

IV. ENVIRONMENTAL IMPACT ANALYSIS

J. PUBLIC SERVICES

5. PARKS AND RECREATION

1. INTRODUCTION

This section analyzes the potential impacts of the proposed project on parks and recreational facilities. The project's provisions for park and recreational facilities and demand associated with residential occupants are evaluated in light of applicable City goals and regulatory requirements. Information regarding existing service ratios, as well as existing parks and recreational facilities surrounding the project site, was provided in part by the Los Angeles Department of Recreation and Parks (LADRP).

2. ENVIRONMENTAL SETTING

a. Regulatory Framework

(1) State Level

Section 66477 of the California Government Code, also known as the Quimby Act, was enacted by the California legislature in 1965 to promote the availability of park and open space areas in response to California's rapid urbanization and the need to preserve open space and provide parks and recreation facilities in response to this urbanization. The Quimby Act authorizes cities and counties to enact ordinances requiring the dedication of land, or the payment of fees for park and/or recreational facilities in lieu thereof, or both, by developers of residential subdivisions as a condition to the approval of a tentative map or parcel map. Under the Quimby Act, dedications of land shall not exceed three acres of parkland per 1,000 persons residing within a subdivision, and in-lieu fee payments shall not exceed the proportionate amount necessary to provide three acres of parkland, unless the amount of existing neighborhood and community parkland exceeds that limit. As the parkland standard is not exceeded in the West Los Angeles community plan area, the maximum exaction for the proposed project under the Quimby Act is three acres of parkland per 1,000 persons. Los Angeles Municipal Code (LAMC) Section 17.12 was authorized to support compliance with the Quimby Act. Compliance with the Quimby Act is discussed below as set forth in Section 17.12 of the LAMC.

(2) Local Level

The City of Los Angeles General Plan indicates that a park and recreation system should address standards in the following three areas: (1) sufficient land area reserved for parks and recreation; (2) appropriate distribution of park and recreational facilities throughout the City; and (3) a full complement of park and recreational facility types (i.e., active and passive recreation for all age groups) to accommodate a wide variety of users. Facilities should be provided at the neighborhood, community, and regional levels.

Within the City's General Plan, the Public Recreation Plan (PRP) establishes policies and standards related to parks, recreational facilities, and open space areas in the City. The PRP provides Citywide goals, objectives, and recommendations concerning parks and recreational facilities. In addition to the standards established in the PRP, park and open space requirements pursuant to the Quimby Act are also set forth in Sections

12.21 and 17.12 of the LAMC. The following provides information regarding both the PRP and applicable LAMC standards and requirements.

(a) Public Recreation Plan

Adopted in 1980 by the Los Angeles City Council, the PRP focuses on the development of physical facilities by emphasizing the provision of neighborhood and community recreation sites, including community buildings, gymnasiums, swimming pools, and tennis courts.³¹ To a larger extent, the PRP focuses on facility planning in residential areas, as these areas generate the greatest demand for parks and recreational facilities. The PRP also establishes general locations for future facilities based on a proposed service radii and projected population levels.

According to the standard park characteristics identified in the PRP, park facilities are discussed in terms of neighborhood parks and community parks. A neighborhood park is intended to provide space and facilities for outdoor and indoor recreation activities to serve the immediate neighborhood. Community parks are intended to serve several surrounding neighborhoods and are designed to serve a wider interest range than a neighborhood park.

Neighborhood parks typically include a lawn area, multi-purpose fields and/or courts (e.g., softball, soccer, basketball, and volleyball), playground apparatus, picnic areas, off-street parking, and a maintenance area. Although the ideal size for a neighborhood park is considered to be ten acres, such parks within the City of Los Angeles are typically one to five acres in size. Community Parks often include such facilities as a community building, multi-purpose fields, hard court areas, parking, maintenance service areas, and play areas. In addition to those facilities provided at a neighborhood park, community parks may also include baseball diamonds, football and soccer fields, tennis and handball courts, a swimming pool, and/or specialized facilities to meet the needs of the community. According to the PRP the ideal size for a community park is considered to be 15 to 20 acres.

