applicant shall provide documentation prepared by a noise consultant verifying compliance with this measure to the City Planning Department. The construction contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturers' specifications. The contractor equipment shall use be equipped with muffler systems that provide a minimum reduction of 8 dBA compared to the same equipment without an installed muffler system, reducing maximum construction noise levels. The contractor shall also keep documentation on-site prepared by a noise consultant verifying compliance with this measure. The construction contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturers' specifications.

Executive Summary, 9. Project Design Features, e) Tribal Cultural Resources, Page ES-20

e) Tribal Cultural Resources

TCR-PDF-1: Construction Tribal Monitoring

Monitor Retention. Prior to commencing any Ground Disturbance Activities (as defined below) at the Project Site, the Applicant, or its successor, shall retain a qualified tribal monitor from and approved by the *Gabrieleño Band of Mission Indians – Kizh Nation*, as well as a qualified tribal monitor from and approved by the *Fernandeño Tataviam Band of Mission Indians* (Tribes), and a qualified archaeological monitor. Ground Disturbance Activities shall include demolition, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil, potholing, pavement removal, grubbing, tree removals, boring or a similar activity at the Project Site. A qualified archaeological monitor

shall be identified as principal personnel who must meet the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation, have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in Southern California, and shall ensure that all other personnel associated with and hired for the archaeological monitoring are appropriately trained and qualified. The Applicant, or its successor, the archaeological monitor, and the tribal monitor(s) shall execute a monitoring agreement prior to the earlier of the commencement of any Ground Disturbing Activity, or the issuance of any permit necessary to commence a Ground Disturbing Activity.

WEAP. Prior to commencing any Ground Disturbance Activities, the archaeological monitor, in consultation with the tribal monitor(s), shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in Ground Disturbance Activities that includes information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during Ground Disturbance Activities. In addition, workers will be shown examples of the types of resources that would require notification of the archaeological monitor and tribal monitor(s). The Applicant shall maintain on the Project Site, for potential City inspection, documentation establishing the WEAP training was completed for all members of the construction crew involved in Ground Disturbance Activities.

On-Site Monitoring. The archaeological and tribal monitor(s) shall observe all Ground Disturbance Activities on the Project Site at all times any Ground Disturbance Activities are taking place. If Ground Disturbance Activities are simultaneously occurring at multiple locations on the Project Site, an archaeological monitor and a tribal monitor(s) shall be assigned to each location where the Ground Disturbance Activities are occurring. The tribal monitor(s) will complete daily monitoring logs that will provide descriptions and locations of the relevant Ground Disturbing Activities, the type of construction activities performed, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe(s). Monitor logs will identify and describe any discovered "tribal cultural resources" as defined in California Public Resources Code Section 21074, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Project Applicant and/or the City upon request to the Tribe(s). If any Project scheduled activities require the tribal monitor(s) to leave the Project Site for a period of time and return, confirmation shall be submitted to the Tribe(s) by the Applicant, in writing, upon completion of each set of scheduled activities and five (5) days' notice (if possible) shall be submitted to the Tribe(s) by the Applicant, in writing, prior to the start of each set of scheduled activities. The on-site monitoring shall end when either 1) confirmation is received from the Applicant, in writing, that all scheduled activities pertaining to tribal monitoring and all Ground Disturbing Activities are completed; or 2) the Tribe(s) provides a determination, in writing, that no future, planned construction

activity, and/or development/construction phase at the Project Site possesses the potential to impact any tribal cultural resources.

Discovery of Resources. In the event that any objects or artifacts that may be tribal cultural resources are encountered during the course of any Ground Disturbance Activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be 60 feet or otherwise determined by the archaeological monitor in consultation with the tribal monitor(s), until the potential “tribal cultural resources” are properly assessed and addressed by the archaeological monitor and the tribal monitor(s) pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all Ground Disturbance Activities in the immediate vicinity of the find (i.e. 60 feet or otherwise determined by the archaeological monitor) until the find can be assessed by the archaeological monitor and tribal monitor(s).
2. If the archaeological monitor and tribal monitor(s) determine the resources are Native American in origin, the Tribe(s) will recommend steps for treatment of all discovered tribal cultural resources in the form and/or manner the Tribe deems appropriate, in the Tribe’s reasonable discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.
3. The Applicant, or its successor, shall implement the Tribe’s recommendations if the archaeological monitor, in consultation with the tribal monitor(s), conclude that the Tribe’s recommendations are reasonable and feasible.
4. In addition to any recommendations from the Tribe(s), the archaeological monitor shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.
5. The Applicant, or its successor, may recommence Ground Disturbance Activities outside of the specified radius of the discovery site, so long as this radius has been reviewed by both the archaeological monitor and tribal monitor(s) and determined to be reasonable and appropriate, and so long as the Applicant has complied with all of the recommendations developed and approved pursuant to the process set forth in Paragraphs 2 through 4 above.
6. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.
7. Notwithstanding Paragraph 6 above, any information that Los Angeles Department of City Planning, in consultation with the Los Angeles City Attorney’s Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code (PRC), Section 6254(r), and handled in compliance with the City’s AB 52 Confidentiality Protocols.

8. Archaeological and Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken.

Discovery of Human Remains and Funerary Items. Native American human remains are defined in Public Resources Code (PRC) Section 5097.98(d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, also called associated grave goods in PRC Section 5097.98(d)(2), are also to be treated according to this statute. If Native American human remains and/or grave goods are discovered or recognized on the Project Site, then PRC Sections 5097.9 et seq. as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per PRC section 5097.98(d)(1) and (2). Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

II. Project Description, Figure II-24, Meeting Room Addition Elevation, Page II-37.

Figure II-24, Meeting Room Addition Elevation has been updated to reflect minor design enhancements to the Meeting Room Addition and Existing Ancillary Hotel Building façade to better complement the Hotel Expansion Building in response to feedback received by the City Planning Department. Specifically, the façade for the proposed Meeting Room Addition has been updated from a plain paint finish to a light brown stone effect paint finish. The façade for the Existing Ancillary Hotel Building would similarly be painted with a light brown stone effect paint on the 1st floor and a light grey stone effect paint on the upper floor. The revised Figure II-24 is provided below.

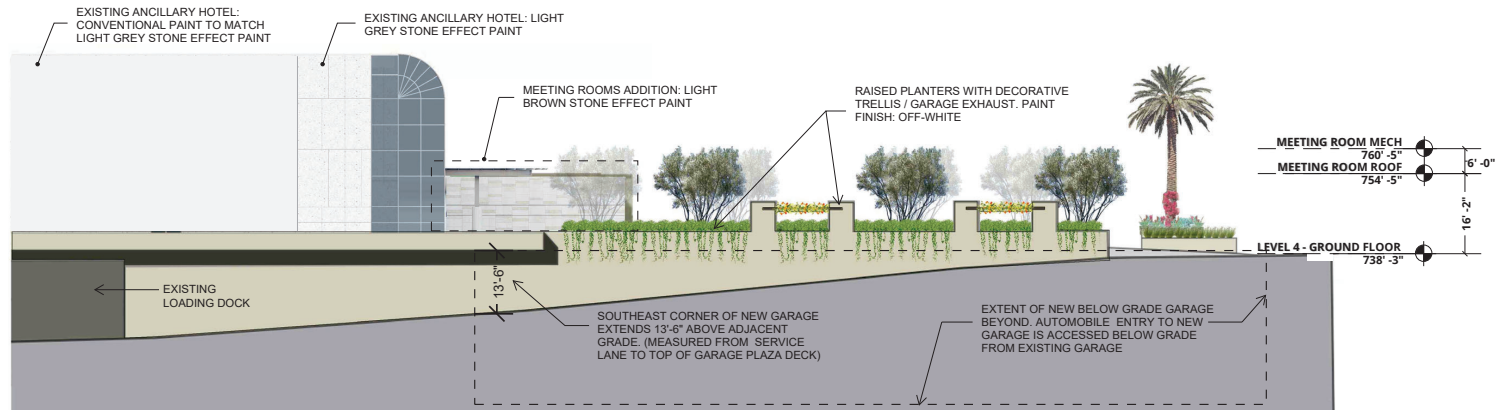
IV. Environmental Impact Analysis, A. Air Quality, (2) Mitigation Measures, Page IV.A-59

- The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and United States Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards or equivalent for equipment rated at 50 horsepower (hp) or greater during Project construction ~~where available within the Los Angeles region~~. Such equipment shall be outfitted with Best Available Control Technology (BACT) which means a CARB certified Level 3 Diesel Particulate Filter or equivalent.

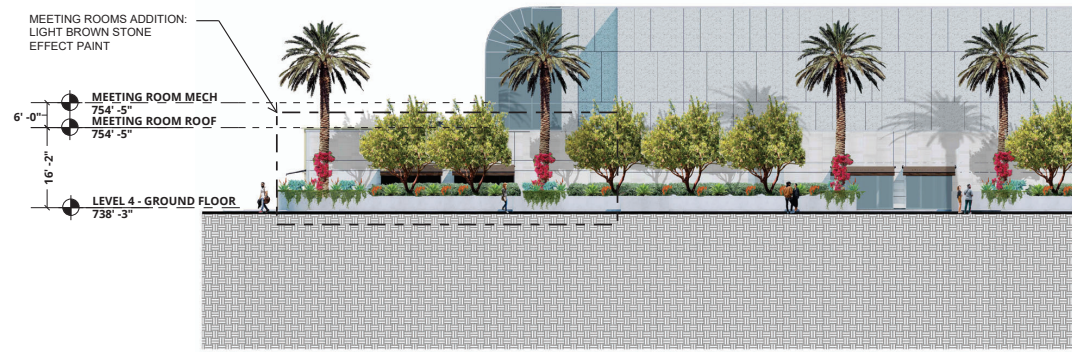
NORTH ELEVATION



EAST ELEVATION



WEST ELEVATION



SOURCE: Ankrom Moisan Architects, Inc., Line+, 2024

Hilton Universal City Project

Figure II-24
Meeting Room Addition Elevation

- ~~Prior to any demolition or construction activity~~During plan check, the Project's representative shall make available to the lead agency and South Coast Air Quality Management District (SCAQMD) a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that shall be used during any of the construction phases. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each such unit's certified tier specification, best available control technology (BACT) documentation, and CARB or SCAQMD operating permit shall be maintained on-site at the time of mobilization of each applicable unit of equipment.
- ~~Prior to any~~ During demolition or construction activity, ~~site preparation, and grading and excavation activities~~, the Project representative ~~contractor~~ shall provide ~~notification and~~ documentation that haul truck drivers have received training regarding idling limitations specified in Title 13 California Code of Regulations, Section 2485, ~~and that haul trucks limit idling for loading and unloading activities to 5 minutes at a location.~~
- Prior to and during any demolition or construction activity, haul trucks shall be limited to not more than 5 minutes of idling for loading and unloading activities.
- Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications. The contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications. Tampering with construction equipment to increase horsepower or to defeat emission control devices shall be prohibited.
- Construction activities shall be discontinued during second-stage smog alerts. A record of any second-stage smog alerts and of discontinued construction activities as applicable shall be maintained by the Contractor on-site and provided to the City Planning Department annually during construction.

