

**Table 2**  
**Comparison of Environmental Findings between the**  
**Howard Hughes Center EIR (1986), the Howard Hughes Entertainment Center EIR (1998)**  
**and the Addendum for the Second Amendment to the Howard Hughes Center Development Agreement**

Environmental Issue	HHC EIR (1986)	HHC Entertainment Center EIR (1998)	2004 Addendum
Aesthetics (Views)	Significant Impact	Not Analyzed	No Change
Air Quality	Significant Impact	Significant Impact	No Change
Cultural/Archaeological Resources	Less Than Significant Impact	Not Analyzed	No Change
Earth (Grading)	Less Than Significant Impact	Not Analyzed	No Change
Hydrology / Water Quality	Less Than Significant Impact	Not Analyzed	Less Than Significant Impact
Land Use and Planning	Less Than Significant Impact	Not Analyzed	Less Than Significant Impact
Noise	Significant Impact	Less Than Significant Impact	Less Than Significant Impact - No Change
Population and Housing	Less Than Significant Impact	Not Analyzed	Less Than Significant -Beneficial Impact
Public Services- Fire Protection	Less Than Significant Impact	Not Analyzed	Less Than Significant Impact
Public Services - Police Protection	Less Than Significant Impact	Not Analyzed	Less Than Significant Impact
Public Services - Schools	Less Than Significant Impact	Not Analyzed	Less Than Significant Impact
Public Services - Parks and Rec.	Less Than Significant Impact	Not Analyzed	Less Than Significant Impact
Transportation and Traffic	Significant Impact	Less Than Significant Impact	Less Than Significant Impact
Utilities - Energy Conservation	Significant Impact	Not Analyzed	No Change
Utilities -Sewer	Significant Impact	Not Analyzed	Less Than Significant Impact
Utilities - Solid Waste	Significant Impact	Not Analyzed	Less Than Significant Impact
Utilities - Water Availability	Not Analyzed	Not Analyzed	Less Than Significant Impact

present (2004) environmental conditions demonstrates that significant environmental effects previously anticipated to occur with regards to sewers, traffic and circulation, have not been as severe as expected. In the case of sewers and traffic, for example, better-than-expected environmental conditions are, in part a direct result of successful mitigation improvements implemented during the development of the HHC.

The analysis also demonstrates that no new significant environmental effects will be created by the proposed changes to the project. While the project will generate somewhat increased demands for public services and utilities, the analysis presented in Section IV demonstrates that such impacts will be substantially reduced to less than significant levels through the payment of mandatory developer fees and special tax assessments that have specifically been adopted by Ordinance to address the impacts that are typically inherent with residential developments. In summary, since the proposed changes to the Project do not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects which would call, as provided in Section 15162 of the State CEQA Guidelines, for the preparation of a Subsequent EIR, an Addendum serves as the appropriate form of documentation to meet the statutory requirements of CEQA.

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

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The following analysis addresses each of the environmental issues that were previously analyzed within the scope of the Howard Hughes Center EIR (City of Los Angeles EIR No. 282-83-ZC(CUZ)(ZV)(SUB) and State Clearinghouse No. 83090705), where applicable, as modified within the Howard Hughes Entertainment Center EIR (City of Los Angeles EIR No. 97-0182-SUB(CUB) and State Clearinghouse No. 97061068). The conclusions of each EIR are provided as a reference for each environmental issue area for purposes of disclosing how the proposed changes (as defined in Section II, Project Description) affect the conclusion of the prior environmental findings.

### **AESTHETICS (VIEWS)**

#### **Environmental Findings of 1986 Howard Hughes Center EIR**

The HHC EIR concluded that the project's high-rise structures would obstruct the then existing views over the project site from adjoining and nearby properties. The tract approval limited the height of the proposed buildings to allow for viewing channels through the project development.

In the adopted statement of overriding considerations, the City found that the project's view obstruction is not uniquely associated with this project, but is inherently possible under existing zoning and district plan designations. The project's impact is partially mitigated by siting and placement of high-rise structures and by project-imposed height restrictions, which will allow views between some taller buildings and over others. Nevertheless, the environmental findings for the HHC EIR concluded that some existing views would still be obstructed.

A Statement of Overriding Considerations was adopted for this unavoidable significant impact.

#### **Environmental Findings of 1998 Howard Hughes Entertainment Center EIR**

Aesthetics and views were not evaluated within the scope of the Howard Hughes Entertainment Center EIR as the Initial Study concluded that views would not be substantially altered by this project.

#### **Environmental Effects of Proposed Amendment**

Although implementation of the Proposed Project would alter public views of the project site, impacts upon views were already analyzed under previous environmental documents for the HHC. The proposed changes included in the Second Amendment to the HHC Development Agreement involve substituting 600 residential dwelling units for 600 hotel rooms in the HHC project. The proposed changes would not affect the underlying zoning designation, building placement and associated density and height limitations for the site. Accordingly, no revisions to the prior environmental findings with

respect to views and aesthetics are required. Thus, no impacts upon scenic views would occur and no mitigation measures are warranted.

Adequate lighting for the Proposed Project would be required in order to illuminate walkways, building entrances, porches, etc., all of which would be necessary to provide an element of security. Ensuring the security of the project site would also consequently foster security in the surrounding neighborhood. All lighting associated with the Proposed Project would be directed onto the site in order to reduce light "spillage" onto adjacent uses. Any new lighting would be implemented in a manner consistent with the existing lighting design of the HHC development. Existing street lights would serve to illuminate adjacent sidewalks, and no new street lights would be installed. The exchange of residential units in place of hotel rooms would not create any additional sources of light or glare. Overall, the proposed exchange of hotel uses for residential uses would not be expected to emanate any more light than is currently provided for under existing entitlements. As such, light impacts on the surrounding environment would be less than significant and no mitigation is warranted.

With regard to the criteria set forth in CEQA Section 15162 (a), the changes proposed by the Second Amendment would not result in any new significant view obstructions or light and glare effects or result in a substantial increase in the severity of those effects as previously identified. Therefore, the preparation of a subsequent EIR is not warranted.

## **AIR QUALITY**

### **Environmental Findings of 1986 Howard Hughes Center EIR**

According to the air quality analysis from the 1986 CEQA Findings for the Howard Hughes Center, operation of the Proposed Project was estimated would generate an estimated 4.5 tons of mobile source air pollutants. The operational impacts were found not to exceed State or Federal air quality standards. However, the cumulative impact on local and regional air quality would still remain significant.

A Statement of Overriding Considerations was adopted for the project's contribution to cumulative and regional air quality impacts.

### **Environmental Findings of 1998 Howard Hughes Entertainment Center EIR**

The estimated construction-related emissions for the Howard Hughes Entertainment Center were as follows: 3.43 tons/quarter of CO, 1.07 tons/quarter of ROG, 15.76 tons/quarter of NO<sub>x</sub> and 1.12 tons/quarter of PM<sub>10</sub>. The average daily emissions of NO<sub>x</sub> would exceed the SCAQMD daily thresholds during the construction period of the Center. Thus, while emissions of this pollutant would constitute a significant impact; emissions of CO, ROG and PM<sub>10</sub> were not considered significant since their emission levels would be below the significance thresholds. Even with implementation of the recommended mitigation measures, NO<sub>x</sub> would still generate a significant impact to regional air quality.

