

lessees to develop active recycling programs to reduce the volumes of solid waste generated. Such conditions would still apply to any residential projects if they were developed in lieu of hotel uses. Therefore, solid waste impacts would be less than significant.

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 solid waste impacts nor would it result a substantial increase in the amount of solid waste generation previously anticipated. Therefore, the preparation of a subsequent EIR is not warranted.

PUBLIC UTILITIES – WATER AVAILABILITY

The existing HHC Development Agreement is approved and entitled to allow for 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 is consistent with the underlying Zoning and General Plan designations. Pursuant to Sections 10910-10915 of the State Water Code, projects are required to provide a water service assessment for any project with more than 500 residential dwelling units, commercial businesses over 500,000 square feet of space, and employing over 1,000 people. While this requirement was adopted into legislation after the HHC Development Agreement was originally executed, the Los Angeles Department of Water and Power (LADWP) has since prepared and repeatedly updated the Urban Water Management Plan which provides an estimate of available water resources to serve the City and future growth. The Urban Water Management Plan is based on existing and proposed land use development patterns, with the assumption that future growth occurs in a manner that is consistent with the existing zoning and General Plan policies of the City. For analysis purposes, water demand rates are typically estimated based on 120 percent of the wastewater load factors provided by the City of Los Angeles Bureau of Engineering. The net increase in wastewater generation resulting from a conversion of hotel rooms for residential units is estimated to be 20 percent, or 18,000 gpd. This corresponds to a water demand increase of 21,600 gallons of water per day. Since the proposed amendment would not increase the overall density of the Project and is consistent with the underlying zoning and General Plan designations, the water demand for the remaining build-out of the HHC has already been accounted for. As such, impacts upon water resources would be less than significant.

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 water demand impacts nor would they result in a substantial increase in the water demands previously anticipated for the Proposed Project. Therefore, the preparation of a subsequent EIR is not warranted.

**V. PREPARERS OF THE ADDENDUM
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VI. REFERENCES AND COMMONLY USED ACRONYMS

REFERENCES

California Code of Regulations

California Environmental Quality Act (CEQA), Sections 21000-21177 of the Public Resources Code, State of California, as amended January 1, 2001

California Government Code

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Los Angeles Citywide General Plan Framework, Safety Element: Inundation & Tsunami Hazard Areas in the City of Los Angeles, Los Angeles City Planning Department, 1996.

Los Angeles County Airport Land Use Plan, Los Angeles County Department of Regional Planning, 1991.

Sixteenth Annual Review of Howard Hughes Center Development Agreement. Report from Dale Neal, Latham and Watkins to Cone Howe, Director of Planning, c/o David Wienraub, Plan Approvals/Site Plan Review Unit, December 4, 2003.

ACRONYMS

AQMP	Air Quality Management Plan
AST	Above Ground Storage Tank
BMPs	Best Management Practices
CAJA	Christopher A. Joseph & Associates
CalEPA	California Environmental Protection Agency
CALTRANS	California Department of Transportation
CARB	California Air Resources Board
CEQA	California Environmental Quality Act
dB	decibel
dBA	A-weighted decibel scale
du	dwelling units
EIR	Environmental Impact Report
gpd	gallons per day
HHC	Howard Hughes Center
HTP	Hyperion Treatment Plant
I-405	San Diego Freeway
LADBS	Los Angeles Department of Building and Safety
LADRP	Los Angeles Department of Recreation and Parks
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAPD	Los Angeles Police Department
LAUSD	Los Angeles Unified School District
LARWQCB	Los Angeles Regional Water Quality Control Board
mgd	million gallons per day
NPDES	National Pollution Discharge Elimination System
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District

SWRCB	State Regional Water Quality Control Board
SWPPP	Storm Water Pollution Prevention Plan
TDM	Transportation Demand Management
tpd	tons per day
UWMP	Urban Water Management Plan

Appendix A

**Crain & Associates – Traffic Assessment of Change from Hotel to
Residential Use, Howard Hughes Center**

March 8, 2004

Crain & Associates

Of Southern California

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Telephone (310) 473-6508
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March 8, 2004

Mr. Shane Parker
Principal
Christopher Joseph & Associates
11849 W. Olympic Boulevard, Suite 101
Los Angeles, California 90064

RE: Traffic Assessment of Change from Hotel to Residential Use, Howard Hughes Center

Dear Mr. Parker,

Arden Realty, Inc. is requesting that the Development Agreement ("DA") for Howard Hughes Center (HHC) be amended in order to allow up to 600 multi-family dwelling units to be developed in lieu of the currently entitled 600 hotel rooms. Crain & Associates has made a traffic assessment of this requested change as described below.