IV. Environmental Impact Analysis, B. Biological Resources, (2) Mitigation Measures, Page IV.B-21 to IV.B-22

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

- ~~Any construction or palm removal activities that occur during~~Disturbance to suitable bat roosting habitat shall be scheduled from September 15 – November 30, outside of the maternity roosting and hibernation seasons. for special status bat species (March 1 through September 30) shall require If suitable roosting habitat (palm trees) do need to be removed, a qualified biologist to shall conduct a pre-construction or palm removal survey, using sonic acoustic bat detectors (e.g., Anabat) and night vision goggles for an

- emergence survey (for at least one-hour after sunrise–sunset) to determine whether special-status bat species are roosting within the suitable roosting habitat~~palms that would be removed~~. The surveys shall be conducted at dusk and after nightfall by a biologist. A qualified biologist is a biologist with specialized bat experience including the familiarity with bat roost biology (i.e., a professional biologist with a minimum of two years of bat survey experience, inclusive of acoustic survey experience).
- If the qualified biologist determines that no potential suitable roosting habitat is present within the survey area, no further action shall be necessary in regard to roosting bat species (both special-status and non-special status, non-game species).
 - If an active roost site is located during the pre-construction survey, the roost shall be avoided and Project construction activities shall be conducted as recommended by the qualified biologist to avoid the area, which may include temporary postponement of activities or provision of a suitable buffer around the roost until roosting activities cease.
 - If special-status bats are detected, a qualified bat specialist shall prepare species-specific mitigation measures to reduce or avoid impacts to each special-status species detected. Recommended measures include avoidance by postponing or temporarily halting construction until the special-status bats are no longer detected or implement a 100-foot no-work buffer.
 - If bats are not detected during the pre-construction survey, but the qualified biologist determines that roosting bats may be present at any time of year and could roost in palms at a given location, removal activities shall be initiated by pushing palms using heavy machinery prior to using a chainsaw to remove the tree. In order to provide the optimum warning to any roosting special-status bats that may be present, palms shall be pushed lightly two or three times, with an approximately 30-second pause between each nudge/push to allow bats to become active. A period of at least 24 hours shall elapse between such operations to allow special-status bats to escape the construction area.
 - A report shall be submitted to the City Planning Department with the results of the pre-construction ~~or tree removal~~ survey and any ~~needed maternity-roost~~ avoidance actions prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of bat roosting habitat ~~for bats~~. ~~If special-status bats are detected during the survey, a qualified bat specialist shall prepare species specific mitigation measures to reduce or avoid impacts to each special-status species detected. Mitigation may include avoidance through postponing or temporarily halting construction until maternal roost use is completed, use of construction buffers of no less than 100 feet, or the installation of bat boxes in proximity to detected maternal roosts. Avoidance measures to prevent roost disturbances shall be based on site-specific factors to prevent roost disturbances; including but not limited to numbers and~~

locations of bats, such as proposed construction activities, height and distance of bat roosts from proposed construction activities, the presence of visual and/or acoustic barriers between the roost and proposed activities, and the pre-existing level of human activities (e.g., ambient noise, potential movement, etc.) to which the bats may already tolerate.

- ~~If special-status bats are not detected, but the bat specialist determines that roosting bats may be present at any time of year and could roost in palms at a given location, removal activities will be initiated by pushing palms using heavy machinery prior to using a chainsaw to remove the tree. In order to provide the optimum warning to any roosting special-status bats that may be present, palms shall be pushed lightly two or three times, with an approximately 30-second pause between each nudge/push to allow bats to become active. A period of at least 24 hours shall elapse between such operations to allow special-status bats to escape the construction area.~~
- ~~If bats are not detected during the pre-construction survey, but the qualified biologist determines that roosting bats may be present at any time of year and could roost in palms at a given location, removal activities shall be initiated by pushing palms using heavy machinery prior to using a chainsaw to remove the tree. In order to provide the optimum warning to any roosting special-status bats that may be present, palms shall be pushed lightly two or three times, with an approximately 30-second pause between each nudge/push to allow bats to become active. A period of at least 24 hours shall elapse between such operations to allow special-status bats to escape the construction area.~~
- ~~A report shall be submitted to the City Planning Department with the results of the pre-construction or tree removal survey and any avoidance actions prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of bat roosting habitat. Avoidance measures developed by the qualified biologist shall be based on site-specific factors to prevent roost disturbances; proposed construction activities, height and distance of bat roosts from proposed construction activities, the presence of visual and/or acoustic barriers between the roost and proposed activities, and the pre-existing level of human activities (e.g., ambient noise, potential movement, etc.) to which the bats may already tolerate.~~

IV. Environmental Impact Analysis, E. Geology and Soils, (2) Mitigation Measures, Page IV.E-32

PALEO-MM-3: Paleontological Resources Monitoring: Paleontological resources monitoring shall be conducted for ground disturbing activities in previously undisturbed sediments. Paleontological resources monitoring shall be performed by a qualified paleontological monitor (meeting the standards of the SVP, 2010) under the direction of the Qualified Paleontologist. ~~Paleontological resources monitoring shall be conducted for all ground disturbing activities in previously undisturbed sediments which have high sensitivity for encountering paleontological resources (Upper Topanga Formation, which~~

~~encompasses the entire Project Site). However, d~~Depending on the conditions encountered, full-time monitoring can be reduced to part-time inspections or ceased entirely if determined ~~adequate~~ acceptable by the Qualified Paleontologist; the Qualified Paleontologist shall document any such decision in the Monitors' applicable daily log as well as in their final report. ~~The Qualified Paleontologist shall spot check the excavation on an intermittent basis and recommend whether the depth of required monitoring needs to be revised based on his/her observations.~~ Monitors shall have the authority to temporarily halt or divert work away from exposed fossils or potential fossils. Monitors shall prepare daily logs detailing the types of activities and soils observed and any discoveries. Any significant fossils collected during Project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage. The Qualified Paleontologist shall prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the monitoring effort and any discoveries. If there are significant discoveries, fossil locality information and final disposition shall be included with the final report, which shall be submitted to the appropriate repository and the City.

IV. Environmental Impact Analysis, I. Noise, c) Project Design Features, Page IV.I-34

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

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

IV. Environmental Impact Analysis, I. Noise, (2) Mitigation Measures, Page IV.I-53 to IV.I-54

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

NOI-MM-2: Construction Equipment Noise Shielding and Muffling Devices. Prior to any construction activities, the Applicant shall provide a list of equipment and attachments such that demonstrates that Contractors shall ensure that all construction equipment, fixed or mobile, are equipped with properly operating and maintained noise shielding and

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

IV. Environmental Impact Analysis, I. Noise, (3) Level of Significance After Mitigation (a) Off-Site Receptors, Page IV.I-54

Construction noise levels with implementation of mitigation measures are shown in **Table IV.I-15, *Estimate of Mitigated Construction Noise Levels at Sensitive Receptors***. Mitigation Measure NOI-MM-1 would provide at least a 15-dBA noise reduction at ~~two~~the lower levels (level 5 and below) of the Sheraton Hotel guest rooms (R1), ~~the fourth level that is located at the same elevation as the existing building entrance of the Project Site, as well as the next level above that (fifth level).~~ All levels of the Sheraton Hotel located below the Plaza level of the Project Site (~~fifth level 5 and below~~) would be shielded from construction noise due to the difference in elevation and through implementation of a noise barrier between the Sheraton Hotel and the Project Site blocking the line-of-sight to the construction activities and would be reduced to less than significant levels~~not be impacted by Project construction activities~~. As described above, construction noise impacts would be less than significant for receptor location R2 without implementation of a noise barrier due to the receptor's distance from the Project Site and difference in elevation. Receptor locations R1 (levels 6 through 17) and R3 through R5 would not benefit from implementation of a noise barrier because the receptors are at a higher elevation than the Project Site and would have a direct line-of-sight to the construction area (~~R3 through R5~~). Therefore, noise barrier reductions are not taken for receptor locations R1 (Levels 6 through 17) through R5. Implementation of Mitigation Measure NOI-MM-2 requires that construction equipment be equipped with noise mufflers. Absorptive mufflers are generally considered commercially available, state-of-the-art noise reduction for heavy duty equipment.⁵⁹ Mitigation Measure NOI-MM-2 requires that muffler systems provide a minimum reduction of 8 dBA compared to the same equipment without an installed muffler system.⁶⁰

IV. Environmental Impact Analysis, K. Transportation, c) Project Design Features, Page IV.K-27 to IV.K-30

TRAF-PDF-1: Transportation Demand Management Program. ~~The Applicant will~~shall implement a TDM Program for the ~~Hotel Expansion Building and Meeting Room Addition Project~~ aimed at discouraging single-occupancy vehicle trips and encouraging

alternative modes of transportation, such as carpooling, taking transit, walking, and biking. The Existing Hotel Building currently implements these four strategies and will continue to do so upon completion of the Project. The strategies in the TDM Program will include:

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

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

- Hotel (395 guestrooms): 1 space per 20 guestrooms (20 spaces);
- Restaurant (11,933 s.f.): 1 space per 2,000 s.f. (6 spaces);
- Bar and Lounge (1,590 s.f.): 1 space per 2,000 s.f. (2 spaces⁵);
- Spa (8,630 s.f.): 1 space per 2,000 s.f. (4 spaces); and
- Meeting Rooms (3,400 s.f.): 1 space per 10,000 s.f. (2 spaces⁶).

The long-term bicycle parking ratios are as follows:

- Hotel (395 guestrooms): 1 space per 10 guestrooms (40 spaces);
- Restaurant (11,933 s.f.): 1 space per 2,000 s.f. (6 spaces);

⁵ While the calculation would yield a requirement of one short-term bicycle parking space, Table 12.21 A.16(a)(2) states that a minimum of two short-term bicycle parking spaces are required for a bar/lounge use.

⁶ While the calculation would yield a requirement of one short-term bicycle parking space, Table 12.21 A.16(a)(2) states that a minimum of two short-term bicycle parking spaces are required for all other commercial uses not identified in Table 12.21 A.16(a)(2), including the Project's Meeting Room Addition.

- Bar and Lounge (1,590 s.f.): 1 space per 2,000 s.f. (2 spaces⁷)
- Spa (8,630 s.f.): 1 space per 2,000 s.f. (4 spaces); and
- Meeting Rooms (3,400 s.f.): 1 space per 10,000 s.f. (2 spaces⁸).

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

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

TRAF-PDF-2: Construction Management Plan. Prior to the issuance of a demolition permit ~~or building permit~~ for the Project, a detailed Construction Management Plan (CMP), including street closure information, traffic management strategies, detour plans, haul routes and a staging plan, ~~will~~ shall be prepared and submitted to the City for review and approval. The CMP will formalize how construction traffic will be regulated ~~carried out~~ and identify specific actions that will be required to reduce effects on the surrounding community. The CMP will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site and will include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation;
- Ensure that access will remain unobstructed for land uses in proximity to the Project Site during Project construction.
- Coordinate with the City and emergency service providers to ensure adequate access, including emergency access, is maintained to the Project Site and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with LAFD, as necessary.

⁷ While the calculation would yield a requirement of one long-term bicycle parking space, Table 12.21 A.16(a)(2) states that a minimum of two long-term bicycle parking spaces are required for a bar/lounge use.

⁸ While the calculation would yield a requirement of one long-term bicycle parking space, Table 12.21 A.16(a)(2) states that a minimum of two long-term bicycle parking spaces are required for all other commercial uses not identified in Table 12.21 A.16(a)(2), including the Project's Meeting Room Addition.

- Prohibition of construction worker or equipment parking on adjacent streets;
- Prohibition of haul truck staging on any streets adjacent to the Project, unless specifically approved as a condition of an approved haul route;
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding Arterial Streets;
- Containment of construction activity within the Project Site boundaries;
- Implementation of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers;
- Scheduling of construction-related deliveries, haul trips, etc., to occur outside the commuter peak hours;
- Spacing of trucks so as to discourage a convoy effect;
- Sufficient watering of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind;
- Maintenance of a log, available on the job site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day; and

Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities posted at the site readily visible to any interested party during site preparation, grading, and construction.

IV. Environmental Impact Analysis, L. Tribal Cultural Resources, c) Project Design Features, Page IV.L-10

~~There are no project design features that relate to tribal cultural resources.~~

TCR-PDF-1: Construction Tribal Monitoring

Monitor Retention. Prior to commencing any Ground Disturbance Activities (as defined below) at the Project Site, the Applicant, or its successor, shall retain a qualified tribal monitor from and approved by the *Gabrieleño Band of Mission Indians – Kizh Nation*, as well as a qualified tribal monitor from and approved by the *Fernandeño Tataviam Band of Mission Indians* (Tribes), and a qualified archaeological monitor. Ground Disturbance Activities shall include demolition, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil, potholing, pavement removal, grubbing, tree removals, boring or a similar activity at the Project Site. A qualified archaeological monitor shall be identified as principal personnel who must meet the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation, have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in Southern California, and shall ensure that all other personnel associated with and hired for the archaeological monitoring are appropriately trained and qualified. The Applicant, or its successor, the archaeological monitor, and the tribal

monitor(s) shall execute a monitoring agreement prior to the earlier of the commencement of any Ground Disturbing Activity, or the issuance of any permit necessary to commence a Ground Disturbing Activity.

WEAP. Prior to commencing any Ground Disturbance Activities, the archaeological monitor, in consultation with the tribal monitor(s), shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in Ground Disturbance Activities that includes information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during Ground Disturbance Activities. In addition, workers will be shown examples of the types of resources that would require notification of the archaeological monitor and tribal monitor(s). The Applicant shall maintain on the Project Site, for potential City inspection, documentation establishing the WEAP training was completed for all members of the construction crew involved in Ground Disturbance Activities.