A Statement of Overriding Considerations was adopted to address the project's significant and unavoidable air quality impacts.

#### **Environmental Effects of Proposed Amendment**

The Proposed Project's construction-related air quality emissions would be the same with or without the Second Amendment to the HHC Development Agreement as the proposed amendment would not change the overall building density of the HHC project. Assuming this proposed amendment is not approved, construction of the current entitled uses could potentially commence immediately with a hotel development. Expanding the terms of the Development Agreement for another 5 years would prolong the buildout date and could potentially involve the construction of residential units as opposed to hotel rooms. The construction activities and duration of the active construction period associated with either hotel or residential units would be substantially equivalent with respect to addressing air quality emissions. Thus, the proposed amendment would not generate any new construction-related air quality impacts.

With respect to operational mobile source emissions associated with traffic, the HHC Development Agreement was conditionally approved on the basis that the HHC developer would be responsible for implementing a Transportation Demand Management (TDM) Program to reduce vehicle trip generation by 17 percent. The TDM Program includes established guidelines with which HHC development must comply to meet this goal. Further, the density and allowable uses are controlled by a vehicle trip cap of no more than 4,785 p.m. peak hour inbound and outbound project-related vehicle trips. The proposed amendment would not alter the trip cap or the TDM requirements for the HHC project. Thus, the traffic related emissions would not be affected by allowing an even exchange of hotel rooms for dwelling units because the associated traffic levels would not exceed 4,785 regardless of the type of land uses developed (see Appendix A). The Proposed Project would not generate additional trips beyond the trip cap as discussed above and would therefore not affect traffic-related emissions. Therefore, the Proposed Project would not generate any new traffic-related air quality impacts and the unavoidable significant impacts on air quality identified in the previous HHC EIRs would not be substantially more severe than previously analyzed. Thus, under the criteria set forth in CEQA Section 15162 (a), the preparation of a subsequent EIR is not warranted.

#### **CULTURAL / ARCHAEOLOGICAL RESOURCES**

##### **Environmental Findings of 1986 Howard Hughes Center EIR**

The HHC EIR disclosed the Project Site is in an area of high archaeological sensitivity. Two recorded archaeological sites (LAN 213, LAN 216) are located on the project site, although extensive test excavation of these two sites revealed no historical or archaeological evidence of any significance. The 1986 Tract Map approval (Map No. 35269) requires the subdivider to retain a qualified archaeologist to monitor subsurface operations and to order reasonable protective measures if any significant

archaeological resources are uncovered. As a result, the project's impact was concluded to be reduced to a less than significant impact.

#### **Environmental Findings of 1998 Howard Hughes Entertainment Center EIR**

The Howard Hughes Entertainment Center EIR did not specifically address the issues of Cultural Resources, as this issue was adequately addressed in the 1986 Howard Hughes Center EIR. As documented in the Initial Study for the Howard Hughes Entertainment Center EIR, further analysis of this issue was not warranted.

#### **Environmental Effects of Proposed Amendment**

As stated above, it has already been determined that the project site is in an area of high archeological sensitivity. Two recorded archeological sites have been identified on the project site, although test excavation of these two sites revealed no historical or archaeological evidence of any significance. The existing Development Agreement was approved under the condition that the Project Applicant retain a qualified archaeologist to monitor subsurface operations and to order reasonable protective measures if resources are recovered. The Proposed Project would continue to be subject to this condition and thus would not result in any impact different than that already assessed and mitigated by the existing Development Agreement.

As the Proposed Project does not increase the development footprint and would involve construction and earthwork activities within the building pad areas previously identified, the proposed Second Amendment would not result in any new significant impacts upon cultural or archaeological resources or result in a substantial increase in the severity of impacts previously identified. Therefore, as the same precautionary mitigation measures would apply, the preparation of a subsequent EIR is not warranted.

#### **EARTH (GRADING)**

##### **Environmental Findings of 1986 Howard Hughes Center EIR**

The HHC EIR estimated a total of approximately 394,000 cubic yards of fill will be required of which approximately 162,000 cubic yards would be excavated at the site and approximately 231,600 cubic yards would be imported. All grading was to be conducted in accordance with the recommendations of the geotechnical reports by the consulting geologist and the City's existing grading ordinance. The Advisory Agency required various grading techniques recommended by the Los Angeles Department of Building and Safety (LADBS) to maximize the safety of all graded areas. Slopes are to be landscaped and maintained by a sprinkling irrigation system to minimize erosion. With implementation of the mitigation measures, grading impacts were concluded to be less than significant.

**Environmental Findings of 1998 Howard Hughes Entertainment Center EIR.**

The Howard Hughes Entertainment Center EIR did not specifically address the issues of soils and grading within the scope of the EIR, as this issue was adequately addressed in the Initial Study, which concluded no further analysis was warranted. Specifically, the Initial Study discussion stated that the proposed entertainment center project had been designed to conform to the current topography of the site. The lowest subterranean level of the proposed parking facilities would sit at the site's then current site grade level. An estimated 22,000 cubic yards of fill would be required surrounding project buildings to raise the project site to the anticipated finished grade of Center Drive. The estimated cut and fill was determined to be substantially within the grading program previously analyzed for the entitled HHC project. Accordingly, the Initial Study concluded that no further analysis was warranted.

**Environmental Effects of Proposed Amendment**

The HHC Development Agreement was approved with grading conditions and mitigation measures, such as slope landscaping and the installation of a sprinkling system to minimize erosion, which would reduce any soil or grading impacts to less than significant levels. The proposed amendment to the Development Agreement would be subject to the same requirements and mitigation measures that were conditioned as part of the 1986 Tract Map approval. In accordance with the LADBS standards, a detailed foundation design will be required to be prepared and submitted for approval to demonstrate the Proposed Project will be able to mitigate the hazards associated with geologic and seismic safety risks to an acceptable level. Therefore, with adherence to these standards, the Proposed Project's impacts would be reduced to less than significant levels. No further mitigation is warranted.