The PRP also states that the allocation of acreage for neighborhood and community parks and recreational facilities should be based on the resident population within a park's service radius. The desired long-range standard for parks is two acres of neighborhood parkland per 1,000 residents and two acres of community parkland per 1,000 residents, for a combined total of four acres of parkland per 1,000 residents. Ideally, these service ratios would be reached within a half-mile service radius of a neighborhood park and within a one-mile service radius of a community park. However, the PRP also notes that these long-range standards may not be reached during the life of the PRP, and therefore, includes more attainable short- and intermediate-range standards of one acre of neighborhood parkland per 1,000 residents and one acre of community parkland per 1,000 residents, for a combined total of two acres of parkland per 1,000 residents. Under the short-term goals, these service ratios would be met within a one-mile service radius for neighborhood parks and within a two-mile service radius for community parks. The LADRP commonly uses the geographic area covered by the Community Plan rather than the park service radius to determine service ratios. The PRP also establishes that no park or recreational facility shall be diminished in size or removed from any service radius unless the required acreage is replaced elsewhere within that same service radius, or the need is diminished due to population and/or land use changes.

³¹ *City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan. Approved October 9, 1980.*

(b) Los Angeles Municipal Code

Section 12.21.G of the LAMC requires that all residential developments containing six or more dwelling units on a lot provide, at a minimum, the following usable open space area per dwelling unit: 100 square feet for each unit having less than three habitable rooms, 125 square feet for each unit having three habitable rooms, and 175 square feet for each unit having more than three habitable rooms. Section 12.21 of the LAMC also identifies what areas of a project would qualify as usable open space for the purposes of meeting the project's open space requirements. Usable open space is defined as areas designated for active or passive recreation and may consist of private and/or common areas. Common open space areas must be readily accessible to all residents of the site and constitute at least 50 percent of the total required usable open space. Common open space areas can incorporate recreational amenities such as swimming pools, spas, children's play areas, and sitting areas. A minimum of 25 percent of the outdoor common open space area must be planted with ground cover, shrubs, or trees. In addition, indoor recreation amenities cannot constitute more than 25 percent of the total required usable open space. Private open space is an area which is contiguous to and immediately accessible from an individual dwelling unit, may have a dimension no less than six feet in any direction and must contain a minimum of 50 square feet, of which no more than 50 square feet per dwelling unit can be counted towards the total required usable open space.

Section 17.12 of the LAMC, authorized under the Quimby Act, which requires developers to set aside land, donate conservation elements, or pay fees for park improvements, provides standards for parkland acreage requirements and identifies fees per dwelling unit. The area of land within a subdivision that is required to be dedicated for park and recreational uses is determined by the maximum residential density permitted by the zone within which the site is located. The project site is located within the C2 zone, which allows residential development pursuant to the standards established for the R4 zone. The project proposes 283 residential units. Therefore, based on the provisions set forth in LAMC Section 17.12, and, in the absence of any in-lieu fees or credits for private recreational areas, 32 percent of the gross subdivision area would be required to be dedicated as parkland since the project would result in more than 100 dwelling units per acre.

Section 17.12.F of the LAMC allows private recreational areas developed within a project site for use by the particular project's residents to be credited against the project's land dedication and/or in lieu fee requirement. Recreational areas that qualify under this provision of Section 17.12 include, in part, swimming pools and spas (when the spas are an integral part of a pool complex). Furthermore, in accordance with LAMC Section 17.12.F.1, the recreational areas proposed as part of a project must meet the following standards in order to be credited against the requirement for land dedication: (1) each facility is available for use by all of the residents of a project; and (2) the area and the facilities satisfy the park and recreation needs of a project so as to reduce that project's need for public recreation and park facilities.

b. Existing Conditions

The LADRP is responsible for the establishment, operation, and maintenance of parks and recreational facilities in the City of Los Angeles. Currently, the LADRP maintains over 15,000 acres of parkland with 400 neighborhood and regional parks (including Griffith Park, one of the largest municipal parks within the boundaries of an American city), 11 lakes, more than 180 recreation and community centers, two beaches plus the Venice Beach Ocean Front Walk, 26 licensed child care facilities, 13 golf courses, seven skate parks,

seven museums, and an urban forest of one million trees.³² The project site is located within the LADRP Pacific Region.