On-Site Monitoring. The archaeological and tribal monitor(s) shall observe all Ground Disturbance Activities on the Project Site at all times any Ground Disturbance Activities are taking place. If Ground Disturbance Activities are simultaneously occurring at multiple locations on the Project Site, an archaeological monitor and a tribal monitor(s) shall be assigned to each location where the Ground Disturbance Activities are occurring. The tribal monitor(s) will complete daily monitoring logs that will provide descriptions and locations of the relevant Ground Disturbing Activities, the type of construction activities performed, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe(s). Monitor logs will identify and describe any discovered "tribal cultural resources" as defined in California Public Resources Code Section 21074, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Project Applicant and/or the City upon request to the Tribe(s). If any Project scheduled activities require the tribal monitor(s) to leave the Project Site for a period of time and return, confirmation shall be submitted to the Tribe(s) by the Applicant, in writing, upon completion of each set of scheduled activities and five (5) days' notice (if possible) shall be submitted to the Tribe(s) by the Applicant, in writing, prior to the start of each set of scheduled activities. The on-site monitoring shall end when either 1) confirmation is received from the Applicant, in writing, that all scheduled activities pertaining to tribal monitoring and all Ground Disturbing Activities are completed; or 2) the Tribe(s) provides a determination, in writing, that no future, planned construction activity, and/or development/construction phase at the Project Site possesses the potential to impact any tribal cultural resources.

Discovery of Resources. In the event that any objects or artifacts that may be tribal cultural resources are encountered during the course of any Ground Disturbance Activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be 60 feet or otherwise determined by the archaeological monitor in

consultation with the tribal monitor(s), until the potential “tribal cultural resources” are properly assessed and addressed by the archaeological monitor and the tribal monitor(s) pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all Ground Disturbance Activities in the immediate vicinity of the find (i.e. 60 feet or otherwise determined by the archaeological monitor) until the find can be assessed by the archaeological monitor and tribal monitor(s).
2. If the archaeological monitor and tribal monitor(s) determine the resources are Native American in origin, the Tribe(s) will recommend steps for treatment of all discovered tribal cultural resources in the form and/or manner the Tribe deems appropriate, in the Tribe’s reasonable discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.
3. The Applicant, or its successor, shall implement the Tribe’s recommendations if the archaeological monitor, in consultation with the tribal monitor(s), conclude that the Tribe’s recommendations are reasonable and feasible.
4. In addition to any recommendations from the Tribe(s), the archaeological monitor shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.
5. The Applicant, or its successor, may recommence Ground Disturbance Activities outside of the specified radius of the discovery site, so long as this radius has been reviewed by both the archaeological monitor and tribal monitor(s) and determined to be reasonable and appropriate, and so long as the Applicant has complied with all of the recommendations developed and approved pursuant to the process set forth in Paragraphs 2 through 4 above.
6. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.
7. Notwithstanding Paragraph 6 above, any information that Los Angeles Department of City Planning, in consultation with the Los Angeles City Attorney’s Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code (PRC), Section 6254(r), and handled in compliance with the City’s AB 52 Confidentiality Protocols.
8. Archaeological and Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken.

Discovery of Human Remains and Funerary Items. Native American human remains are defined in Public Resources Code (PRC) Section 5097.98(d)(1) as an inhumation or

cremation, and in any state of decomposition or skeletal completeness. Funerary objects, also called associated grave goods in PRC Section 5097.98(d)(2), are also to be treated according to this statute. If Native American human remains and/or grave goods are discovered or recognized on the Project Site, then PRC Sections 5097.9 et seq. as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per PRC section 5097.98(d)(1) and (2). Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

IV. Environmental Impact Analysis, L. Tribal Cultural Resources, d) Project Impacts, Page IV.L-11 and IV.L-12

(1) Impact Analysis

As a result of the City's AB 52 consultation efforts and the records searches conducted through SCCIC and the NAHC, one tribal cultural resource – Campo de Cahuenga Adobe – was identified as being located within 0.25-mile of the Project Site. In addition, based on consultation with the Kizh Nation and FTBML, the Project Site was identified as being located in close proximity to ancestral villages and water bodies, indicative of habitation and potentially the presence of tribal cultural resources. While there are no known resources within the Project Site, construction activities associated with the Project may impact unknown buried tribal cultural resources. In consideration of the previously disturbed on-site soil with the Project Site, the distance from the Project Site to historic and prehistoric villages and water bodies, as well as a review of the additional maps and documentation provided by the Kizh Nation and FTBML, exercising its discretion, the City has concluded that there is not substantial evidence of the presence of a specific tribal cultural resource within the Project Site or in its immediate vicinity. As such, based upon the record, the City has determined that no substantial evidence exists to support a conclusion that the Project may cause a significant impact on tribal cultural resources. Therefore, the City has no basis under CEQA to impose any related mitigation measures. However, as discussed further below, as an additional protection, the City-Project Applicant will implement Project Design Feature TCR-PDF-1 to require tribal monitoring of Project grading activities and ~~conditions of approval under its police powers to protect the inadvertent discovery of tribal cultural resources. The conditions of approval~~ TCR-PDF-1 incorporates elements of the requested measures proposed by the Kizh Nation and FTBML, including specific notification requirements in the event of inadvertent discovery. In addition, ~~the conditions of approval~~ TCR-PDF-1 would not provide less protection of any finds in the event of inadvertent discovery of a prospective resource.

In the event that buried tribal cultural resources are encountered during construction, the Project Applicant will be required to comply with TCR-PDF-1, which is consistent with the City's standard conditions of approval for the treatment of inadvertent tribal cultural resource discoveries. These City conditions require the immediate halt of construction activities in the vicinity of the discovery, the coordination with appropriate Native American

tribes and the City, and the development and implementation of appropriate measures for treating the discovery. The Project Applicant would also follow the tribe's recommendations if a qualified archaeologist reasonably concludes that the tribe's recommendations are reasonable and feasible. The recommendations would then be incorporated into a tribal cultural resources monitoring plan and once the plan is approved by the City, ground disturbance activities can resume. In accordance with TCR-PDF-1, which is consistent with the City's standard this condition of approval, all activities would be conducted in accordance with regulatory requirements. ***As a result, with adherence to the City's conditions of approval for the inadvertent discovery of tribal cultural resources, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource, as defined by PRC Section 21074, and impacts to tribal cultural resources would be less than significant.***

(2) Mitigation Measures

Project-level impacts related to tribal cultural resources would be less than significant with adherence to the City's conditions of approval for the treatment of inadvertent tribal cultural resource discoveries. Therefore, no mitigation measures are required.

IV. Environmental Impact Analysis, L. Tribal Cultural Resources, e) Cumulative Impacts, Page IV.L-12

As stated above, while no known tribal cultural resources have been identified within the Project Site, there is one tribal cultural resource within 0.25-mile of the Project Site. However, ~~with adherence to the City's conditions of approval for the inadvertent discovery of tribal cultural resources,~~ the City has determined that the Project would result in less than significant impacts to tribal cultural resources. In addition, similar to the Project, which would implement TCR-PDF-1, which is consistent with the City's standard conditions of approval for the inadvertent discovery of tribal cultural resources and requires tribal monitoring of construction activities, construction worker training, and protocols for resource discovery, ~~as with the Project,~~ each related project within the City would also be required to adhere to the City's standard conditions of approval for the inadvertent discovery of tribal cultural resources. Furthermore, as with the Project, in association with CEQA review, each related project would be required to engage in AB 52 consultation with Native American tribes in order to identify tribal cultural resources that could potentially be impacted by the related project, and to mitigate any identified potential impact. Because the City has determined that the Project would result in less than significant impacts to tribal cultural resources since no known tribal cultural resources are located within the Project Site and adherence to TCR-PDF-1, which is consistent with the City's standard conditions of approval, would further ensure potential impacts to unknown resources would be less than significant, ***the Project's contribution to cumulative impacts would not be cumulatively considerable, and therefore, cumulative impacts would be less than significant.***

IV. Environmental Impact Analysis, M.1 Utilities and Service Systems – Water Supply, c)
Project Design Features, Page IV.M.1-25

WS-PDF-1: Water Conservation Features. Prior to issuance of building permits, the Project shall demonstrate that will provide the following specific water efficiency features are provided within the new construction:

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

V. Alternatives, (i) Noise and Vibration, (i) Noise, (a) Construction, Page V-42 to V-44

(a) On-Site 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.

(b) Off-Site Construction

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). As a result, the off-site construction noise analysis assumes that trucks would travel on all segments that are considered for the operational traffic analysis.

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, a~~ Although Alternative 2 would have less impact as compared to the Project, both Alternative 2 and the Project would have a significant and unavoidable cumulative impact due to the possibility of construction from Alternative 2 overlapping with related projects in the area thereby resulting in a greater number of vehicles traveling along the same roadways (with mitigation). Similar to the Project, there are no feasible mitigation measures to reduce cumulative off-site construction traffic noise levels from Alternative 2 and related projects and cumulative off-site construction traffic noise impacts would be significant and unavoidable.

V. Alternatives, (i) Noise and Vibration, (i) Noise, (a) Construction, Page V-71 to V-72

(c) On-Site 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.

(d) Off-Site Construction

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). As a result, the off-site construction noise analysis assumes that trucks would travel on all segments that are considered for the operational traffic analysis.

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 because of the reduced number of days and truck trips, the duration of impacts would be less under Alternative 3 than under the Project. However, although Alternative 3 would have less impact as compared to the Project, both Alternative 3 and the Project would have a significant and unavoidable cumulative impact due to the possibility of construction from Alternative 3 overlapping with related projects in the area thereby resulting in a greater number of vehicles traveling along the same roadways. 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). Similar to the Project, there are no feasible mitigation measures to reduce cumulative off-site construction traffic noise

levels from Alternative 2 and related projects and cumulative off-site construction traffic noise impacts would be significant and unavoidable.

VI. Other CEQA Considerations, 1. Significant Unavoidable Impacts, On-Site Construction Noise (Project-Level), Page VI-1 and VI-2

Implementation of Mitigation Measures NOI-MM-1 and NOI-MM-2 would reduce the Project's on-site construction noise impacts at certain off-site noise sensitive receptors, to the extent technically feasible. Specifically, the mitigation measures would reduce construction noise levels by a minimum of 15 dBA at ~~two~~ levels 4 and 5 of receptor location R1. Construction noise levels at R2 are less than significant without mitigation, and Receptors R1 (Sheraton Hotel levels 6 through 17) and R3 through R5 would not benefit from noise barriers. However, all sensitive receptors would benefit from implementation of NOI-MM-2. Consequently, with implementation of technically feasible mitigation measures, construction noise impacts at noise-sensitive receptors R1 (Sheraton Hotel levels 6 through 17) ~~and R3 through R5~~ would exceed the significance threshold temporarily during certain months of construction, but construction noise impacts at receptors R3 through R5 would be reduced to less than significant levels when there would be multiple simultaneous construction activities and some equipment used near the periphery of the Project Site. Construction noise impacts would be lower than peak levels when equipment is used in the interior portions of the Project Site, with equipment noise reduced (attenuating) at a rate of at least 6 dBA per doubling of distance between the equipment and the sensitive receptor. The mitigated noise levels conservatively assume that the loudest equipment used during the various construction stages and construction activities would be located on the Project Site in the applicable construction work area for the construction activity at the nearest distance to the sensitive receptor location. There are no other feasible mitigation measures that could be implemented to reduce the temporary noise impacts from on-site construction. Therefore, construction noise impacts associated with on-site noise sources would remain significant and unavoidable.

VI. Other CEQA Considerations, 3. Significant Irreversible Environmental Changes, a) Building Materials and Solid Waste, Page VI-8

Based on the above, the Project's construction and operational waste generation would not exceed the permitted capacity of disposal facilities serving the Project, and would not alter the ability of the County to address landfill needs via existing capacity and other planned strategies and measures for ensuring sufficient landfill capacity exists to meet the needs of the County.