According to the most recent Alquist-Priolo Special Study Zones and Fault Rupture Study Areas, there are no active surface fault traces known to be present on the project site.<sup>1</sup> The site is, however, located in a fault rupture study area. A fault rupture study area is defined by the City of Los Angeles General Plan Seismic Safety Plan Element as any area 1/8 of a mile on either side of a known or assumed trace of the nearest potentially active fault that have been active or potentially active within the past 11,000 years.<sup>2</sup> As with all properties in the seismically active southern California region, the project site and surrounding area is susceptible to severe ground shaking during a seismic event. The site is located south of the Santa Monica Fault Zone.<sup>3</sup> Potential impacts from seismic ground shaking are present throughout southern California and would be of comparable intensity at the project site as it would be

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<sup>1</sup> *Los Angeles Citywide General Plan Framework, Safety Element: Alquist-Priolo Special Study Zones & Fault Rupture Study Areas, Los Angeles Planning Department, 1996.*

<sup>2</sup> *Environmental and Public Facilities Maps, Los Angeles City Planning Department, Citywide Division, September 1, 1996.*

<sup>3</sup> *Los Angeles Citywide General Plan Framework, Safety Element: Alquist-Priolo Special Study Zones & Fault Rupture Study Areas, Los Angeles Planning Department, 1996.*

for large parts of the City of Los Angeles and the region. The Proposed Project will be required to comply with existing codes which reduce seismic risks to an acceptable level; thus, the Proposed Project will have a less than significant impact with regard to seismic ground shaking.

With regard to the criteria set forth in CEQA Section 15162 (a), the changes proposed by the Second Amendment would not result in any new significant geotechnical or geologic environmental effects or a substantial increase in the severity of any previously identified impacts associated with geology or geotechnical hazards. Therefore, the preparation of a subsequent EIR is not warranted.

## **HYDROLOGY / WATER QUALITY**

### **Environmental Findings of 1986 Howard Hughes Center EIR**

To mitigate any potential adverse impacts associated with flooding and hydrology, the HHC EIR required the following drainage facilities be constructed as part of the planned 69-acre development: a) an on site drainage system; b) a storm drain system to convey the flow not controlled by the County's Project #81 from Airport Boulevard to the culvert under Sepulveda Boulevard; c) the re-grading of the existing drainage channel from Arizona Place downstream to the two existing corrugated metal pipe inlets; and d) upon approval of Culver City and the Los Angeles County Department of Public Works, the extension of the existing County drain to the boundary line between the City of Los Angeles and Culver City. Completion of the above requirements to the satisfaction of the City Engineer was concluded to have successfully reduced any impacts to a less than significant impact. According to the Seventeenth Annual Review of the HHC Development Agreement, these improvements were completed by November 1990 and have resulted in a greater improvement than originally intended in the Development Agreement.

### **Environmental Findings of 1998 Howard Hughes Entertainment Center EIR**

The Howard Hughes Entertainment Center EIR did not include a detailed drainage or hydrological analysis, as it was determined in the Initial Study that the project did not have the potential to create significant drainage impacts. The Initial Study concluded that drainage improvements implemented as part of the HHC project were adequate to accommodate or mitigate any impacts of the proposed development. No further analysis was warranted.

### **Environmental Effects of Proposed Amendment**

The Proposed Project would not result in any direct discharge into surface waters, or in any degradation of surface water quality aside from what can reasonably be anticipated to occur during the construction process. Development of the remaining undeveloped parcels within HHC are subject to the current National Pollution Discharge Elimination System (NPDES) requirements, which prescribe mandatory best management practices (BMPs) to control surface water runoff during the construction process to mitigate potential water quality impacts. Mandatory compliance with the NPDES is

implemented through permit approval process of the State Regional Water Quality Control Board (SWRCB), which is administered at the local level through local district offices. Prior to approval of a grading permit, the Project Applicant will be required to submit a detailed storm water pollution prevention plan (SWPPP) for the construction process detailing the BMPs that will be implemented during construction and the design of the Proposed Project. With adherence to the NPDES permitting requirements, potential impacts associated with water quality would be reduced to less than significant levels.

The five remaining undeveloped parcels have been graded and prepared for development. Surface water runoff currently percolates on site with excess water runoff draining into the existing storm water infrastructure system within HHC. The impact of developing these five parcels was evaluated in previous environmental analyses for the HHC Project. The exchange of hotel rooms for an equal amount of residential dwelling units would not induce any substantial changes to the development's drainage plan for future build-out of HHC. Any future buildout would be designed to connect to the existing storm water infrastructure in HHC, which has already been designed to accommodate increased runoff from development of the current planned density. The HHC Development Agreement is entitled and approved to accommodate a maximum of 1,950,000 square feet of commercial floor area, 250,000 square feet of entertainment center uses and 600 hotel rooms. The exchange of hotel rooms for an equal amount of residential dwelling units would not increase the overall density of the Project and would not result in any increases to the capacity of the planned and developed storm water infrastructure currently serving the site. Therefore, there would be no impact to the capacity of existing or planned storm water drainage systems as a result of the Second Amendment to the HHC Development Agreement. Furthermore, as stated above, future development of the remaining five parcels would be subject to the current NPDES permitting requirements to mitigate against any potential water quality impacts associated with polluted runoff. Appropriate catch basins to retain the first ¼ inch of rainfall during a storm event and debris filters will be installed at strategic locations in accordance with the SWPPP which is a mandatory requirement under the NPDES permitting process. Consequently, the potential for any erosion or siltation from the site would be reduced to less than significant levels.

Based on the above analysis including the conclusion that the potential for any erosion or siltation from the site would be reduced to less than significant levels, under CEQA Section 15162 (a) the changes proposed by the Second Amendment would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Thus, the preparation of a subsequent EIR is not warranted.

## LAND USE AND PLANNING

### Environmental Findings of 1986 Howard Hughes Center EIR

At the time the 1986 HHC EIR was prepared the project site was zoned R1-1 and M1-1. The M1-1 zone permitted the uses proposed under the proposed HHC Project. As part of the entitlement process, a zone boundary adjustment was required to adjust the R1 and M1 zones to match the proposed pattern of development. R1 zoning was retained to cover 5.4 acres over the then-existing 1.6 acres that were zoned R1.

The HHC Development Agreement, as approved in 1986, established the allowable development density and uses as follows:

- 1) A maximum of 1,950,000 square feet of commercial office and retail development, including, at the Company's option, a maximum of 100,000 square feet of retail and a maximum of 100,000 square foot fitness center;
- 2) A maximum of 600 hotel rooms; provided, however that the Company may construct up to a maximum of 1,500 total hotel rooms by exchanging 301 square feet of commercial office/retail space for each additional hotel room; and
- 3) Public and Private improvements, partially consisting of major road improvements and other infrastructure described in Exhibit C to the Development Agreement ("The Transportation Improvements").

Pursuant to the terms of the Development Agreement, HHC development is to be constructed in four phases in accordance with the conditions established in the Project Approvals (as defined in Section I.H. of the Development Agreement) and with the Applicable Rules (as defined in Section I.A. of the Development Agreement).

### Environmental Findings of 1998 Howard Hughes Entertainment Center EIR

The 1998 Howard Hughes Entertainment Center EIR did not address land use within the scope of the EIR. The proposed amendment to the HHC Project was determined to be substantially consistent with the allowable land use and General Plan designations and, subsequent to the 1998 approval of the Entertainment Center, the Development Agreement was specifically amended to permit a 250,000 square foot entertainment/retail center within the HHC development, in lieu of 750,000 square feet of commercial office development.