Trip Generation Comparison

The HHC site is within the City's Coastal Transportation Corridor Specific Plan (CTCSP) area. The CTCSP contains peak-hour trip generation rates for the most common land uses, including multiple-family residential and hotel uses, which are to be applied to projects in the governed area. These trip rates are for the PM peak hour, which is the hour that most often experiences the heaviest traffic volumes in the City of Los Angeles. The CTCSP trip rate for apartments, condominiums and townhouses is 0.7 trips/dwelling unit, which on a "per unit" basis is identical to the CTCSP trip rate of 0.7 trips/room for hotels and motels. According to the CTCSP, therefore, 600 multiple-family dwelling units would generate the same number of peak-hour trips as the currently entitled 600 hotel rooms.

In terms of trip rates contained in the current Institute of Transportation Engineers (ITE) handbook, Trip Generation, 7th Edition, the reference most widely used by traffic engineering professionals regarding trip generation, the PM peak-hour trip rates are 0.62 trips/dwelling unit for apartments, 0.52 trips/dwelling unit for condominiums/townhouses, and 0.59 trips/room for hotels, all of which are higher than the ITE AM peak-hour rates for these uses. The PM peak-hour trip rates are again quite similar on a per unit basis. The minor difference of 0.03 between the apartment trip rate of 0.62 and the hotel trip rate of 0.59 could result in a slight increase of 18 peak-hour trips for 600 apartment dwelling units compared to that generated by 600 hotel rooms. In our opinion, these 18 additional trips would not cause a significant traffic impact and are well below the 42 trips threshold that the Los Angeles Department of Transportation uses to determine whether a traffic study may be required.

Actual HHC Trip Generation

The current level of HHC development is still within Phase III, with buildout being the completion of Phase IV. The DA requires that through Phase III, HHC achieve a PM peak-hour trip reduction of at least 10 percent relative to the Phase III base trip generation analyzed in the original HHC EIR. Upon commencement of Phase IV development, HHC is required to achieve an even higher trip reduction of at least 17 percent. Taking into account the 17 percent trip reduction, the trip cap for the completed HHC development is 4,785 PM peak-hour trips. Through its aggressive, ongoing Transportation Demand Management (TDM) Program, HHC has accomplished trip reductions well above these reduction targets, as evidenced by the several driveway traffic count surveys conducted by Crain & Associates over the last several years.

The first Crain & Associates driveway count survey occurred in October 1999. Then, as now, the level of HHC development was in Phase III. That survey determined that a PM peak-hour trip reduction of more than 16 percent was being achieved, compared to the 10 percent requirement. In October 2000, the Crain & Associates driveway count survey found a trip reduction of almost 40 percent during the PM peak hour, well in excess of the required 10 percent and the higher 17 percent that would be required in Phase IV. This trend continued as the driveway count survey in June 2001 determined an approximate 37 percent PM peak-hour trip reduction. Another driveway count survey later in the year, this one in October 2001, showed HHC achieving a PM peak-hour trip reduction of more than 49 percent. In November 2002, the Crain & Associates driveway count survey found a similar trip reduction, approximately 48 percent, during the PM peak hour.

As the last driveway count survey was more than a year old, Crain & Associates recently conducted another survey on February 26, 2004. At the time of this survey, the amount of occupied floor area in HHC totaled 1,474,338 gross square feet (which becomes 1,874,338 gross square feet when adjusted for the Promenade retail use). As shown in Attachment A, the allowable trip generation for this occupancy is 3,374 PM peak-hour trips, while the survey measured an actual peak-hour generation of 1,883 trips. Therefore, HHC is currently achieving a PM peak-hour trip reduction of 44 percent, further demonstrating the effectiveness of its TDM Program and its ongoing success in generating trips at levels much less than allowed.

Although it is not expected to materialize, should the proposed residential use generate more trips than the hotel use, those additional trips would be relatively minor and readily absorbed without any significant traffic impact due to the reduced level of trip generation that HHC continues to achieve. Also, to ensure the integrity of the environmental analyses that were approved for the development of HHC, including the transportation mitigation measures, no change or alteration to the trip reduction percentages or the trip cap of 4,785 PM peak-hour trips is being requested by HHC as part of this proposal. Therefore, any deviations in traffic occurring as a result of the proposed residential use would not exceed the level of project impacts analyzed in the original HHC EIR.

Transportation Mitigation Measures

In addition to the critical trip cap of 4,785 PM peak-hour trips, the DA requires that HHC implement an extensive program of physical transportation mitigation improvements in the area, including some of a regional scale. The DA allows these improvements to be constructed according to phases of development. However, at a cost of more than \$22,400,000, HHC has already completed all of the required physical mitigation improvements on the assumption that buildout of the entitled development would occur. As a result, capacity enhancements to the area freeway and street system have been provided well before many of the HHC traffic impacts have been generated. Furthermore, since the actual traffic generated by HHC would likely continue to be substantially less than allowed, more surplus capacity due to these improvements would be available for traffic attributable to the remaining HHC development, including the proposed residential use.