Appendix K-4, 2023 Transportation Analysis Addendum

1. Table 4 of the 2023 Transportation Analysis Addendum (PDF Page 611 of 860 of Appendix K), modify footnotes on Table 4 as follows:

Table 4
FREEWAY OFF-RAMP QUEUE EVALUATION
US-101 FREEWAY SOUTHBOUND OFF-RAMP AT
LANKERSHIM BOULEVARD WEEKDAY PM PEAK HOUR

31-Jan-24

NO.	INTERSECTION	RAMP AND LANE DESCRIPTION	VEHICLE STORAGE CAPACITY [a]	[1] YEAR 2020 EXISTING		[2] YEAR 2020 EXISTING W/ PROJECT				[3] YEAR 2027 FUTURE W/O PROJECT		[4] YEAR 2027 FUTURE W/ PROJECT			
				VEHICLE QUEUE LENGTH [b]	EXCEEDS CAPACITY?	VEHICLE QUEUE LENGTH [b]	EXCEEDS CAPACITY?	CHANGE QUEUE [(2-1)]	SIGNIF. IMPACT [c]	VEHICLE QUEUE LENGTH [b]	EXCEEDS CAPACITY?	VEHICLE QUEUE LENGTH [b]	EXCEEDS CAPACITY?	CHANGE QUEUE [(2-1)]	SIGNIF. IMPACT [c]
6	Cahuenga Boulevard / US-101 Freeway Southbound Ramps - Regal Place [d]	US-101 Southbound Off-Ramp Left	300	258.3	No	258.3	No	0.0	No	247.2	No	247.2	No	0.0	No
		Shared Left/Through	300	149.9	No	149.9	No	0.0	No	146.7	No	146.7	No	0.0	No
		Right	300	219.7	No	246.1	No	26.4	No	242.5	No	269.5	No	27.0	No
		Ramp [d][e]	564	0.0	No	0.0	No	0.0	No	0	No	0	No	0.0	No

[a] Expressed in feet.

[b] Pursuant to *LADOT Transportation Assessment Guidelines*, August 2022, the Highway Capacity Manual (HCM) methodology for signalized intersections was utilized to calculate vehicle queuing. The 95th percentile queue is the maximum back of queue with 95th percentile traffic volumes. The HCM 7th Edition methodology worksheets report queues in number of vehicles, however an average vehicle length of 25 feet was assumed for analysis purposes. The reported queues therefore represent the calculated maximum back of queue in feet.[c] Pursuant to *LADOT Transportation Assessment Guidelines*, August 2022, a freeway safety impact shall be deemed significant if a Project is expected to cause or add to a queue extending onto the freeway mainline by more than two vehicle lengths.

[d] Analysis prepared based on existing signal timing information obtained from LADOT.

[d][e] The Ramp is the remaining length of the off-ramp, behind any approach lane delineation lines, to the point where the ramp diverges from the freeway mainline.

3.2 Effect of Corrections and Revisions

CEQA Guidelines Section 15088.5 requires that an EIR which has been made available for public review, but not yet certified, be recirculated whenever significant new information has been added to the EIR. The entire document need not be circulated if revisions are limited to specific portions of the document.

The relevant portions of CEQA Guidelines Section 15088.5 read as follows:

- (b) *A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not ‘significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. ‘Significant new information’ requiring recirculation includes, for example, a disclosure showing that:*
 - (1) *A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
 - (2) *A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance.*
 - (3) *A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.*
 - (4) *The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.*
- (c) *Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.*

The information contained in this section clarifies, amplifies or refines information in the Draft EIR but does not make any changes that would meet the definition of “significant new information” as defined above. The information added to the Draft EIR does not change the Draft EIR in a way that deprives the public of a meaningful opportunity to comment upon a new or substantially increased significant environmental effect of the Project or disclose a feasible alternative or mitigation measure the Applicant has declined to adopt.

Specifically, the clarifications above include a revision to a table within the Project's Transportation Analysis clarifying that the existing traffic conditions data in the Draft EIR uses actual signal timing data obtained from LADOT, information which was already provided in the Draft EIR (see also Response to Comment No. AG 3-11, in Chapter 2, Responses to Comments, of this Final EIR for additional information) and minor amends to the wording of Project Design Features and Mitigation Measures across a number of sections including Noise, Transportation, Utilities and Service Systems – Water Supply, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, and Transportation to ensure their enforceability. In addition, a Project Design Feature has been included in the Tribal Cultural Resources section of the EIR to clearly formalize the Project Applicant's commitment to facilitate tribal monitoring of grading and construction activities, consistent with the City's standard conditions of approval. Finally, clarification text was included in Alternatives and Other CEQA Considerations, Significant Unavoidable Impacts. Therefore, the additions and corrections contained in this chapter and the information contained in Chapter 2, Responses to Comments, of this Final EIR, clarify, amplify, or make insignificant changes to the Draft EIR. In addition, Chapter 2, Responses to Comments, of this Final EIR, fully considers and responds to comments and as demonstrated in this Final EIR, the changes presented in this chapter do not constitute new significant information warranting recirculation of the Draft EIR as set forth in CEQA Guidelines Section 15088.5. Rather, the Draft EIR is comprehensive and has been prepared in accordance with CEQA. As such, these revisions, clarifications, and corrections do not meet the definition of "significant new information" as defined above, but merely clarify, amplify, and refine information previously presented in the Draft EIR.

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CHAPTER 4 – MITIGATION MONITORING PROGRAM

4.1 Introduction

To ensure that the mitigation measures (MM) identified in an Environmental Impact Report (EIR) are implemented, the California Environmental Quality Act (CEQA) requires the Lead Agency for a project to adopt a program for monitoring or reporting on the revisions it has required for a project and the measures it has imposed to mitigate or avoid significant environmental effects. As specifically set forth in CEQA Guidelines Section 15097(c), the public agency may choose whether its program will monitor mitigation, report on mitigation or both. As provided in CEQA Guidelines Section 15097(c), “monitoring” is generally an ongoing or periodic process of project oversight. “Reporting” generally consists of a written compliance review that is presented to the decision-making body or authorized staff person.

An EIR has been prepared to address the Project’s potential environmental impacts. The evaluation of the Project’s impacts in the EIR takes into consideration the project design features (PDF) and applies MMs needed to avoid or reduce potentially significant environmental impacts. This Mitigation Monitoring Program (MMP) is designed to monitor implementation of the PDFs and MMs identified for the Project.

This MMP has been prepared in compliance with the requirements of Public Resource Code (PRC) Section 21081.6 and CEQA Guidelines Section 15097. The City of Los Angeles (City) is the Lead Agency for the Project and therefore is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation; however, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

4.2 Purpose

It is the intent of this MMP to:

1. Verify compliance with the PDFs and MMs identified in the EIR;
2. Provide a framework to document implementation of the identified PDFs and MMs;
3. Provide a record of mitigation requirements;
4. Identify monitoring and enforcement agencies;

5. Establish and clarify administrative procedures for the clearance of PDFs and MMs;
6. Establish the frequency and duration of monitoring; and
7. Utilize the existing agency review processes wherever feasible.

4.3 Organization

As shown on the following pages, each identified PDF and MM for the Project is listed and categorized by environmental impact area, with accompanying discussion of:

- **Enforcement Agency:** the agency with the power to enforce the PDF or MM.
- **Monitoring Agency:** the agency to which reports involving feasibility, compliance, implementation, and development are made.
- **Monitoring Phase:** the phase of the Project during which the PDF or MM shall be monitored.
- **Monitoring Frequency:** the frequency at which the PDF or MM shall be monitored.
- **Action Indicating Compliance:** the action(s) by which the Enforcement or Monitoring Agency indicates that compliance with the identified PDF or required MM has been implemented.

4.4 Administrative Procedures and Enforcement

This MMP shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each PDF and MM and shall be obligated to provide certification, as identified below, to the appropriate monitoring and enforcement agencies that each PDF and MM has been implemented. The Applicant shall maintain records demonstrating compliance with each PDF and MM. Such records shall be made available to the City upon request. Furthermore, specifically during the construction phase and prior to the issuance of permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of PDFs and MMs during construction activities consistent with the monitoring phase and frequency set forth in this MMP. The Construction Monitor shall also prepare documentation of the Applicant's compliance with the PDFs and MMs during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to report to the Enforcement Agency any non-compliance with the MMs and PDFs within two businesses days if the Applicant does not correct the non-compliance within the specified time following notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

4.5 Program Modification

The Project shall be in substantial conformance with the PDFs and MMs contained in this MMP. The enforcing departments or agencies may determine substantial conformance with PDFs and MMs in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, a PDF or MM may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary Project-related approval, finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to, or deletion of, the PDFs or MMs. Any addendum or subsequent CEQA clearance shall explain why the PDF or MM is no longer needed, not feasible, or other basis for modifying or deleting the PDF or MM, and that the modification will not result in a new significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of a PDF or MM shall not, in and of itself, require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the PDF or MM results in a substantial change to the Project or the non-environmental conditions of approval.

4.6 Mitigation Monitoring Program

Air Quality

Mitigation Measures

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

- The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and United States Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards or equivalent for equipment rated at 50 horsepower (hp) or greater during Project construction. Such equipment shall be outfitted with Best Available Control Technology (BACT) which means a CARB certified Level 3 Diesel Particulate Filter or equivalent.
- Prior to any demolition or construction activity, the Project's representative shall make available to the lead agency and South Coast Air Quality Management District (SCAQMD) a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that shall be used during any of the construction phases. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each such unit's certified tier specification, best available control technology (BACT) documentation, and CARB or SCAQMD operating permit shall be maintained on-site at the time of mobilization of each applicable unit of equipment.

- Prior to any demolition or construction activity, the Project representative shall provide documentation that haul truck drivers have received training regarding idling limitations specified in Title 13 California Code of Regulations, Section 2485.
- Prior to and during any demolition or construction activity haul trucks shall be limited to not more than 5 minutes of idling for loading and unloading activities.
- Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications. The contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications. Tampering with construction equipment to increase horsepower or to defeat emission control devices shall be prohibited.
- Construction activities shall be discontinued during second-stage smog alerts. A record of any second-stage smog alerts and of discontinued construction activities as applicable shall be maintained by the Contractor on-site and provided to the City Planning Department annually during construction.
 - **Enforcement Agency:** City of Los Angeles Department of Building and Safety; South Coast Air Quality Management District
 - **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
 - **Monitoring Phase:** Pre-construction; Construction
 - **Monitoring Frequency:** Once at Project plan check prior to issuance of demolition or grading permit (provide proof of compliance); Periodically during field inspection
 - **Action Indicating Compliance:** Plan check approval and issuance of applicable demolition or grading permit (provide proof of compliance); Field inspection signoff

Biological Resources

Mitigation Measures

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

- Disturbance to suitable bat roosting habitat shall be scheduled from September 15 – November 30, outside of the maternity roosting and hibernation seasons. If suitable roosting habitat (palm trees) does need to be removed, a qualified biologist shall conduct a pre-construction survey using acoustic bat detectors (e.g., Anabat) and night vision goggles for an emergence survey (for at least one-hour after sunset) to

determine whether special-status bat species are roosting within the suitable roosting habitat. A qualified biologist is a biologist with specialized bat experience including the familiarity with bat roost biology (i.e., a professional biologist with a minimum of two years of bat survey experience, inclusive of acoustic survey experience).