### **Environmental Effects of Proposed Amendment**

HHC is a planned commercial development, which in its present terms, and among other uses, would allow for the development of 600 hotel rooms. Under the Proposed Amendment, the Project would allow for an even exchange of hotel rooms for residential dwelling units. The conversion of the Development Agreement to allow residential dwelling units in lieu of hotel rooms would be consistent with the existing and established General Plan and Zoning designations for the site. As discussed above, the HHC Project is a planned development that was approved in 1986 and amended in 1998. The intensity, building heights and uses set forth in the Second Amendment are currently permitted by and consistent with the 1986 approved Tract Map No. 35269, as modified by the City Council in 1998, and the zoning of the property. The underlying zoning of the site is C2, which permits multi-family residential uses by right. As such, the amendment of the Development Agreement to allow an in-kind exchange of hotel rooms for residential units would be consistent with the current zoning and General Plan designations. Therefore, the Proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Proposed Project.

With regard to CEQA Section 15162 (a), the changes proposed by the Second Amendment would not result in any new impacts, or increase the severity of impacts, with respect to zoning or land use consistency. The equal exchange of residential uses for hotel rooms could potentially result in a project that is more compatible with the surrounding residential neighborhoods and provide a mixed-use buffer or transition zone between commercial uses and low density housing. Thus, the preparation of a subsequent EIR is not warranted.

### **NOISE**

#### **Environmental Findings of 1986 Howard Hughes Center EIR**

As documented in the environmental findings for the 1986 HHC EIR, the proposed HHC development was anticipated to reduce existing ambient noise levels by up to 6.0 decibels (dBA) due to noise attenuation improvements. However, the traffic generated by the proposed development would increase noise levels at the extreme east end of the project site, on both sides of Sepulveda Blvd at the southwest corner of the project site and along Centinela Ave, east of Green Valley Circle by as much as 2.0 dBA. The EIR concluded that while the project will in all respects comply with the applicable provisions of the City Noise Ordinance (No. 144,331), these increases to ambient noise levels from mobile noise sources may be considered significant under CEQA.

Accordingly, a Statement of Overriding Considerations was adopted for this unavoidable significant impact.

### **Environmental Findings of 1998 Howard Hughes Entertainment Center EIR**

The 1998 Howard Hughes Entertainment Center EIR concluded that construction-related noise levels could temporarily exceed exterior noise thresholds for the nearest office uses within HHC. The project's construction impacts were concluded to be less than significant as construction activities were not located within 500 feet of any residential or other noise sensitive land uses. Noise levels due to construction activities at the nearest residential receptors were estimated to range from 60-70 dBA which was below the significance threshold.

Noise levels from the operation of the project would be attributable to trips entering and leaving the project site. Assuming a worst-case scenario, noise attributable to project traffic was projected to have a maximum increase in noise levels of 1.8 dB over future no project noise levels. As this maximum increase is less than the 3 dB increase that is normally required to be audible, cumulative traffic-related noise impacts were concluded to be less than significant.

### **Environmental Effects of Proposed Amendment**

The Proposed Project would not result in any changes to construction-related noise impacts, as the types of construction activities associated with the construction of hotel uses are similar in nature to those involved with constructing multi-family residential uses. Under the terms of the existing HHC Development Agreement, construction activities are regulated under the approved Tract Map (No. 35269) conditions and mitigation measures. Development of the remaining portions of the HHC Project will be subject to the same mitigation measures previously required. Specifically, such conditions include restricting construction activities (except for construction of interior tenant improvements) between the hours of 7:00 a.m. and 9:00 p.m. only and in accordance with Section 41.40 of the Los Angeles Municipal Code. Since development of residential units in place of hotel rooms will be subject to the mitigation measures previously required, the level or severity of anticipated construction noise impacts would not change.

The proposed Second Amendment to the HHC Development Agreement would allow for an exchange of hotel rooms for an equal number of residential dwelling units. The proposed amendment does not increase the allowable density of HHC. Similar to hotel uses, the primary noise generation factor for multi-family residential uses is traffic-related noise. The future, final phase build-out of HHC, including the proposed change to multi-family residential uses, would be subject to the existing approved Tract Map and TDM conditions that require a reduction in vehicle trips by 17 percent and a maximum vehicle cap of 4,785 p.m. peak hour inbound and outbound project-related vehicle trips. The Proposed Project would not generate additional trips beyond the trip cap (see Appendix A). As such, development of 600 residential units in lieu of 600 hotel rooms would not result in a substantial change in trip generation and traffic-related noise impacts would be substantially the same as previously anticipated.

With regard to CEQA Section 15162 (a), because the changes proposed by the Second Amendment would not result in any new significant noise impacts or result in a substantial increase in the anticipated noise levels previously identified, the preparation of a subsequent EIR is not warranted.

## POPULATION AND HOUSING

### Environmental Findings of 1986 Howard Hughes Center EIR

The 1986 HHC EIR found the Proposed Project to be either consistent with the Southern California Association of Government's (SCAG) "Growth Forecast Policy" or, if it was marginally inconsistent, that the underlying policies related to actions by SCAG, itself and did not impose conclusions on or require actions by the City, as a Lead Agency, or the Proposed Project. Specifically, the EIR found the project to be marginally inconsistent with provision c. of Policy 15 of the Growth Forecast Policy, which states:

*"For subregions that are currently job-rich/housing deficient....*

- c. In SCAG review of development proposals, oppose industrial or commercial development which would result in a level of employment which would exceed the SCAG-82 Forecast, unless it can be demonstrated that sufficient housing will be provided within the subregion to accommodate the additional employment. Work with other governmental agencies to incorporate this criterion into their project approval process." (SCAG 82-Growth Forecast Policy)*

While this marginal inconsistency was called out in the EIR, the analysis concluded that impacts upon regional growth would be less than significant.

### Environmental Findings of 1998 Howard Hughes Entertainment Center EIR

The 1998 Howard Hughes Entertainment Center EIR did not address housing or population growth as no new housing units were proposed at that time.

### Environmental Effects of Proposed Amendment

As part of its comprehensive planning process for the Southern California region, the Southern California Association of Governments (SCAG) has divided the region into 13 subregions. The Proposed Project site is located within the City of Los Angeles subregion, which includes all areas within the boundaries of the City of Los Angeles. In 2000, the City of Los Angeles Subregion had an estimated permanent population of 3,823,062 persons and approximately 1,276,318 housing units. By the year 2005, SCAG forecasts an increase to 4,030,730 persons (a 5.2 percent increase) and 1,323,238 housing units (a 3.5 percent increase). Between the years 2005 and 2020, SCAG forecasts an increase to 4,628,339 persons (a 13 percent increase) and 1,632,598 housing units (an 18.9 percent increase). A summary of population and housing demographics for the Westchester/Playa Del Rey Community

Planning Area is presented in Table 3, below. As indicated in Table 3, the Westchester/Playa Del Rey Planning Area included a total population of 52,608 persons in 2002 with a total of 22,960 housing units. This equates to an average of approximately 2.3 persons per household. Applying this figure to the Proposed Project, the Proposed Project can be expected to generate a total resident population of 1,380 persons if 600 multi-family dwelling units are developed. This represents an increase of 0.03 percent to the total resident population in the Westchester/Playa Del Rey Planning Area, which would not represent substantial population growth within the area. Due to the strong demand for housing in the area, the minor increase in housing supply (600 units) would be considered a beneficial impact. Moreover, the Proposed Project retains the flexibility to build hotel rooms, in which case no permanent residents or dwelling units would be generated. In that case no impact would be created.