Future Traffic Conditions

A separate new traffic analysis of the impacts of the remaining HHC entitlement is not warranted. As discussed above, few, if any, net additional trips are expected to be generated by the proposed residential use. Also, the trips generated by the existing and remaining HHC uses are expected to continue to be substantially less than had been analyzed and mitigated in the original HHC EIR. Therefore, such an analysis would not identify any new significant traffic impacts.

It should also be noted that there is already a recent and relevant traffic analysis of conditions in the study area, which is provided in the Playa Vista Phase 2 ("PV 2") EIR. Attachment B, which compares the PV 2 analysis with the buildout traffic conditions forecast in the HHC EIR, indicates that current (2003) traffic conditions are actually better in 88 percent of the cases than were projected in the original HHC EIR, taking into account all cumulative traffic. In the three cases where current conditions are worse than they were projected to be in the original HHC EIR, the Level of Service is D, which is an acceptable level within the City of Los Angeles.

Conclusions

From the preceding traffic assessment, the following can be concluded:

- o 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 and quite similar according to the current 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 not cause any significant traffic impact or trigger the requirement for a traffic study.
- o Through its aggressive, ongoing TDM Program, HHC has continually achieved trip reductions well in excess of that required, as documented by driveway count surveys

Letter to Mr. Shane Parker
March 8, 2004
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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 residential use would not exceed the level of project impacts analyzed in the original HHC EIR.

- o 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 improvements to serve and mitigate the remaining HHC development, including the proposed residential use. The surplus capacity would serve other area development as well.
- o A new traffic analysis is not warranted for 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 project 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, the traffic impact analysis in the original HHC EIR was highly conservative as worse levels of service were predicted at a large majority of the common key intersections than have actually occurred.

If you have any questions, please call me.

Sincerely,



Roy Nakamura
Senior Transportation Engineer

RN:n
C14339
attachments

cc: Christopher Barton
Dale Neal

**ATTACHMENT A
HOWARD HUGHES CENTER
CURRENT BUILDING OCCUPANCIES AND TRIP GENERATION COMPARISON**

Building	Gross Square Footage	Occupancy 2/26/2004	Occupied Area
5999 Center Drive	158,435	100%	158,435
6060 Center Drive	233,414	96%	224,077
6080 Center Drive	279,157	93%	259,616
6100 Center Drive	272,056	61%	165,954
6601 Center Drive West	97,013	65%	63,058
6701 Center Drive West	301,150	94%	283,081
6801 Park Terrace	84,484	100%	84,484
Spectrum Club	35,632	100%	35,632
The Promenade	250,000	80%	200,000
Total:	1,711,341	86%	1,474,338

Driveway, Loading Dock, and Passenger Zones
PM Peak Hour (bet. 3:00 & 6:00) Traffic Volumes

Total = 1,883 (= 701 I/B + 1,182 O/B) on 2/26/2004

Allowable PM Peak-Hour Trip Generation of Occupied Area

2.0 trips/1,000 gsf x 0.90 (TDM trip reduction factor) x 1,274,338 = **2,294**

2.0 trips/1,000 gsf x 0.90 (TDM trip reduction factor) x 200,000 x 3 (retail adjustment factor) = **1,080**

Total: 3,374

Percent Trip Reduction, Actual vs. Allowable

(3,374 minus 1,883) / 3,374 = **44.2% reduction**

**ATTACHMENT A (CONT.)
HOWARD HUGHES CENTER
DRIVEWAYS AND LOADING ZONES TRAFFIC COUNT SUMMARY**

February 26, 2004	Driveways and Loading Zones		
15 Minute Counts	IN	OUT	TOTAL
3:00 - 3:15 PM	153	181	334
3:15 - 3:30 PM	177	224	401
3:30 - 3:45 PM	195	172	367
3:45 - 4:00 PM	201	166	367
4:00 - 4:15 PM	189	261	450
4:15 - 4:30 PM	164	227	391
4:30 - 4:45 PM	146	244	390
4:45 - 5:00 PM	158	214	372
5:00 - 5:15 PM	140	305	445
5:15 - 5:30 PM	160	273	433
5:30 - 5:45 PM	194	303	497
5:45 - 6:00 PM	207	301	508

Hourly Totals	IN	OUT	TOTAL
3:00 - 4:00 PM	726	743	1,469
3:15 - 4:15 PM	762	823	1,585
3:30 - 4:30 PM	749	826	1,575
3:45 - 4:45 PM	700	898	1,598
4:00 - 5:00 PM	657	946	1,603
4:15 - 5:15 PM	608	990	1,598
4:30 - 5:30 PM	604	1,036	1,640
4:45 - 5:45 PM	652	1,095	1,747
5:00 - 6:00 PM	701	1,182	1,883 *

* Highest 60-minute total