- If the qualified biologist determines that no potential suitable roosting habitat is present within the survey area, no further action shall be necessary in regard to roosting bat species (both special-status and non-special status, non-game species).
- If an active roost site is located during the pre-construction survey, the roost shall be avoided and Project construction activities shall be conducted as recommended by the qualified biologist to avoid the area, which may include temporary postponement of activities or provision of a suitable buffer around the roost until roosting activities cease.
- If special-status bats are detected, a qualified bat specialist shall prepare species specific mitigation measures to reduce or avoid impacts to each special-status species detected. Recommended measures include avoidance by postponing or temporarily halting construction until the special-status bats are no longer detected or implement a 100-foot no-work buffer.
- If bats are not detected during the pre-construction survey, but the qualified biologist determines that roosting bats may be present at any time of year and could roost in palms at a given location, removal activities shall be initiated by pushing palms using heavy machinery prior to using a chainsaw to remove the tree. In order to provide the optimum warning to any roosting special-status bats that may be present, palms shall be pushed lightly two or three times, with an approximately 30-second pause between each nudge/push to allow bats to become active. A period of at least 24 hours shall elapse between such operations to allow special-status bats to escape the construction area.
- A report shall be submitted to the City Planning Department with the results of the pre-construction survey and any avoidance actions prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of bat roosting habitat. Avoidance measures developed by the qualified biologist shall be based on site-specific factors to prevent roost disturbances; proposed construction activities, height and distance of bat roosts from proposed construction activities, the presence of visual and/or acoustic barriers between the roost and proposed activities, and the pre-existing level of human activities (e.g., ambient noise, potential movement, etc.) to which the bats may already tolerate.
 - **Enforcement Agency:** City of Los Angeles Department of Building and Safety
 - **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
 - **Monitoring Phase:** Pre-construction; Construction

- **Monitoring Frequency:** Once, prior to issuance of grading permit (provide proof of compliance); Periodically during field inspection
- **Action Indicating Compliance:** Field inspection signoff; compliance report by qualified consultant

Geology and Soils

Mitigation Measures

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

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once, prior to issuance of demolition permit (provide proof of compliance); Ongoing with periodic field inspections during construction if resources are encountered
- **Action Indicating Compliance:** Issuance of demolition permit; compliance report by qualified paleontologist

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

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction

- **Monitoring Frequency:** Once, prior to ground-disturbing activities (provide proof of compliance); Ongoing if construction crews are phased to ensure all new construction personnel have undertaken training
- **Action Indicating Compliance:** Compliance report by qualified paleontologist

PALEO-MM-3: Paleontological Resources Monitoring. Paleontological resources monitoring shall be conducted for ground disturbing activities in previously undisturbed sediments. Paleontological resources monitoring shall be performed by a qualified paleontological monitor (meeting the standards of the SVP, 2010) under the direction of the Qualified Paleontologist. Depending on the conditions encountered, full-time monitoring can be reduced to part-time inspections or ceased entirely if determined acceptable by the Qualified Paleontologist; the Qualified Paleontologist shall document any such decision in the Monitors' applicable daily log as well as in their final report. Monitors shall have the authority to temporarily halt or divert work away from exposed fossils or potential fossils. Monitors shall prepare daily logs detailing the types of activities and soils observed and any discoveries. Any significant fossils collected during Project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage. The Qualified Paleontologist shall prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the monitoring effort and any discoveries, as well as any decisions (and justification) to modify full-time monitoring. If there are significant discoveries, fossil locality information and final disposition shall be included with the final report, which shall be submitted to the appropriate repository and the City.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Ongoing during demolition, excavation and grading activities
- **Action Indicating Compliance:** Compliance report by qualified paleontologist

Greenhouse Gas Emissions

Project Design Features

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

- The Project's buildings will be designed to achieve the United States Green Building Council (USGBC) Leadership in Energy and Environmental Design (LEED) Gold Certification or equivalent and will be designed and operated to meet or exceed the

applicable requirements of the State of California Green Building Standards Code and the City of Los Angeles Green Building Code.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once at Project plan check prior to issuance of building permit; Once after completion of LEED Gold Certification or equivalent operation commissioning activities during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; Field inspection signoff that indicates the Project operates within the expected parameters to achieve the number of points required for LEED Gold Certification or equivalent.

Noise

Project Design Features

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

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Pre-operation
- **Monitoring Frequency:** Once at Project plan check; Once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; Field inspection signoff

NOI-PDF-2: (Mechanical Equipment Noise). Prior to issuance of building permits, the Applicant shall provide documentation to show that all outdoor mounted building mechanical equipment and/or ventilation systems not fully enclosed will be designed to not exceed the noise level limits specified in the LAMC through the use of quiet fans, duct silencers, parapets, enclosures, mufflers, or similar noise attenuation methods.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety

- **Monitoring Phase:** Pre-construction; Pre-operation
- **Monitoring Frequency:** Once at Project plan check; Periodic field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; Field inspection signoff

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

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction; Construction
- **Monitoring Frequency:** Once at Project plan check; Periodic field inspections
- **Action Indicating Compliance:** Issuance of building permit; Field inspection sign-off

Mitigation Measures

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

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once at Project plan check; Once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of any demolition, grading or building permit; Submittal of compliance report from qualified noise consultant

NOI-MM-2: Construction Equipment Noise Shielding and Muffling Devices. Prior to any construction activities, the Applicant shall provide a list of equipment and attachments such that demonstrates that construction equipment, fixed or mobile, are equipped with properly operating and maintained noise shielding and muffling devices, consistent with

manufacturers' specifications. Prior to any construction activities, the Applicant shall provide documentation prepared by a noise consultant verifying compliance with this measure to the City Planning Department. The equipment shall be equipped with muffler systems that provide a minimum reduction of 8 dBA compared to the same equipment without an installed muffler system.. The construction contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturers' specifications.

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-Construction; Construction
- **Monitoring Frequency:** Once at Project plan check; Periodic field inspections
- **Action Indicating Compliance:** Plan check approval and issuance of any demolition, grading or building permit; Field inspection sign-offs

Police Protection

Project Design Features

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

- **Enforcement Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Construction
- **Monitoring Frequency:** Periodic field inspections
- **Action Indicating Compliance:** Field inspection sign-offs

POL-PDF-2: Operational Security Features. During operation, the Hotel would continue to implement its comprehensive 24 hours per day/seven days per week security program, which includes comprehensive coverage and monitoring of key areas through closed circuit television (CCTV), electronically controlled and locking access cards for non-public areas, full time 24-hour, security provided by Hotel staff at the front desk and security personnel. Security personnel duties include, but are not limited to, assisting guests and visitors with Project Site access; monitoring entrances and exits of buildings; managing and monitoring fire/life/safety systems; and patrolling the Project Site. Initial alarms such as intruder alarms or duress alarms will be the responsibility of site security personnel as

first responders. Access to the parking garage will be controlled by an electronic access gate and is monitored by CCTV.

- **Enforcement Agency:** City of Los Angeles Police Department, City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning, City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Post-construction
- **Monitoring Frequency:** Once at Project plan check; Once during field inspection
- **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; Issuance of Certificate of Occupancy

Transportation

Project Design Features

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

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

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

- Hotel (395 guestrooms): 1 space per 20 guestrooms (20 spaces);
- Restaurant (11,933 s.f.): 1 space per 2,000 s.f. (6 spaces);
- Bar and Lounge (1,590 s.f.): 1 space per 2,000 s.f. (2 spaces);
- Spa (8,630 s.f.): 1 space per 2,000 s.f. (4 spaces); and
- Meeting Rooms (3,400 s.f.): 1 space per 10,000 s.f. (2 spaces).

The long-term bicycle parking ratios are as follows:

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

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

- **Include Secure Bicycle Parking and Showers:** This strategy involves implementation of additional end-of-trip bicycle facilities to support safe and comfortable bicycle travel by providing amenities at destinations. This strategy applies to projects that include bicycle parking on-site per the LAMC. As noted above, the long-term bicycle parking would be secured from the general public in accordance with LAMC Section 12.21 A.16(d)(2). In addition, the Project will ensure showers will be provided for employees within the Existing Hotel Building in accordance with LAMC Section 91.6307.
 - **Enforcement Agency:** City of Los Angeles Department of Transportation, City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
 - **Monitoring Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of Building and Safety
 - **Monitoring Phase:** Pre-construction; Construction
 - **Monitoring Frequency:** Once at plan check prior to issuance of applicable demolition or building permit; Periodic field inspections

- **Action Indicating Compliance:** Approval of Traffic Demand Management measures from the Los Angeles Department of Transportation prior to issuance of applicable demolition or building permit; Field inspection sign-offs

TRAF-PDF-2: Construction Management Plan. Prior to the issuance of a demolition permit for the Project, a detailed Construction Management Plan (CMP), including street closure information, traffic management strategies, detour plans, haul routes and a staging plan, shall be prepared and submitted to LADOT for review and approval. The CMP will formalize how construction traffic will be regulated and identify specific actions that will be required to reduce effects on the surrounding community. The CMP will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site and will include, but not be limited to, the following elements, as appropriate:

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

- Maintenance of a log, available on the job site at all times, documenting the dates of hauling and the number of trips (i.e., trucks) per day; and
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities posted at the site readily visible to any interested party during site preparation, grading, and construction.
 - **Enforcement Agency:** City of Los Angeles Department of Transportation, City of Los Angeles Department of Building and Safety; City of Los Angeles Department of City Planning
 - **Monitoring Agency:** City of Los Angeles Department of Transportation; City of Los Angeles Department of Building and Safety
 - **Monitoring Phase:** Pre-construction; Construction
 - **Monitoring Frequency:** Once at plan check prior to issuance of applicable demolition or building permit; Periodic field inspections
 - **Action Indicating Compliance:** Approval of Construction Traffic Management Plan from the Los Angeles Department of Transportation prior to issuance of applicable demolition or building permit; Field inspection sign-offs

Tribal Cultural Resources

Project Design Features

TCR-PDF-1: Construction Tribal Monitoring

Monitor Retention. Prior to commencing any Ground Disturbance Activities (as defined below) at the Project Site, the Applicant, or its successor, shall retain a qualified tribal monitor from and approved by the *Gabrieleño Band of Mission Indians – Kizh Nation*, as well as a qualified tribal monitor from and approved by the *Fernandeño Tataviam Band of Mission Indians* (Tribes), and a qualified archaeological monitor. Ground Disturbance Activities shall include demolition, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil, potholing, pavement removal, grubbing, tree removals, boring or a similar activity at the Project Site. A qualified archaeological monitor shall be identified as principal personnel who must meet the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation, have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in Southern California, and shall ensure that all other personnel associated with and hired for the archaeological monitoring are appropriately trained and qualified. The Applicant, or its successor, the archaeological monitor, and the tribal monitor(s) shall execute a monitoring agreement prior to the earlier of the commencement of any Ground Disturbing Activity, or the issuance of any permit necessary to commence a Ground Disturbing Activity.

WEAP. Prior to commencing any Ground Disturbance Activities, the archaeological monitor, in consultation with the tribal monitor(s), shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in Ground Disturbance Activities that includes information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during Ground Disturbance Activities. In addition, workers will be shown examples of the types of resources that would require notification of the archaeological monitor and tribal monitor(s). The Applicant shall maintain on the Project Site, for potential City inspection, documentation establishing the WEAP training was completed for all members of the construction crew involved in Ground Disturbance Activities.

On-Site Monitoring. The archaeological and tribal monitor(s) shall observe all Ground Disturbance Activities on the Project Site at all times any Ground Disturbance Activities are taking place. If Ground Disturbance Activities are simultaneously occurring at multiple locations on the Project Site, an archaeological monitor and a tribal monitor(s) shall be assigned to each location where the Ground Disturbance Activities are occurring. The tribal monitor(s) will complete daily monitoring logs that will provide descriptions and locations of the relevant Ground Disturbing Activities, the type of construction activities performed, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe(s). Monitor logs will identify and describe any discovered “tribal cultural resources” as defined in California Public Resources Code Section 21074, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Project Applicant and/or the City upon request to the Tribe(s). If any Project scheduled activities require the tribal monitor(s) to leave the Project Site for a period of time and return, confirmation shall be submitted to the Tribe(s) by the Applicant, in writing, upon completion of each set of scheduled activities and five (5) days’ notice (if possible) shall be submitted to the Tribe(s) by the Applicant, in writing, prior to the start of each set of scheduled activities. The on-site monitoring shall end when either 1) confirmation is received from the Applicant, in writing, that all scheduled activities pertaining to tribal monitoring and all Ground Disturbing Activities are completed; or 2) the Tribe(s) provides a determination, in writing, that no future, planned construction activity, and/or development/construction phase at the Project Site possesses the potential to impact any tribal cultural resources.

Discovery of Resources. In the event that any objects or artifacts that may be tribal cultural resources are encountered during the course of any Ground Disturbance Activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be 60 feet or otherwise determined by the archaeological monitor in consultation with the tribal monitor(s), until the potential “tribal cultural resources” are properly assessed and addressed by the archaeological monitor and the tribal monitor(s) pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all Ground Disturbance Activities in the immediate vicinity of the find (i.e. 60 feet or otherwise determined by the archaeological monitor) until the find can be assessed by the archaeological monitor and tribal monitor(s).
2. If the archaeological monitor and tribal monitor(s) determine the resources are Native American in origin, the Tribe(s) will recommend steps for treatment of all discovered tribal cultural resources in the form and/or manner the Tribe deems appropriate, in the Tribe's reasonable discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.
3. The Applicant, or its successor, shall implement the Tribe's recommendations if the archaeological monitor, in consultation with the tribal monitor(s), conclude that the Tribe's recommendations are reasonable and feasible.
4. In addition to any recommendations from the Tribe(s), the archaeological monitor shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.
5. The Applicant, or its successor, may recommence Ground Disturbance Activities outside of the specified radius of the discovery site, so long as this radius has been reviewed by both the archaeological monitor and tribal monitor(s) and determined to be reasonable and appropriate, and so long as the Applicant has complied with all of the recommendations developed and approved pursuant to the process set forth in Paragraphs 2 through 4 above.
6. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.
7. Notwithstanding Paragraph 6 above, any information that Los Angeles Department of City Planning, in consultation with the Los Angeles City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code (PRC), Section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.
8. Archaeological and Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken.