The City of Los Angeles has an estimated Citywide ratio of 0.70 acre of neighborhood and community parkland per 1,000 residents.³³ More specifically, the West Los Angeles Community Plan area, which includes Century City, has an estimated community ratio of 0.77 acre of neighborhood and community parkland per 1,000 residents.³⁴ These ratios do not meet the City's short- and intermediate-range neighborhood and community parkland standards under the PRP of one acre per 1,000 persons within a one-mile service radius for neighborhood parks, and one acre per 1,000 persons within a two-mile radius for community parks. According to the LADRP, the project site is located in a heavily populated area in which high numbers of youth, families, and seniors utilize local parks and recreational facilities. The LADRP has identified Holmby Park as the neighborhood park that would serve the project site, and Cheviot Hills Park and Westwood Park as the two community parks that would serve the project site.³⁵

Beverly Hills is located to the immediate south and east of the project site. The City of Beverly Hills Recreation and Parks Department (BHRPD) is responsible for the establishment, operation, and maintenance of parks and recreational facilities in the City of Beverly Hills. The BHRPD parks system consists of 76.7 acres of developed parkland in 13 parks, including seven mini parks and six major parks. The BHRPD also operates two community centers.³⁶ Given the City's current population of 34,132 people,³⁷ the Beverly Hills parkland-to-population ratio is approximately 2.24 acres of parkland per 1,000 residents. This ratio does not account for a joint powers agreement the City has with the Beverly Hills Unified School District (BHUSD) that provides for after school hour public access to the BHUSD's numerous facilities, including fields, courts, auditoriums, and parking facilities. The City of Beverly Hills uses as a standard of 2.5 acres of neighborhood parkland per 1,000 residents and 2.5 acres of district or community parkland per 1,000 residents. However, the General Plan Open Space Element notes the large quantity of private recreation facilities available and considers that standard to be unrealistic.³⁸ As shown below, the park nearest the project site is Beverly Hills' Roxbury Park. In May 2008, Beverly Hills approved the Roxbury Master Plan, which outlines improvements for Roxbury Park which includes a new 22,600 square foot facility, a renovated picnic area, a sand volleyball court, outdoor basketball court, and 4 lighted tennis courts, as well as other improvements. No timeline has been established for the completion of these improvements.

Table IV.J.5-1, Existing Parks and Recreational Facilities Located in the Vicinity of the Project Site, lists these three facilities, as well as the parks and recreational facilities located within three miles of the project site that would likely help serve residents of the project. **Figure IV.J.5-1, Parks and Recreational Facilities Located in the Vicinity of the Project Site**, depicts the location of these facilities in relation to the project site.

³² LADRP, *A Message from the General Manager* <http://www.ci.la.ca.us/RAP/dept.htm>, accessed April 4, 2011.

³³ Written correspondence from Michael A. Shull, Superintendent, LADRP. Received April 15, 2011.

³⁴ *Ibid.*

³⁵ Written correspondence from Michael A. Shull, Superintendent, LADRP. Received April 15, 2011.

³⁶ *City of Beverly Hills General Plan Update Technical Background Report, Chapter 4.2: Recreation and Parks. October 2005. Available at: <http://www.beverlyhills.org/civica/filebank/blobdload.asp?BlobID=2575>*

³⁷ *California Department of Finance. Table E-5: Population and Housing Estimates for Cities, Counties, and the State, 2010-2011. Available at: <http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php>. Accessed April 29, 2011.*

³⁸ *The Beverly Hills Hilton Revitalization Plan, Draft EIR, August 2007.*

Table IV.J.5-1

Existing Parks and Recreational Facilities Located in the Vicinity of the Project Site

Map No. ^a	Name and Address	Distance From Project Site	Type of Park	Size	Amenities
City of Los Angeles					
1	Holmby Park & Armand Hammer Pitch & Putt Golf Course ^b 601 Club View Dr.	0.9 mile	Neighborhood	8.52 acres	Barbeque pits, children's play area, picnic tables, the 18-hole Armand Hammer golf course, bowling greens, jogging path, and a waterfall
2	Cheviot Hills Park & Recreation Center ^b 2511 Motor Ave.	1.6 miles	Community	40 acres	Auditorium, barbecue pits, lighted and unlighted sports fields, lighted indoor and outdoor basketball courts, a children's play area, a community room (capacity of 80 to 100 persons), an indoor gym, picnic area, indoor volleyball courts, an archery range, petanque courts, tennis courts, and an amphitheater. This park also includes the Rancho Park Golf Course, described immediately below
3	Rancho Park Golf Course ^c 10460 West Pico Blvd.	1.6 miles	Regional	144.34 acres	9-hole, par 3 public golf course, double deck driving range, and a full size 18-hole golf course
4	Westwood Park & Recreation Center ^b 1350 South Sepulveda Blvd.	1.8 miles	Community	26.70 acres	Barbeque pits, lighted baseball diamond, indoor and outdoor basketball courts, children's play area, community room, indoor gym (without weights), picnic tables, and a boundless playground for wheelchair bound visitors
5	Irving Schachter Park 2599 Beverwil Dr.	2.3 miles	Small	0.75 acre	Does not offer any specialized recreational facilities
6	Westwood Gardens Park 1246 Glendon Ave.	2.4 miles	Small	0.29 acre	Not listed