**Table 3**  
**Summary of Population and Housing Demographics**  
**for the Westchester/Playa Del Rey Community Planning Area**

	<i>Census 1990</i>	<i>Census 2000</i>	<i>2002 Estimate</i>
<b>Total Population <sup>1,2</sup></b>	48,003	51,255	52,608
Annual Growth Rate	n/a	0.66%	1.05%
Population/Density (per square mile)	3,487	3,723	3,822
<b>Total Housing Units</b>	22,602	22,794	22,960
Annual Growth Rate	n/a	0.08%	0.29%
<b>Single-family Housing Units <sup>3</sup></b>	9,925	10,168	10,088
Annual Growth Rate	n/a	0.24%	-0.32%
<b>Multiple-family Housing Units <sup>4</sup></b>	12,433	12,620	12,866
Annual Growth Rate	n/a	0.15%	0.78%
<b>Nonsingle-family Housing Units <sup>5</sup></b>	12,677	12,626	12,872
Annual Growth Rate	n/a	-0.04%	0.77%
<b>Notes:</b>			
1. Resident Population consists of those who live in housing units in the same area covered by Total Population. It is equal to "Total Population in Households".			
2. Group Quarters Population includes persons in student dormitories, military barracks, prisons and health care institutions. Group Quarters and Resident Populations sum to Total Population.			
3. Single-family Housing Units (SfHUs) only include detached dwellings.			
4. Multiple-family Housing Units (MfHUs) include apartment buildings (both for rent and condominiums), duplexes, artist-in-residence lofts, and attached single-family housing units.			
5. Nonsingle-family Housing Units (NshUs) add mobile homes, boats, and other living quarters to MfHUs. Its sum with SfHUs yield all living quarters for residents of the census tract. This value is consistent with the definitions used by the Southern California Association of Governments (SCAG) and the California Department of Finance (DoF).			
Source: Los Angeles Department of City Planning / Demographic Research Unit / November 2003, accessed at <a href="http://www.lacity.org/PLN/">http://www.lacity.org/PLN/</a>			

The Proposed Project would not result in any new significant environmental effects or a substantial increase in the severity of impacts associated with population and housing projections. Rather, the equal exchange of residential units for hotel rooms would further promote regional planning goals to increase housing opportunities in the subregion. As such, the preparation of a subsequent EIR is not warranted under Section 15162(a).

## **PUBLIC SERVICES- FIRE PROTECTION**

### **Environmental Findings of 1986 Howard Hughes Center EIR**

As documented in the environmental findings and conditions of approval for the HHC Development Agreement, impacts upon fire protection service were determined to be mitigated to a less than significant level with incorporation of the following mitigation measures: a) all site plans shall be submitted to and approved by the Fire Department; b) all access roads are required to be accessible to Fire Department vehicles, c) all private fire hydrant systems require a Fire Department permit, d) all hydrant installations and enlargements are to be completed prior to any street paving; and e) all structures are to include sprinkler systems, as determined to be necessary by the Fire Department.

### **Environmental Findings of 1998 Howard Hughes Entertainment Center EIR**

The 1998 Howard Hughes Entertainment Center EIR did not address fire protection services within the scope of the EIR, as this issue was determined in the Initial Study analysis to be less than significant.

### **Environmental Effects of Proposed Amendment**

Approval of the Proposed Project would allow an in-kind exchange of hotel rooms for an equal amount (600) of residential dwelling units. The proposed amendment to the HHC Development Agreement would not otherwise change the approved density or scale of HHC planned development. As such, the proposed change would not increase impacts upon fire protection services beyond what has already been analyzed and anticipated. Furthermore, the continued build-out of the HHC Project would be subject to the mitigation measures identified above. Therefore, with the implementation of these required mitigation measures, project impacts under the Development Agreement, as amended by the Second Amendment, would be reduced to less than significant levels.

With regard to the criteria set forth in CEQA Section 15162 (a), the changes proposed by the Second Amendment would not result in any new significant environmental effects upon fire protection services or result in a substantial increase in the severity of any previously identified impacts. Therefore, the preparation of a subsequent EIR is not warranted.

## **PUBLIC SERVICES - POLICE**

### **Environmental Findings of 1986 Howard Hughes Center EIR**

The HHC EIR concluded that, based upon the environmental findings and conditions of approval for the HHC Development Agreement, impacts upon police protection services would be mitigated to a less than significant impact levels with incorporation of the following mitigation measure: The Tract Map (No. 35269) approval requires the subdivider to submit a map of the completed project to the Los Angeles Police Department Pacific Area Commander.

### **Environmental Findings of 1998 Howard Hughes Entertainment Center EIR**

The 1998 Howard Hughes Entertainment Center EIR did not address police protection services within the scope of the EIR, as this issue was determined in the Initial Study analysis to be less than significant.

### **Environmental Effects of Proposed Amendment**

The substitution of residential dwelling units for an equal amount of hotel rooms would not generate any more demands for police protection services as such substitution would not otherwise increase the density of the planned development. Furthermore, demands upon police services are not anticipated to increase as a result of developing residential units in exchange for hotel rooms. Similar to hotel operations which operate on a 24-hour-a-day-basis, residential uses provide eyes-on-the-street at all times of the day and night. The constant presence of people serves as an effective deterrent against crime and vandalism, thus reducing demands for police services. As such, demands for police services would be substantially the same. With the implementation of the above described mitigation measures Proposed Project impact would be reduced to less than significant levels.

With regard to the criteria set forth in CEQA Section 15162 (a), the changes proposed by the Second Amendment would not result in any additional demands for police services or result a substantial increase in the demands previously anticipated. Therefore, the preparation of a subsequent EIR is not warranted.

## **PUBLIC SERVICES - SCHOOLS**

### **Environmental Findings of 1986 Howard Hughes Center EIR**

School services were not analyzed within the scope of the 1986 HHC EIR.

### **Environmental Findings of 1998 Howard Hughes Entertainment Center EIR**

The 1998 Howard Hughes Entertainment Center EIR did not address school services within the scope of the EIR. This issue was determined in the Initial Study analysis to be less than significant.

### Environmental Effects of Proposed Amendment

The Proposed Project would generate minor permanent population growth, which, in turn, would increase student generation within the jurisdictional boundaries of the Los Angeles Unified School District (LAUSD). As residential uses were not previously proposed or contemplated within prior environmental analyses for the HHC development, the following analysis addresses this issue.