Discovery of Human Remains and Funerary Items. Native American human remains are defined in Public Resources Code (PRC) Section 5097.98(d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, also called associated grave goods in PRC Section 5097.98(d)(2), are also to be treated according to this statute. If Native American human remains and/or grave goods are discovered or recognized on the Project Site, then PRC Sections 5097.9 et seq. as well as Health and Safety Code Section 7050.5 shall be followed. Human remains and grave/burial goods shall be treated alike per PRC section 5097.98(d)(1) and (2). Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

- **Enforcement Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Agency:** City of Los Angeles Department of City Planning; City of Los Angeles Department of Building and Safety
- **Monitoring Phase:** Pre-construction; Construction
- **Monitoring Frequency:** Once, prior to issuance of demolition permit (provide proof of compliance); Ongoing with periodic field inspections during construction if resources are encountered or if construction crews are phased (to ensure all new construction personnel have undertaken training).
- **Action Indicating Compliance:** Issuance of demolition permit; compliance report by qualified archaeologist

Utilities and Services Systems - Water Supply

Project Design Features

WS-PDF-1: Water Conservation Features. Prior to issuance of building permits, the project shall demonstrate that the following specific water efficiency features are provided within the new construction:

- Fixtures for the entire Project
 - High Efficiency Toilets with a flush volume of 1.0 gallons per flush, or less
 - High-efficiency Energy Star-rated commercial dishwashers
 - Showerheads with a flow rate of 1.5 gallons per minute, or less
 - Waterless Urinals

- Landscape and irrigation
 - 80 percent California Friendly® plants
 - Artificial Turf on all turf areas
 - Drip/Subsurface Irrigation (Micro-Irrigation)
 - Landscaping contouring to minimize precipitation runoff
 - Micro-Spray
 - Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together)
 - Rotating Sprinkler Nozzles for Landscape Irrigation – 0.5 gallon per minute
- Pool
 - Install a meter on the pool make-up line so water use can be monitored and leaks can be identified and repaired
 - Leak Detection System for swimming pools and Jacuzzi
 - Water-Saving Pool Filter
 - **Enforcement Agency:** City of Los Angeles Department of Water and Power; City of Los Angeles Department of Building and Safety
 - **Monitoring Agency:** City of Los Angeles Department of Building and Safety
 - **Monitoring Phase:** Pre-construction; Construction
 - **Monitoring Frequency:** Once at Project plan check; Once during field inspection prior to Certificate of Occupancy
 - **Action Indicating Compliance:** Plan check approval and issuance of applicable building permit; Field inspection signoff prior to Certificate of Occupancy

Appendix A
**Original Draft EIR
Comment Letters**

A.1 Agency Letters



AG 1

James Harris <james.harris@lacity.org>

Hilton Universal Expansion Letter of Support

2 messages

Cristine Villorante <cris.villorante@lacity.org>

Mon, Dec 18, 2023 at 1:16 PM

To: James Harris <James.Harris@lacity.org>

Cc: Mashael Majid <mashael.majid@lacity.org>, Karo Torossian <Karo.torossian@lacity.org>, Star Parsamyan <star.parsamyan@lacity.org>, Emma Howard <emma.howard@lacity.org>, Pamela Thornton <Pamela.Thornton@lacity.org>, Doane Liu <doane.liu@lacity.org>

Good afternoon Mr. Harris,
Please find the attached letter of support from the City Tourism Department. Thank you.

I

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Best regards,
Cris Villorante, Exec. Admin. Asst.

City Tourism Department
1201 S. Figueroa Street
Los Angeles, CA 90015
Office: (213) 765-4241
Fax: (213) 765-4441
Email: cris.villorante@lacity.org



Planning_Hilton Universal Expansion _CTD Support Letter (1).pdf
120K

James Harris <james.harris@lacity.org>

Mon, Dec 18, 2023 at 3:25 PM

To: Cristine Villorante <cris.villorante@lacity.org>

Cc: Mashael Majid <mashael.majid@lacity.org>, Karo Torossian <Karo.torossian@lacity.org>, Star Parsamyan <star.parsamyan@lacity.org>, Emma Howard <emma.howard@lacity.org>, Pamela Thornton <Pamela.Thornton@lacity.org>, Doane Liu <doane.liu@lacity.org>

Good afternoon

Thank you for your email and letter regarding the Hilton Universal Project, ENV-2017-5424.

Your email and letter will be added to the case file and will be part of the Project's DEIR administrative record.

Jim



Jim Harris
Major Projects
Los Angeles City Planning
221 N. Figueroa St., Room 1350
Los Angeles, CA 90012
T: (213) 978-1241 | Planning4LA.org



Please note that on **January 22, 2024** the [Processes and Procedures Ordinance](#) will become operative. Applications filed on or after this date are required to use the new forms available on the Department's [Forms page](#).

12/18/23, 3:26 PM

City of Los Angeles Mail - Hilton Universal Expansion Letter of Support

[Quoted text hidden]



AG 1 (cont.)



CITY TOURISM DEPARTMENT

LOS ANGELES CONVENTION CENTER
1201 S. FIGUEROA STREET
LOS ANGELES, CA 90015

(213) 765-4601

December 18, 2023

James Harris, City Planner
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012

Via Email

Dear Mr. Harris:

SUBJECT: Case Number: ENV-2017-5424-EIR

As Executive Director of the Los Angeles City Tourism Department (CTD), I would like to express our support for the Hilton Universal's proposed expansion project at 555 Universal Hollywood Drive. The project would further the City's goals of increasing tourism growth by adding more hotel rooms to meet future demand, which in turn increases economic development of the region and creates long-term benefits for our residents, businesses, and other stakeholders.

The mission of CTD is to enhance and increase Los Angeles' prominence as a world-class tourist and convention destination. CTD promotes policies that drive economic development, create jobs, and improve the experience visitors have when visiting the City's unique cultural, sports, entertainment, and leisure attractions. The Hilton Universal has been a staple of the San Fernando Valley for decades and is one of the largest hotels in the region. Operating at or near capacity year-round, the Hilton Universal's proposed expansion aligns with CTD's goals. By opening in advance of the 2028 Summer Olympics, the Hilton Universal's expansion will add desperately needed hotel rooms to the distinctive culture and character of Universal City.

As you may know, CTD recently completed the City's first Tourism Master Plan, which is



a destination management plan that analyzes Los Angeles' tourism assets and looks at what infrastructure is required in order to handle the large increase in visitation expected in the upcoming years. The Tourism Master Plan contains many important recommendations to develop and position Los Angeles as a leading tourist destination. Understandably, one of the key recommendations is to identify and advocate for new hotel development opportunities.

The Hilton Universal Expansion project would deliver 395 new rooms, which would improve the City's hotel stock and be consistent with the goals of the Tourism Master Plan. Hotels are essential providers of high-quality jobs and account for a substantial part of the workforce in Los Angeles County. These entry-level, well-paying jobs lead to careers and economic stability.

Also, the project has the ability to improve the City's tax base and help Los Angeles recover from the economic effects of the pandemic. CTD welcomes projects willing to invest in the City and facilitate a post-pandemic recovery of the hospitality industry. Accordingly, CTD feels that the Hilton Universal Expansion aligns with its mission, the City's major tourism-related initiatives, and the Tourism Master Plan, and thus encourages the City to approve the project and ensure that the applicant can feasibly develop it.

For the reasons noted above, and generally to advance the San Fernando Valley and the City of Los Angeles as a world-class destination, CTD enthusiastically supports the Hilton Universal Expansion project and looks forward to its approval and eventual opening.

Respectfully submitted,



Doane Liu
Executive Director

DL:DL
Exec. Ref. 23-173

cc: Councilmember Nithya Raman, Council District 4
Council President Paul Krekorian, Council District 2
Councilmember Traci Park, Council District 11
Councilmember Hugo Soto-Martinez, Council District 13
Councilmember Tim McOsker, Council District 15

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

DATE: January 9, 2024

TO: Vincent P.Bertoni, Director of Planning
Department of City Planning

Attn: James Harris, City Planner
Department of City Planning

FROM: Rowena Lau, Division Manager 
Wastewater Engineering Services Division
LA Sanitation and Environment

**SUBJECT: HILTON UNIVERSAL CITY PROJECT - NOTICE OF COMPLETION
AND AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT**

This is in response to your November 16, 2023 Notice of Completion and Availability of Draft Environmental Impact Report for the proposed Hilton Universal City Project located at 555 Universal Hollywood Drive, Universal City, CA 91608. LA Sanitation, Wastewater Engineering Services Division has received and logged the notification. Upon review, there were no changes to the project and the previous response is valid. Please notify our office in the instance that additional environmental review is necessary for this project.

If you have any questions, please call Than Win at (323) 342-6268 or email at than.win@lacity.org.

RL/TW: sa

c: Julie Allen, LASAN
Michael Scaduto, LASAN
Spencer Yu, LASAN
Than Win, LASAN

DEPARTMENT OF TRANSPORTATION

DISTRICT 7

100 S. MAIN STREET, MS 16

LOS ANGELES, CA 90012

PHONE (213) 269-1124

FAX (213) 897-1337

TTY 711

www.dot.ca.gov

*Making Conservation
a California Way of Life***AG 3**

January 10, 2024

James Harris, City Planner
Department of City Planning
City of Los Angeles
221 N. Figueroa St., Room 1350
Los Angeles, CA 90212

RE: Hilton Universal City Project
SCH # 2020100057
Vic. LA-101/PM 9.66 to 10.35
GTS # LA-2020-04377-DEIR

Dear James Harris:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced environmental document. The Hilton Universal City Project (Project) involves the construction of an approximately 300,000 square-foot, 18-story Hotel Expansion Building in addition to the existing 24-story Hilton Universal City Hotel. The Hotel Expansion Building would be comprised of 395 guestrooms, a spa, restaurant, indoor/outdoor bar, two pools, a single-level lobby connecting to the existing hotel building, a meeting room addition to the ancillary building, and a three-level expansion of the existing subterranean parking garage. Upon completion of the Project, the Hilton Universal City Project would provide 890 guestrooms and 697,521 square feet of floor area.

Caltrans is aware of the challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, all future developments should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented

in tandem with routine street resurfacing. Overall, the environmental report should ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

Mobility Plan

Mobility Plan 2035 includes numerous policies and programs that are applicable to development associated with the Project. Overall, the Project design and its features supporting multimodal transportation would not conflict with transportation policies, standards, or programs in Mobility Plan 2035 adopted to protect the environment and reduce VMT.

Sherman Oak-Studio City-Toluca Lake-Cahuenga Pass Community Plan

The evaluation of the Project's consistency with the applicable policies and programs of the Community Plan involves determining whether there is any conflict. The analysis reveals that the Project aligns with all relevant policies and programs outlined in the Community Plan, indicating no conflicts.

Additional Policies and Programs

- a. LADOT Manual of Policies and Procedures
- b. Vision Zero
- c. Plan for a Healthy Los Angeles
- d. Citywide Design Guidelines
- e. Mobility Hubs Reader's Guide
- f. Walkability Checklist

Overall, The Project is in alignment with programs, plans, ordinances, or policies related to the circulation system, encompassing transit, roadways, bicycle, and pedestrian facilities. These have been established to enhance mobility by providing alternatives to single-passenger vehicles and reducing vehicle miles traveled (VMT). Consequently, the Project's impacts are anticipated to be less than significant.

Transit

The Project Site is located within a Transit Priority Area and is currently served by many local lines and regional/commuter lines via stops located within convenient walking distance along Universal Hollywood Drive and Lankershim Boulevard. The transit lines include: Metro Local Lines 150/240, 155, 224, and 237, Metro Rapid Line 750, the Metro B Line (Red), and the Burbank Bus Pink Route.

Pedestrian and Bicycle Project Site Access

Pedestrian access to the Project Site will continue to be provided via Universal Hollywood Drive. The north side of the existing driveway is improved with sidewalks, and the outbound driveway approach at Universal Hollywood Drive is improved with a striped crosswalk and American with Disabilities Act (ADA) access ramps with yellow truncated

domes. A pedestrian path along the south side from the Project Site to the sidewalk along the Project Site's Universal Hollywood Drive frontage has been identified as a potential off-site improvement. Bicycle access to the Project Site will continue to be provided via Universal Hollywood Drive. The Project will provide 118 bicycle parking on-site for hotel guests, visitors, and employees of the Project.