Table IV.J.5-1 (Continued)

Existing Parks and Recreational Facilities Located in the Vicinity of the Project Site

Map No. ^a	Name and Address	Distance From Project Site	Type of Park	Size	Amenities
7	Robertson Recreation Center 1641 Preuss Rd.	2.4 miles	Neighborhood	1.21 acres	Lighted outdoor basketball courts, lighted handball courts, children's play area, community room, indoor gym (without weights), and picnic tables
8	De Neve Square Park 314 Beverly Glen Blvd.	2.8 miles	Neighborhood	2.0 acres	Not listed
City of Beverly Hills					
9	Beverly Gardens Park Along Santa Monica and Wilshire Blvds.	0.5 mile	Community	1.9 linear miles	Jogging path and walking paths, various gardens, arbors, and fountains
10	Roxbury Park 471 South Roxbury Dr.	0.8 mile	Community	Not listed	Lighted tennis courts, baseball diamond/soccer field, basketball courts, sand volleyball courts, lawn bowling, croquet, putting green, picnic tables, and children's play area
11	Will Rogers Memorial Park 9650 Sunset Blvd.	1.8 miles	Neighborhood	Not listed	Fountains, walkways, and restrooms

^a Corresponds with Map Nos. on Figure IV.J.5-1.^b These facilities were identified by the LADRP as directly serving the project site.^c Golf courses do not meet the definition of a neighborhood or community park established in the PRP and are not included in the overall park total acreage.

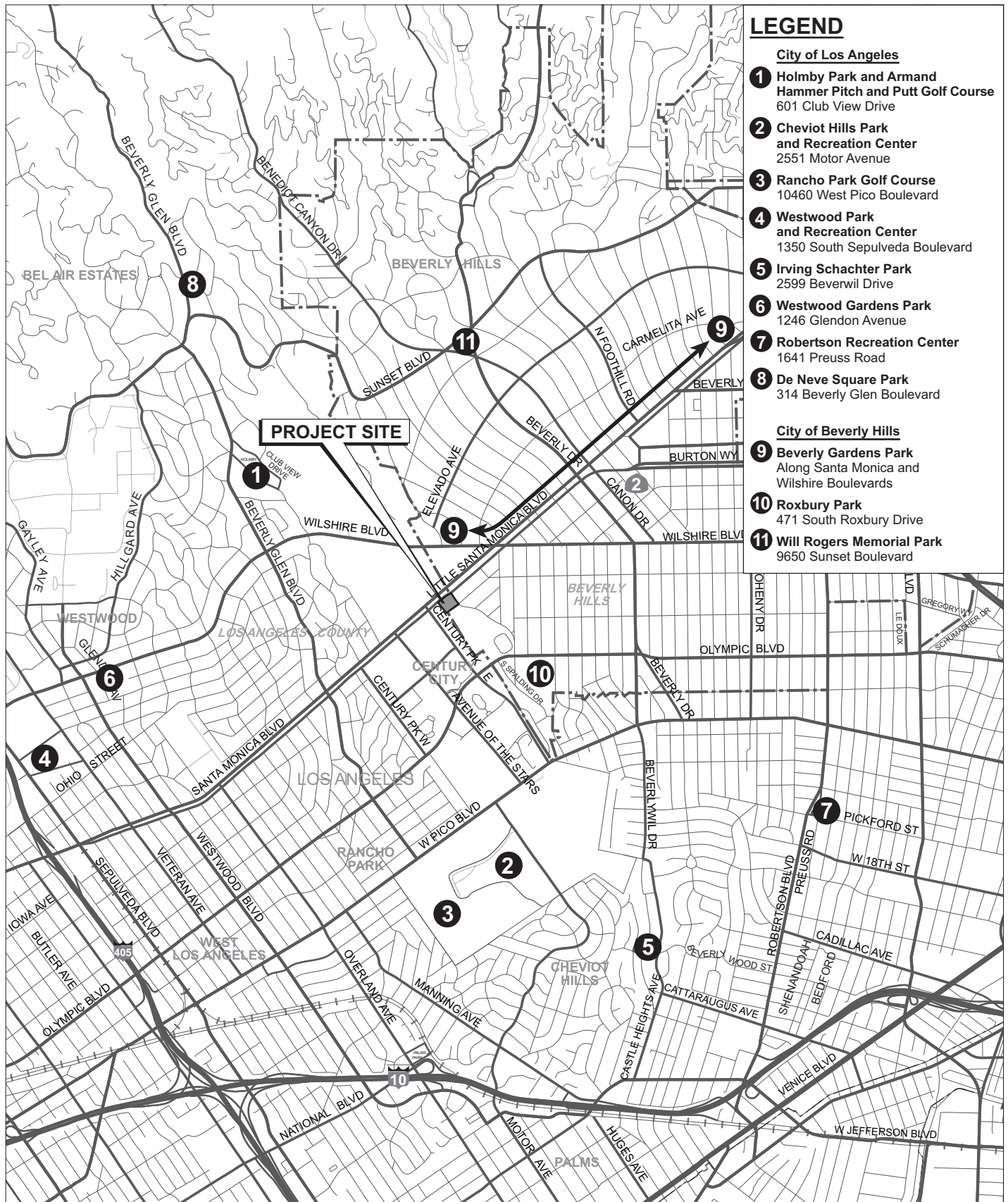
Source: LADRP. PCR Services Corporation, April 2011.