The LAUSD provides school services within the project area. There are no school facilities on or immediately adjacent to the project site. The project area is served by the following LAUSD public schools: Westport Heights Elementary (grades K-5), located at 6011 West 79<sup>th</sup> Street; Wright Middle School (grades 6-8), located at 6550 West 80<sup>th</sup> Street; and Westchester High School (grades 9-12), located at 7400 Manchester Avenue. According to the LAUSD's School Facilities Fee Plan student generation rates, the Proposed Project will generate approximately 262 students with a 600-unit residential development (see Table 4, below).

**Table 4**  
**Estimated Student Generation by the Proposed Project**

Proposed Project	Size	Total Elementary School Students (0-199)	Total Middle School Students (0-122)	Total High School Students (0-116)	Total School Students Generated
600 Multi-family Residential Units	600 du	119	73	70	262
<i>Factors rounded to the nearest whole number.</i>					
<i><sup>a</sup> Source: School Facilities Fee Plan, LA Unified School District, March 2, 2002.</i>					

As shown in Table 5, a development project with 600 residential units in lieu of 600 hotel rooms would be adequately served by the schools serving the project site. A 600-unit residential development would generate approximately 262 students, resulting in enrollments under capacity at the three affected schools. While the Project is not expected to overcrowd neighborhood schools, the California Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities. As provided in Section 65996 of the California Government Code, the payment of such fees is deemed to fully mitigate the impacts of new development on schools. The School Facilities Fee Plan (March 2, 2000), for the LAUSD, has been prepared to support the school district's levy of the fees authorized by Section 17620 of the California Education Code. Per section 65995.5-7 of the Government Code, the Level 1 residential developer fees have been imposed at a rate of \$3.73 per square foot on new

residential construction within the boundaries of the LAUSD.<sup>4</sup> As the Project Applicant (or merchant developer) would be required to pay all applicable developer fees to the LAUSD pursuant to Government Code Section 65995-7, potential impacts upon school facilities would be mitigated to a less than significant level. Therefore, impacts would be less than significant.

**Table 5**  
**Public School Impact Summary by the Proposed Project**

School	Enrollment Capacity	2001-2002 Enrollment	Project Generated Students	Future Enrollment with Proposed Project	(-) Under (+) Over Capacity
Westport Heights—Elementary (grades K-5)	736	562	119	681	-55
Wright Middle School (grades 6-8)	1,569	1,256	73	1,329	-240
Westchester High School (grades 9-12)	2,923	1,943	70	2,013	-910

Source: LAUSD's web site at <http://notebook.lausd.net/notebook/app/school/selector.jsp>, accessed February 2004.

With regard to the criteria set forth in CEQA Section 15162 (a), the changes proposed by the Second Amendment would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Therefore, the preparation of a subsequent EIR is not warranted.

#### **PUBLIC SERVICES – PARKS AND RECREATION**

##### **Environmental Findings of 1986 Howard Hughes Center EIR**

Park and Recreational facilities were not analyzed within the scope of the 1986 HHC EIR.

##### **Environmental Findings of 1998 Howard Hughes Entertainment Center EIR**

The 1998 Howard Hughes Entertainment Center EIR did not address parks or recreational services or facilities within the scope of the EIR. This issue was determined in the Initial Study to be less than significant.

<sup>4</sup> Los Angeles Unified School District (LAUSD), Accounting and Disbursements Division, Notice to Developer Owners, October 14, 2003. These rates are valid from October 14, 2003 to October 14, 2004 and are subject to change.

### **Environmental Effects of Proposed Amendment**

The Proposed Project would generate permanent population growth, which in turn would increase demands for parks and recreational facilities within the project area. As residential uses were not previously proposed or contemplated within prior environmental analyses for the HHC development, the following analysis addresses this issue.

The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. The Public Recreation Plan, a portion of the Service Systems Element of the General Plan of the City of Los Angeles, provides standards for the provision of recreational facilities throughout the City and includes Local Recreation Standards. The standard ratio of neighborhood and community parks to population is four acres per 1,000 people. However, the LADRP's current parkland ratio is approximately one acre per 1,000 people citywide. The existing HHC development incorporates a number of passive parks, bikeway paths and landscaped open space areas, along with a fitness center (the Spectrum Club). Such common areas are currently available to the patrons and visitors of the commercially developed portions of HHC and the Spectrum Club is currently available to commercial tenants of the HHC development. These uses, including the Spectrum Club, would also be readily accessible for future residents and/or commercial tenants of the HHC development. Development of the HHC with residential uses would generate a higher demand for recreational services and facilities than commercial uses, however, this impact will be mitigated to a less than significant level through the payment of a mandatory dwelling unit construction tax. Pursuant to Section 10.21.3 of the Los Angeles Municipal Code (LAMC), the City of Los Angeles imposes a mandatory dwelling unit construction tax to mitigate impacts upon park and recreational facilities. Funds generated by this tax are required to be placed in a "Park and Recreational Sites and Facilities Fund," to be used exclusively for the acquisition and development of park and recreational sites and facilities. Any future residential development on the HHC site would be subject to this tax. Therefore, potential impacts upon neighborhood or regional parks would be mitigated to a less than significant level.

Furthermore, if the development were to include "for sale" units, the applicable provisions of Section 17.12 of the LAMC would also apply, requiring the Project Applicant (or merchant developer) to pay applicable Quimby fees to the City of Los Angeles. Such fees are used exclusively for the acquisition and development of park and recreational sites and facilities. Therefore, if a "for sale" residential development were to occur under the amended Development Agreement, the Proposed Project's impact upon parks and recreational facilities would be mitigated to a less than significant level.

With regard to the criteria set forth in CEQA Section 15162 (a), the changes proposed by the Second Amendment would not result in any new significant impacts upon parks or recreational facilities or result a substantial increase in the severity of previously identified impacts. Therefore, the preparation of a subsequent EIR is not warranted.

## **TRANSPORTATION AND TRAFFIC**

### **Environmental Findings of 1986 Howard Hughes Center EIR**

The 1986 HHC EIR concluded that traffic generated by the project would cause significant impacts at critical intersections along Sepulveda Boulevard and Centinela Avenue in the project vicinity. The Tract Map approval included a trip cap which provides that development at HHC may not generate, under any circumstances, more than 4,785 p.m. peak hour inbound and outbound trips (reflecting the achievement of a 17 percent trip reduction). The implementation of a comprehensive TDM Program, which includes goal setting (17 percent reduction), overall coordination by independent company monitoring (submission of a semiannual and subsequently annual reports on the effectiveness of the program to the Department of Transportation and the Advisory Agency), and enforcement (contracting with a consultant to devise an enforcement plan), was required to be wide in scope and may contain rideshare and public transportation subsidies, preferential carpool/vanpool parking, other transportation modes, flexible work hours, variety of land uses and health club incentives. The project was also required to provide an internal circulation system, which is coordinated (including necessary traffic signals) with the existing system and is to be phased in order to sufficiently support the traffic generated with each phase. Additionally, HHC was required to make a number of improvements to the surrounding roadway system, including some improvements of a regional scale. While all of the foregoing would lessen the impact, no feasible mitigation measures would mitigate the total circulation impacts to levels of insignificance. During the peak p.m. periods, the EIR concluded that the HHC Project would result in significant impacts at critical intersections along Sepulveda Boulevard and Centinela Avenue in the project vicinity. A Statement of Overriding Considerations was adopted for the project's unavoidable significant operational traffic impacts.