VMT

The Project would generate 8.8 daily work VMT per employee, which is below the threshold of significance for the South Valley APC of 11.6 daily work VMT per employee. It should be noted that the Project would incorporate Project Design Feature TRAF-PDF-1 (TDM Program), which includes TDM strategies. A TDM Program can be considered as a Project Design Feature if no VMT impact would result without consideration of the associated TDM strategies. Accordingly, without consideration of the TDM strategies, the Project would generate a total of 4,902 daily vehicle trips and generate 10.0 daily work VMT per employee, which would still be below the threshold of significance for the South Valley APC of 11.6 daily work VMT per employee.

The project's quality restaurant, high-turnover restaurant, bar/lounge, and spa components, which total 25,397 square feet of floor area, are considered local serving retail uses. As the Project's local-serving retail uses total less than 50,000 square feet, a no-impact determination can be made as it relates to VMT for these uses.

The proposed Project may demonstrate not significantly contribute to visitor/guest trips when located closer to commonly frequented destinations for guests and visitors compared to other existing hotels. This positioning can result in shorter overall visitor trips compared to what would be expected without the Project. Specifically, the Project will build 395 guestrooms across Universal Hollywood Drive from Universal Studios Hollywood and Universal CityWalk. The Existing Hotel Building stands as the nearest hotel to the main entrance of Universal Studios Hollywood and Universal CityWalk, with the Sheraton Universal being the only other hotel in close proximity to these destinations, adjoining the Project Site to the west.

Given the Project's proximity to Universal Studios Hollywood and Universal CityWalk, it is plausible that many hotel visitors/guests would opt for walking between these destinations and the Project Site. These walking trips could potentially replace existing vehicle trips to these destinations by visitors staying at off-site hotels. Furthermore, the Existing Hotel Building already offers a shuttle service for transporting visitors and guests to and from Universal Studios Hollywood and Universal CityWalk, a service that would be extended to future visitors and guests of the Project, thereby further reducing vehicle trips. Moreover, the Project is designed to provide 118 bicycle parking facilities for visitors and guests, in accordance with the requirements of the Los Angeles Municipal Code (LAMC).

Considering the Project's provision of 395 additional guestrooms in close proximity to Universal Studios Hollywood and Universal CityWalk, its shuttle service, and the inclusion

of bicycle parking amenities, it can be concluded that the Project would not contribute to significant visitor/guest trips. Therefore, the associated Vehicle Miles Traveled (VMT) impacts are anticipated to be less than significant.

TRAF-PDF-1: Transportation Demand Management Program (TDM)

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

- a. Transit Subsidies-Caltrans recommends long-term subsidies.
- b. Promotions and Marketing
- c. Include Bicycle Parking: The Project will provide 54 short-term and 64 long-term bicycle parking spaces.
- d. Include Secure Bicycle Parking and Showers

The Project Design Feature TRAF-PDF-1, involving a Transportation Demand Management (TDM) Program, leads to a noteworthy 19.5 percent reduction in both overall Vehicle Miles Traveled (VMT) and associated pollutant emissions. We concur that the applicant is adding electric vehicle charging stations to promote energy-efficient transportation.

In addition to the proposed TDM, we encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

<http://ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

TRAF-PDF-2: Construction Management Plan.

Prior to the issuance of a demolition permit or building permit for the Project, a detailed Construction Management Plan (CMP), including street closure information, traffic management strategies, detour plans, haul routes and a staging plan, will be prepared and submitted to the City for review and approval. The CMP will ensure access will remain unobstructed for land uses in proximity to the Project Site during Project construction and will require coordination with the City and emergency service providers to ensure adequate access, including emergency access, is maintained to the Project Site and neighboring businesses and residences.

Freeway Safety Analysis

The Project would add 29 trips to the US-101 Southbound Off-Ramp at Lankershim Boulevard during the weekday PM peak hour. The Project would not add 25 trips during the weekday AM and PM peak hours at other freeway off-ramps in the immediate vicinity of the Project Site.

The change in queue length associated with the Project at the US-101 Freeway Southbound Off-Ramp right-turn approach under Future Cumulative with Project conditions increases by approximately 27 feet (i.e., just over one vehicle length) during the weekday PM peak hour. This extension in queue length can be accommodated by the existing off-ramp and the vehicle queue would not extend onto the mainline. The change in queue length at the US-101 Freeway Southbound Off Ramp right-turn approach would be less than the City's threshold of two vehicles, the Project would cause a less than significant freeway safety impact. There is no change in queue length associated with the Project's PM peak hour trips at the US-101 Freeway Southbound Off-Ramp's left-turn and through approaches. Therefore, the Project would cause a less-than-significant freeway safety impact.

On Table 4-2 Freeway Off-Ramp Queue Evaluation US-101 Freeway Southbound off-ramp at Lankershim Boulevard Weekday PM Peak Hour of the Appendix K Transportation Assessment, this analysis should disclose existing condition queuing length and existing condition plus project condition for the off-ramp from the stop bar to the gore point to demonstrate the project traffic would not exceed the ramp storage to mainline. Additionally, a footnote should be incorporated into the table to specify that the existing condition data utilizes actual signal timing, which is obtained from either Caltrans or LADOT traffic data. This footnote is essential to provide clarity and transparency regarding the source of information used for the existing condition analysis.

Potential Corrective Measures on Caltrans' Right-Of-Way

Universal Studios Boulevard functions as a private street at the freeway on-ramp. The southbound Universal Studios Boulevard left-turn approach is expected to experience an increase in queue length, extending to approximately four car lengths during the PM Peak Hour due to the project. To address this, the proposed improvement involves adjusting the traffic signal timing plan to allocate additional green time specifically for the southbound Universal Studios Boulevard left-turn approach. It's important to note that this intersection falls under the jurisdiction of Caltrans, and any modifications or improvements to this intersection are subject to thorough review and approval by Caltrans.

Please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standards and specifications.

Others

Any transportation of heavy construction equipment and/or materials that requires the use of oversized transport vehicles on State highways will need a Caltrans transportation permit. We recommend that large-size truck trips be limited to off-peak commute periods. Any debris on the construction truck must be covered by a tarpaulin cover.

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2020-04377-DEIR.

Sincerely,

Frances Duong

FRANCES DUONG

Acting LDR/CEQA Branch Chief

email: State Clearinghouse

A.2 Organization Letters



ORG 1

James Harris <james.harris@lacity.org>

SUPPORT for Universal Hilton DEIR

2 messages

Annette H. Tijerina <atijerina@laocbuildingtrades.org>

Tue, Nov 21, 2023 at 10:23 AM

To: "james.harris@lacity.org" <james.harris@lacity.org>

Cc: "masha.el.majid@lacity.org" <masha.el.majid@lacity.org>, Ernesto Medrano <emedrano@laocbuildingtrades.org>

James –

Please find our support letter to the LA City Planning Department for the Universal Hilton Expansion Project located in the San Fernando Valley.

If you have any questions, please contact me directly.

Respectfully,



Ernesto Medrano, Executive Secretary

LA/OC Building and Construction Trades Council

1626 Beverly Boulevard

Los Angeles, CA 90026

C: 714-651-7273

T: 213-483-4222 F: 213-483-4419

E: emedrano@laocbuildingtrades.org

Sent by:

Annette H

Tijerina

Executive Assistant

**LA/OC Building Trades Council****1626 Beverly Blvd.****Los Angeles, CA 90026**

213-483-4222

atijerina@laocbuildingtrades.org

2 attachments

image004.jpg
5K



Hilton Universal Exp - Support letter.pdf
503K

James Harris <james.harris@lacity.org>

Tue, Nov 21, 2023 at 11:59 AM

To: "Annette H. Tijerina" <atijerina@laocbuildingtrades.org>

Cc: "mashael.majid@lacity.org" <mashael.majid@lacity.org>, Ernesto Medrano <emedrano@laocbuildingtrades.org>

Good afternoon

Thank you for your comment. It will be added to the record for the Project and Draft EIR.

Jim



LOS ANGELES
CITY PLANNING

Jim Harris

Major Projects

Los Angeles City Planning

221 N. Figueroa St., Room 1350

Los Angeles, CA 90012

T: (213) 978-1241 | Planning4LA.org



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Los Angeles / Orange Counties Building and Construction Trades Council

Affiliated with the Building & Construction Trades Dept., AFL-CIO

1626 Beverly Boulevard
Los Angeles, CA 90026-5784
Phone (213) 483-4222
(714) 827-6791
Fax (213) 483-4419



James Harris
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
Email: James.Harris@lacity.org

Re: Case Number: ENV-2017-5424-EIR

Dear Mr. Harris:

The Los Angeles/Orange Counties Building and Construction Trades Council represents 150,000 skilled construction workers in 48 local unions and district councils.

We strongly support the proposed Hilton Universal Expansion Project located at 555 E. Universal Hollywood Drive in the San Fernando Valley.

Creating jobs and new revenue sources has never been more vital for Los Angeles. Our Building Trades unions are in an unprecedented drive to recruit new members from underserved communities, including veterans, women, the formerly incarcerated and those with other barriers to employment. Many of these new members are Los Angeles residents. Our all-union projects such as the Hilton create years of opportunity for these Angelenos. Hiring local residents also cuts down commute times and is environmentally friendly.

We support development that will help facilitate significant and sustainable employment growth. With the creation of over 900 construction jobs, hundreds of permanent jobs, and a projected \$6 million in annual revenue generation to the City, this project will help power the local economy and aid in the region's recovery.

In addition to the tremendous economic benefits, this represents a major opportunity to add desperately needed hotel rooms to the existing Hilton Universal, which is operating at or near capacity year-round. Located directly adjacent to the Universal Studios Hollywood theme park, the addition's 395 rooms and new restaurants and amenities for tourists and local community members alike will be a win-win for our City.

We believe in building for the future. This project will create jobs, provide revenue to the City and provide much-needed hotel rooms to meet future demand. Our Building Trades unions stand strongly, together, to build it.

Thank you,


Ernesto Medrano
Executive Secretary

CC: mashael.majid@lacity.org (CD4 Planning Director)

**ORG 2****James Harris** <james.harris@lacity.org>

VICA Letter of Support - Hilton Universal Expansion DEIR

2 messages

Victor Reyes <Victor@vica.com>

Fri, Dec 8, 2023 at 5:03 PM

To: "James.Harris@lacity.org" <James.Harris@lacity.org>

Cc: "mashael.majid@lacity.org" <mashael.majid@lacity.org>

Good afternoon,

Please see VICA's attached letter of support for the Hilton Universal Expansion Project, Case # ENV-2017-5424-EIR.

Feel free to reach out if you have any questions to this email, or my cell (747)246-1510.

All the best,

**Victor Reyes-Morelos**

Legislative Affairs Manager

Valley Industry & Commerce Association

www.vica.com

Office: 818-817-0545

Cell: 747-246-1510

**Hilton DEIR Letter of Support.pdf**

165K

James Harris <james.harris@lacity.org>

Mon, Dec 11, 2023 at 7:32 AM

To: Victor Reyes <Victor@vica.com>

Cc: "mashael.majid@lacity.org" <mashael.majid@lacity.org>

Good morning

Thank you for your email and letter. They will be added to the case file and will also be part of the administrative record for CEQA.

Jim



Jim Harris

Major Projects

Los Angeles City Planning

221 N. Figueroa St., Room 1350

Los Angeles, CA 90012

T: (213) 978-1241 | Planning4LA.org



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December 8, 2023

James Harris
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012

RE: Case Number: ENV-2017-5424-EIR

Dear Mr. Harris,

The Valley Industry & Commerce Association (VICA) is the San Fernando Valley's most influential business advocacy group devoted to advancing the economic interests and opportunities of its members through effective legislative correspondence, civic leadership representation, and conscious community engagement.

VICA supports the Hilton Universal Expansion Project that would add 395 new rooms, restaurants, and other amenities to the existing property. This proposal reflects Sun Hill Properties' continued investment in the future of Los Angeles and the local economy as the region prepares for the 2028 Summer Olympics and more record-breaking tourism in the future.

The Los Angeles Tourism and Convention Board projects that in 2023, Los Angeles will welcome approximately 50 million visitors, which is 98% of pre-pandemic levels. Additionally, they project 31 million room nights to be sold in 2023, *exceeding* pre-pandemic levels. The Hilton Universal, which has long been recognized as the largest hotel in the San Fernando Valley, is back to operating at or near capacity year-round, representing a shining example of the remarkable post-covid recovery of our local hospitality industry. While these added accommodations are critical to the region's goals for meeting future demand, it's not the only significant economic benefit that will stem from this vitally impactful project.