As noted in Table IV.J.5-1 and Figure IV.J.5-1, some of these parks and recreational facilities are located in the City of Beverly Hills.

3. PROJECT IMPACTS

a. Methodology

The analysis of parks and recreation impacts is based on comparing the park and open space ratio associated with the project to the standards set forth by the Quimby Act, the PRP, and the LAMC. To be consistent with the standards set forth in the aforementioned regulatory guidance documents, the analysis of impacts is based on the acreage of open space available per the project's estimated residential population.



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b. Significance Thresholds

Appendix G of the CEQA Guidelines provides a screening question that addresses impacts with regard to police protection service. This question is as follows:

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- Parks?

In the context of this question from Appendix G of the CEQA Guidelines, the *City of Los Angeles CEQA Thresholds Guide*, states that the determination of significance shall be made on a case-by-case basis, considering the following factors:

- The net population increase resulting from the proposed project;
- The demand for recreation and park services anticipated at the time of project build-out compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and
- Whether the project includes features that would reduce the demand for recreation and park services (e.g., on-site recreation facilities, land dedication or direct financial support to the Department of Recreation and Parks).

Based on these factors, the *City of Los Angeles CEQA Thresholds Guide* states that a project would normally have a significant impact on parks and recreation if:

PRK-1 The project requires the addition of a new park or recreation area; or the expansion, consolidation or relocation of an existing facility to maintain service.

c. Project Design Features

The proposed project would provide residents with common open space (including indoor recreational amenities) and private open space. Specifically, the proposed project would provide 82,052 square feet (1.88 acres) of common open space via approximately 43,141 square feet (0.99 acre) of ground-level landscaped open space, approximately 27,579 square feet (0.63 acre) of outdoor landscaped recreational area on a roof deck on top of the ancillary building, and approximately 11,332 square feet (0.26 acre) of indoor recreation facilities in the ancillary building. The approximately 43,141 square feet of ground-level landscaping would comprise approximately 41 percent of the project site. Recreation facilities located in the ancillary building would include a large indoor lap pool and a landscaped roof deck with outdoor pool, sundeck, hot tub and tennis court facility, and indoor fitness/gym facilities. The project would also provide 30,300 square feet (0.70 acre) of private open space in the form of terraces (i.e., balconies). Thus, the project would provide a total of 112,352 square feet (2.32 acres) of common and private open space (112,746 square feet with the automated parking system).

In addition, the project would implement a landscape plan that would complement and enhance the character of the project site as part of the proposed project. The landscape plan would support the concepts presented in the 2007 Greening of Century City Pedestrian Connectivity Plan, by enhancing the quality of the public thoroughfares and providing an appearance that is consistent with the overall landscaping concept for Century City. Mature trees, shrubs, and groundcover would be provided throughout the site. The Santa Monica Boulevard frontage would transition at the corner of Santa Monica Boulevard and Moreno Drive into a larger expanse of open space that would tie into the Moreno Drive frontage with mature specimen trees and dense planting to extend an overall garden feel from the project site out to the street. **Table IV.J.5-2, Summary of Proposed Project Open Space and Recreational Amenities**, summarizes the proposed project's open space and recreational amenities.