### **Environmental Findings of 1998 Howard Hughes Entertainment Center EIR**

With implementation of the traffic mitigation measures proposed in the 1998 Howard Hughes Entertainment Center EIR, no significant traffic impacts were anticipated to remain at any of the identified study intersections. Project impacts at the 11 intersections previously identified as incurring significant impacts under the HHC EIR were found to have been mitigated to levels below the significance threshold.

### **Environmental Effects of Proposed Amendment**

The following discussion summarizes the findings and conclusions of Crain & Associates' Traffic Assessment for the Second Amendment to the HHC Development Agreement. Crain & Associates' Traffic Assessment includes a trip generation comparison of hotel rooms versus residential units, an assessment of actual trip generation at the HHC Project, a discussion of HHC's Transportation Mitigation Measures, and an assessment of future traffic conditions. In summary, this assessment concluded that the proposed Second Amendment to the HHC development Agreement would not result

in any significant traffic impacts above and beyond those that have already been anticipated and, where feasible, mitigated as part of development at HHC. A copy of the complete Traffic Assessment, dated March 8, 2004, is provided herein as Appendix A. A summary of the findings and conclusions of Crain's Traffic Assessment are as follows:

- The critical peak-hour trip generation rate for multiple-family residential and hotel uses are identical on a per unit basis under the governing Coastal Transportation Corridor Specific Plan (CTCSP) and quite similar according to the current Institute of Traffic Engineers (ITE) trip generation literature. The net change in trip generation due to the proposed multiple-family residential use versus the entitled hotel use would be slight and would not cause any significant traffic impacts or trigger the requirement for a traffic study.
- Taking into account the required HHC development 17 percent trip reduction mitigation measure, the trip cap for the completed HHC development is 4,785 PM peak-hour trips. Through its aggressive, ongoing TDM Program, HHC has continually achieved trip reductions well in excess of that required, as documented by driveway count surveys conducted over the last several years. The latest survey of February 26, 2004, shows the trip reduction level to be 44 percent, which is substantially better than the applicable Phase III requirement of 10 percent and the future Phase IV requirement of 17 percent. Should the proposed multiple-family residential use happen to generate more trips than the hotel use, those additional trips would be minor and have no significant impact due to the large trip reductions that HHC continues to achieve. In addition, any deviations in traffic attributable to the proposed multi-family residential use would not exceed the level of project impacts analyzed in the 1986 HHC EIR.
- HHC has already implemented all of its required physical transportation mitigation improvements, well ahead of schedule and at a cost of more than \$22,400,000. Since actual HHC traffic would likely continue to be substantially less than allowed or previously analyzed, there would be more than enough capacity from these physical transportation improvements to serve and mitigate the remaining HHC development, including the proposed residential use. The surplus capacity would serve other area development as well.
- A new traffic analysis is not warranted for the buildout of the remaining HHC entitlement, as there would be little or no difference in trips between the proposed residential use and the previously analyzed hotel use. The trips generated by the existing and remaining HHC uses are also expected to be much less than analyzed and mitigated in the original HHC EIR due to the highly successful TDM Program. Therefore, such a study would not identify any new significant impacts or substantial increases in the severity of previously identified significant effects. Furthermore, when compared to information from the recent Playa Vista Phase 2 EIR (See Appendix A, Attachment B), the traffic impacts analysis in the

original HHC EIR was highly conservative as worse levels of service were predicted at a large majority of common key intersections than have actually occurred.

Because, based on the Crain & Associates Traffic Analysis, no new significant traffic impacts or substantial increases in previously identified significant traffic impacts were identified, no change or alteration to the trip reduction percentages or the trip cap of 4,785 PM peak-hour trips (the HHC Project's required transportation mitigation measures), is needed or is being requested by HHC as part of the Proposed Project. With regard to the criteria set forth in CEQA Section 15162 (a), the changes proposed by the Second Amendment would not result in any new significant traffic impacts or a substantial increase in the severity of previously identified significant traffic impacts. Therefore, the preparation of a subsequent EIR is not warranted.

#### **PUBLIC UTILITIES - ENERGY CONSERVATION**

##### **Environmental Findings of 1986 Howard Hughes Center EIR**

As stated in the energy conservation analysis for the 1986 HHC EIR, the project would increase demand for power by approximately 55.4 to 60.3 million kilowatt-hours per year (kwh/yr), approximately 90.1 to 105.7 million cubic feet/year (cf/yr) of natural gas, and 15,650 gallons per day (gpd) of gasoline. In addition, approximately 15,650 gallons/day of vehicle fuel would be consumed each working day. The Proposed Project would contribute to cumulative impacts of energy consumption of non-renewable sources, which impacts were considered significant and unavoidable.

A Statement of Overriding Considerations was adopted for the project's contribution to cumulative impacts of energy consumption of non-renewable sources.

##### **Environmental Findings of 1998 Howard Hughes Entertainment Center EIR**

The 1998 Howard Hughes Entertainment Center EIR did not address energy conservation as this issue was determined in the Initial Study analysis to be less than significant.

##### **Environmental Effects of Proposed Amendment**

The proposed Second Amendment to the HHC Development Agreement would not substantially affect the energy demands of the Proposed Project. The even exchange of hotel rooms for residential dwelling units would result in substantially equivalent energy use, both for construction and operation. Specifically, as provided in the SCAQMD CEQA Air Quality Handbook (1993), the standard operational electricity consumption rate for hotel uses is 9.95 kilowatt-hour/square foot/year. Based on a factor of 900 square feet per hotel room, this rate equates to roughly 8,955 kwh/yr/hotel room. The SCAQMD's standard electricity consumption rate for residential uses is 5,626.50 kwh/unit/year. Based on these consumption rates, an even exchange of hotel rooms for residential dwelling units would result

in a significant (37%) reduction in energy demands for the project. As the Proposed Project does not increase the overall density of the HHC project, no new energy demands would be created.

With regard to the criteria set forth in CEQA Section 15162 (a), the changes proposed by the Second Amendment would not result in any new significant energy consumption effects or a substantial increase in the severity of previously identified energy consumption effects. Therefore, the preparation of a subsequent EIR is not warranted.

#### **PUBLIC UTILITIES -SEWER**

##### **Environmental Findings of 1986 Howard Hughes Center EIR**

The 1986 HHC EIR estimated the project would generate approximately 699,000 gallons of wastewater per day (gpd), which would affect the treatment capacity of the Hyperion Treatment Plant (HTP). The EIR found that short-term impacts upon infrastructure could not be mitigated; however, with completion of the Hyperion Plant upgrade the long-term impacts would be less than significant.