During construction, the Hilton Universal Expansion Project is projected to create over 900 jobs in the San Fernando Valley. Once the expansion is operational, the new addition will create hundreds of new permanent jobs and is projected to generate over \$6 million in annual revenue for the City of Los Angeles.

The Hilton Universal is a tremendous asset and staple of the San Fernando Valley community. We support their proposed expansion and all the economic benefits that will come with it.

Sincerely,

Stuart Waldman
VICA President

A.3 Individual Letters



IND 1

James Harris <james.harris@lacity.org>

Hilton Universal Expansion

2 messages

Brandon Cane <brandoncane@gmail.com>

Mon, Nov 20, 2023 at 12:32 PM

To: James.Harris@lacity.org

Cc: mashael.majid@lacity.org

To James Harris:

As a Council District 4 homeowner and voter, I would like to go on record in support of the Hilton Universal's plans to add 395 new rooms to the property. Just a few years ago, it felt like the economy was never coming back. Stores were closed, no one was traveling, and the future seemed murky. As a Valley business owner myself, it's been remarkable to see our region recover as quickly as it has. To watch landmark hotels like the Hilton Universal moving forward with plans to expand is a great indicator for not just the hospitality sector, but for all aspects of the economy. More rooms means more jobs, more capacity for tourism, and more local spending. Let's keep up the positive momentum and get this project approved and built.

Best,

Brandon

[3246 Longridge Terrace](#)[Los Angeles, CA 91423](#)**James Harris** <james.harris@lacity.org>

Mon, Nov 20, 2023 at 12:36 PM

To: Brandon Cane <brandoncane@gmail.com>

Cc: mashael.majid@lacity.org

Good afternoon Brandon

Thank you for your comment. It will be added to the record for the Project and Draft EIR.

Jim

**Jim Harris****Major Projects****Los Angeles City Planning**

221 N. Figueroa St., Room 1350

Los Angeles, CA 90012

T: (213) 978-1241 | Planning4LA.org

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IND 2

James Harris <james.harris@lacity.org>

Hilton Universal Project

2 messages

Corilyn Oliva <corilynkoliva@yahoo.com>

Wed, Nov 22, 2023 at 8:25 AM

To: James.Harris@lacity.org

Cc: mashael.majid@lacity.org

Dear Mr. Harris,

I am writing today in support of the Hilton Universal's proposed expansion project.

As a lifelong San Fernando Valley resident who currently lives about 5 minutes away from the property, I can tell you that this hotel is not just for tourist. It's also heavily patronized by folks in the neighborhood like me, notably for Café Sierra and Five on the Hill. It's also where I recommend friends to stay when they come to town from out-of-state with plans to visit Universal Studios.

I love this place, and seeing it flourishing again post-pandemic is hopefully a sign of full recovery. I am all for their expansion, especially the new restaurants that will be added. The Hilton Universal is a staple of this community, and I look forward to seeing the project approved and built!

Thank you for your consideration.

Corilyn Oliva
[10835 Moorpark St.](#)
[Los Angeles, CA](#)

James Harris <james.harris@lacity.org>

Mon, Nov 27, 2023 at 6:58 AM

To: Corilyn Oliva <corilynkoliva@yahoo.com>

Cc: mashael.majid@lacity.org

Good morning

Thank you for your email.

Your comment will be added to the DEIR record and the accompanying case file.

Jim

**Jim Harris****Major Projects****Los Angeles City Planning**

221 N. Figueroa St., Room 1350

Los Angeles, CA 90012

T: (213) 978-1241 | Planning4LA.org



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IND 3

James Harris <james.harris@lacity.org>

Hilton Universal Expansion

2 messages

Cosmo Contour <cosmocontour@yahoo.com>

Wed, Nov 29, 2023 at 12:45 PM

To: James.Harris@lacity.org, mashael.majid@lacity.org, Nathan Shapiro <nshapiro@marathon-com.com>

Dear Mr. Harris,

I am writing today in support of the Hilton Universal's proposed expansion project.

As the CEO of Cosmo Contour & Spa located at [3743 Cahuenga Boulevard](#), right across the 101 freeway from the proposed project, I know that this expansion will benefit numerous local businesses like my own. It will bring more visitors to the Valley and strengthen our regional economy for years to come.

Especially after the Covid-19 pandemic, this project is needed more than ever.

I look forward to seeing the project approved and built!

Thank you for your consideration.

Nicole King, Owner
Cosmo Contour & Spa
[3743 Cahuenga Boulevard](#)
[Studio City, CA 91604](#)

COSMO CONTOUR & SPA

- 📍 Warner Center, Canoga Park
- 📍 Studio City, Los Angeles CA
- 📍 Coconut Grove, Miami FL

LA Spa: 818.330.5220
Cell: 818.835.9077
MIA Spa: 305.528.3231

Website: www.cosmocontourspa.com
Email: info@cosmocontourspa.com
Instagram @cosmocontour

As seen on Selling Sunset

<https://m.youtube.com/watch?v=9sq6o5LrMXc&feature=youtu.be>

As seen on NBC News

<https://www.nbclosangeles.com/california-live/inside-the-first-infrared-cardio-studio/2975779/>

Infrared Equipment

<https://cosmo-contour-sweat.myshopify.com/collections/infrared-exercise>

James Harris <james.harris@lacity.org>

Wed, Nov 29, 2023 at 12:47 PM

To: Cosmo Contour <cosmocontour@yahoo.com>

Cc: mashael.majid@lacity.org, Nathan Shapiro <nshapiro@marathon-com.com>

Good afternoon

Thank you for your comment.

It will be added to the case file and the record for the DEIR.

Jim



Jim Harris

Major Projects

Los Angeles City Planning

221 N. Figueroa St., Room 1350

Los Angeles, CA 90012

T: (213) 978-1241 | Planning4LA.org



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IND 4

James Harris <james.harris@lacity.org>

(no subject)

3 messages

James Elmendorf <jelmendorf@laane.org>

Tue, Dec 12, 2023 at 2:18 PM

To: councilmember.hernandez@lacity.org, councilmember.Krekorian@lacity.org, councilmember.blumenfield@lacity.org, contactCD4@lacity.org, councilmember.yaroslavsky@lacity.org, councilmember.padilla@lacity.org, councilmember.rodriquez@lacity.org, councilmember.harris-dawson@lacity.org, councilmember.price@lacity.org, cd10@lacity.org, councilmember.park@lacity.org, councilmember.Lee@lacity.org, councilmember.soto-martinez@lacity.org, councilmember.kevindeleon@lacity.org, councilmember.mcosker@lacity.org
Cc: James.Harris@lacity.org, mashael.majid@lacity.org

Honorable City Council:

The Hilton Los Angeles/Universal City hotel is working to create more jobs in our community through a proposed expansion that would add 395 new rooms as part of an 18-story hotel addition to the property. Given the recent release of the project's Draft Environmental Impact Report highlighting this plan, **I hope you will stand with me in support of their expansion, which will lead to the creation of hundreds of quality, new hospitality jobs.**

Thank you.

James Elemendorf

Policy Director, LAANE

James Harris <james.harris@lacity.org>

Tue, Dec 12, 2023 at 2:26 PM

To: James Elmendorf <jelmendorf@laane.org>

Cc: councilmember.hernandez@lacity.org, councilmember.Krekorian@lacity.org, councilmember.blumenfield@lacity.org, contactCD4@lacity.org, councilmember.yaroslavsky@lacity.org, councilmember.padilla@lacity.org, councilmember.rodriquez@lacity.org, councilmember.harris-dawson@lacity.org, councilmember.price@lacity.org, cd10@lacity.org, councilmember.park@lacity.org, councilmember.Lee@lacity.org, councilmember.soto-martinez@lacity.org, councilmember.kevindeleon@lacity.org, councilmember.mcosker@lacity.org, mashael.majid@lacity.org

Good afternoon

Thank you for your email and comment on the Hilton Universal Project.
The comment will be added to the administrative record for the CEQA and to the case file.

Jim



Jim Harris
Major Projects
Los Angeles City Planning

221 N. Figueroa St., Room 1350

Los Angeles, CA 90012

T: (213) 978-1241 | Planning4LA.org



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Councilmember Rodriguez <councilmember.rodriguez@lacity.org>
To: james.harris@lacity.org

Tue, Dec 12, 2023 at 2:26 PM

Hello,

Thank you for taking the time to contact my office, and we appreciate your message. Due to the high volume of messages we receive, we will respond to your message in a timely manner.

Please do not hesitate to contact any of the district offices if you have any additional questions.

For media requests, please email: cd7.comms@lacity.org

We look forward to working together to provide the best services for our neighborhoods.

Pacoima District Office
[13520 Van Nuys Blvd. Ste 209](#)
[Pacoima, CA 91331](#)
818-485-0600

Sylmar District Office
[14117 Hubbard St., D#1](#)
[Sylmar, CA 91342](#)
818-756-8409

Sunland-Tujunga District Office
[7747 Foothill Blvd.](#)
[Tujunga, CA 91042](#)
818-352-3287

Los Angeles City Hall- Downtown
[200 N. Spring St. Rm 455](#)
[Los Angeles, CA 90012](#)
213-473-7007

--

Sincerely,

A handwritten signature in black ink that reads 'Monica'.



MONICA RODRIGUEZ
LA CITY COUNCILWOMAN, 7TH DISTRICT

Councilwoman Monica Rodriguez, 7th District

200 N Spring Street, Rm 455, Los Angeles, CA 90012

Phone: 213-473-7007 Fax: 213-847-0707

www.monicarodriguez.org





IND 5

James Harris <james.harris@lacity.org>

(no subject)

2 messages

Julio Lopez <jclopez051568@gmail.com>
To: James.Harris@lacity.org

Wed, Dec 13, 2023 at 2:44 PM

Hello Mr. Harris:

My name is Julio Lopez and I am a member of Unite Here Local 11.

Understanding that the Draft Environmental Impact Report is now circulating, I want to voice my support for the Hilton Universal City expansion project.

I know that Hilton Universal City supports workers like me, and I ask you to support their efforts by approving this project.

Thank you.

Subject: Hilton Universal Expansion

Good afternoon Julio

Thank you for your email. This will be added to both the case file and to the administrative record for the Draft EIR of the Project.

Jim



Jim Harris

Major Projects

Los Angeles City Planning

221 N. Figueroa St., Room 1350

Los Angeles, CA 90012

T: (213) 978-1241 | Planning4LA.org



*Please note that on **January 22, 2024** the [Processes and Procedures Ordinance](#) will become operative. Applications filed on or after this date are required to use the new forms available on the Department's [Forms page](#).*

On Wed, Dec 13, 2023 at 2:45 PM Julio Lopez <jclopez051568@gmail.com> wrote:

Hello Mr. Harris:

My name is Julio Lopez and I am a member of Unite Here Local 11.

Understanding that the Draft Environmental Impact Report is now circulating, I want to voice my support for the Hilton Universal City expansion project.

I know that Hilton Universal City supports workers like me, and I ask you to support their efforts by approving this project.

Thank you.

Subject: Hilton Universal Expansion



IND 6

James Harris <james.harris@lacity.org>

hHilton Universal Expansion

2 messages

Mark Alcalá <somex301@gmail.com>

Wed, Dec 13, 2023 at 1:10 PM

To: "james.harris@lacity.org" <james.harris@lacity.org>, "mashael.majid@lacity.org" <mashael.majid@lacity.org>

Hello Mr. Harris:

My name is Mark A Alcalá and I am a member of Local 11. Understanding that the Draft Environmental Impact Report is now circulating, I want to voice my support for the Hilton Universal City expansion project.

I know that Hilton Universal City supports workers like me, and I ask you to support their effort by approving this project. Thank you.

James Harris <james.harris@lacity.org>

Wed, Dec 13, 2023 at 1:54 PM

To: Mark Alcalá <somex301@gmail.com>

Cc: "mashael.majid@lacity.org" <mashael.majid@lacity.org>

Good afternoon

Thank you for your comment and email. These will be added to the case file as well as to the Draft EIR administrative record.

Jim

**Jim Harris****Major Projects****Los Angeles City Planning**

221 N. Figueroa St., Room 1350

Los Angeles, CA 90012

T: (213) 978-1241 | Planning4LA.org



Please note that on **January 22, 2024** the [Processes and Procedures Ordinance](#) will become operative. Applications filed on or after this date are required to use the new forms available on the Department's [Forms page](#).

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