A Statement of Overriding Considerations was adopted for the temporary and short-term impacts the project would have upon the sewerage infrastructure, prior to completion of the HTP upgrade.

##### **Environmental Findings of 1998 Howard Hughes Entertainment Center EIR**

The 1998 Howard Hughes Entertainment Center EIR did not address sewer impacts as this issue was determined in the Initial Study analysis to be less than significant.

##### **Environmental Effects of Proposed Amendment**

Wastewater generated by the Proposed Project would be of similar quality to that generated by other commercial projects, for which wastewater is treated by standard (primary, secondary, and tertiary) treatment processes. Whether constructed with residential uses or hotel uses, future build-out of the HHC Project would include low flush faucets and toilets, which would reduce wastewater generation. The Proposed Project would comply with all applicable wastewater treatment requirements of the Regional Water Quality Control Board (RWQCB). The Proposed Project would not dispose of industrial wastes into the wastewater system. Therefore, the Proposed Project would not exceed the wastewater treatment requirements of the applicable RWQCB and no mitigation measures are required.

The HHC Development Agreement was approved under the estimated calculation that the Project would generate approximately 699,000 gallons of wastewater per day. At the time of the previous evaluation, sewer infrastructure improvements were planned including upgrades to local sewers and the HTP, reconstruction of the Ballona Creek Pumping Plant, and construction of the Ballona Creek gravity sewer and force main. Since that time, the HTP has upgraded the capacity of its existing secondary treatment system twice, opened an additional primary treatment system, and built a new secondary

treatment system, which is partially in operation. In December of 1998, the HTP was upgraded to provide full secondary treatment for all influent based on an average dry weather flow of 450 million gallons per day (mgd). HTP currently processes approximately 360 mgd. The amount of wastewater generated by 600 hotel rooms is estimated at 130 gallons per room per day, for a total of 78,000 gpd. The amount of wastewater that would be generated by a residential project of 600 dwelling units would be estimated at 160 gallons of water per dwelling unit per day, or 96,000 gpd.<sup>5</sup> The net increase in wastewater generation resulting from an even exchange of hotel rooms for residential dwelling units is estimated to be 20 percent, or 18,000 gpd. Given the availability of treatment capacity available at the HTP for an additional 90 million gpd, the Proposed Project would not require the construction of new water or wastewater treatment facilities or expansion of existing facilities.

With regard to the criteria set forth in CEQA Section 15162 (a), the changes proposed by the Second Amendment would not result in any new significant impacts associated with wastewater treatment capacity nor would it result a substantial increase in the amount of wastewater previously anticipated as a result of the project. Therefore, the preparation of a subsequent EIR is not warranted.

#### **PUBLIC UTILITIES - SOLID WASTE**

##### **Environmental Findings of 1986 Howard Hughes Center EIR**

The findings for the 1986 HHC EIR estimated the proposed development would generate approximately 14,300 pounds of solid waste per day (lbs./day). The project would cumulatively contribute to the lifespan reduction of existing landfills, a potentially significant cumulative impact.

A Statement of Overriding Considerations was adopted for the project's contribution to cumulative impacts on the lifespan reduction of existing landfills.

##### **Environmental Findings of 1998 Howard Hughes Entertainment Center EIR**

The 1998 Howard Hughes Entertainment Center EIR did not address the issue of Solid Waste within the scope of the EIR as this issue was determined in the Initial Study analysis to be less than significant.

##### **Environmental Effects of Proposed Amendment**

A significant impact could occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate such additional solid waste. Solid waste generated in the City of Los Angeles is typically disposed of at the Sunshine Canyon Landfill north of Granada Hills, or the Bradley Landfill and Recycling Center in Sun Valley. However, facility expansions and new landfills are continuously being sought as existing facility

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<sup>5</sup> Wastewater generation rates provided by the City of Los Angeles Bureau of Engineering, March 2002.

capacity diminishes. Currently, Bradley Landfill has an estimated closure date of 2007 with an average daily intake of 2,250 tons per day. Bradley Landfill is in the process of expanding its facility to accommodate additional solid waste. The maximum allowable intake at the Bradley Canyon landfill is 10,000 tons per day. The Sunshine Canyon Landfill, located in Sylmar, has an estimated closure date of 2029 and has an average daily intake of 3,500 tons per day. The maximum allowable intake at the Sunshine Canyon landfill is 5,500 tons per day (See Table 6). Thus, both landfills' average daily intake amounts are below the respective permitted intake amounts. Also, mandatory City waste reduction and recycling programs are greatly reducing the amount of solid waste that would otherwise have entered area landfills.

**Table 6**  
**Los Angeles County Landfill Capacity and Intake**

Landfill Facility	Estimated Closure Date <sup>a</sup>	Permitted Daily Intake (tons per day)	Average Daily Intake (tons per day)
Sunshine Canyon Landfill (City portion)	2029	5,500	3,500 <sup>b</sup>
Bradley Landfill	2007	10,000 <sup>a</sup>	2,250 <sup>c</sup>

<sup>a</sup> California Integrated Waste Management Board, "Solid Waste Information System," April 9, 2003.  
<sup>b</sup> Correspondence with Los Angeles Office of the Board of Public Works, Karen Coca, May 21, 2003.  
<sup>c</sup> California Integrated Waste Management Board, "2002 Landfill Summary Tonnage Report," [www.ciwmb.ca.gov/Landfills/tonnage/2002/Landfill.htm](http://www.ciwmb.ca.gov/Landfills/tonnage/2002/Landfill.htm), May 20, 2003.

The solid waste impacts of HHC development were analyzed in previous environmental analyses. The HHC Project's CEQA environmental findings concluded that the HHC Project would cumulatively contribute to the reduction of the lifespan of existing landfills. The proposed Second Amendment to the HHC Development Agreement will not increase the overall density of the HHC Project. However, the changes will allow for an even exchange of hotel rooms for residential dwelling units. The solid waste generation rates for hotel rooms and residential dwelling units are estimated at 2 pounds per hotel room per day and 4 pounds per dwelling unit per day, respectively.<sup>6</sup> Based on an even exchange of 600 hotel rooms for 600 residential units, this change would increase the solid waste generation by approximately 1,200 lbs/day. However, with respect to hotel uses, this estimate does not account for any retail or commercial spaces that typically accompany a hotel use. Thus, the solid waste generation rates for hotel and residential uses would be generally comparable when waste generation from associated retail or commercial hotel uses are included, and approval of the proposed amendment would not induce a substantial change in solid waste generation and disposal needs. Further, the Tract Map Conditions of Approval require that any sales and/or lease agreements are to be fashioned to encourage buyers and

<sup>6</sup> City of Los Angeles, Bureau of Sanitation, *Solid Waste Generation*, 1981.