Table IV.J.5-2**Summary of Proposed Project Open Space and Recreational Amenities**

Amenity	Square Feet
Ancillary Building – Recreational Facilities (common)	11,332 square feet
Outdoor Open Space (common and private)	
Garden and perimeter (common)	43,141 square feet
Roof Deck (common)	27,579 square feet
Terraces (private)	30,300 square feet
Open Space Total	112,352 square feet

Source: Handel Architects; Melendrez.

d. Analysis of Project Impacts

The proposed project includes two parking options; a Conventional Parking Option and an Automated Parking Option. The Automated Parking Option allows for a minor increase in the amount of open space provided by the project (394 square feet), which would be added as a private terrace. Consequently, the Automated Parking Option would provide 112,746 square feet of open space (compared to 112,352 square feet of open space provided under the Conventional Parking Option). Although the difference in open space between the options is negligible, to provide a conservative analysis the project's potential impact under the Conventional Parking System is assessed.

(1) Public Recreation Plan

The PRP's desired long-range Citywide standard is two acres of neighborhood parkland per 1,000 persons and two acres of community parkland per 1,000 residents, for a combined total of four acres of parkland per 1,000 residents. However, as discussed above, the PRP also notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short and intermediate-range standards of one acre of neighborhood parkland per 1,000 persons and one acre of community parkland per 1,000 residents, for a combined total of two acres per 1,000 residents. Additionally, the State's Quimby Act allows a local jurisdiction to require a subdivision to provide a maximum of three acres per 1,000 persons in land dedication or fees, unless that particular jurisdiction is already exceeding that ratio.

According to 2010 census data, the residential population and the number of housing units in Century City represents a household size of approximately 1.34 persons per household.³⁹ Therefore, the proposed project's 283 dwelling units would generate approximately 379 new residents.

Without the provision of on-site open space, the project's 379 residents would require 1.516 acres of parkland (0.758 acres of neighborhood and community parkland respectively) to meet the PRPs long range standard of 4 acres per 1,000 people and 0.758 acres (0.379 acres of neighborhood and community parkland respectively) to meet the PRP's more attainable short and intermediate-range standard of 2 acres per 1,000 people.

To meet the project residents' need for park and recreation activities, the project would provide approximately 82,052 square feet (1.88 acres) of common open space and recreation area. This translates to a parkland-to-population ratio of 4.96 acres per 1,000 residents, thus exceeding both the long range and more attainable short and intermediate-range standards of 4.0 acres and 2.0 acres, respectively.⁴⁰ The 82,052 square feet (1.88 acres) consists of approximately 70,720 square feet (1.62 acres) of common outdoor open space (ground-level open space and roof deck) and approximately 11,332 square feet (0.26 acre) of common indoor recreation area in the ancillary building. The common open space and recreation area would include landscaped garden and seating areas, a large indoor lap pool and a landscaped roof deck with outdoor pool, sundeck, hot tub and tennis court facility, and indoor fitness/gym facilities. Thus, the project's common open space area would be considered "neighborhood park" space, as it would serve the residents of the proposed development (i.e., the "immediate neighbors") and includes features similar to those of a neighborhood park.

Also, it should be noted that this level of open space and recreation service is substantially greater than the existing service levels of 0.70 acres of neighborhood and community parkland per 1,000 residents City wide, and 0.77 acres of neighborhood and community parkland per 1,000 residents in the West Los Angeles Community Plan area. The project's parkland-to-population ratio would also exceed the current Beverly Hills ratio of 2.24 acres of parkland per 1,000 residents.

It is anticipated that residents would prefer the use of on-site facilities over public parks facilities primarily due to convenience and proximity. In this way, the project's provision of on-site open space and recreation facilities would reduce the use of area parks by project residents. Nonetheless, some project residents would still be expected to utilize nearby park amenities such as picnic areas, sports fields, and basketball courts. As a result, the proposed project could result in a small incremental increase in the use of area public parks.

However, given the fact that the proposed project would include 82,052 square feet (1.88 acres) of common open space and indoor recreational amenities (essentially providing its residents with an on-site "neighborhood park"), park use within both Los Angeles and Beverly Hills by project residents would be negligible and would not require the provision of additional facilities or alterations to existing facilities to maintain existing service ratios. Specifically, even in the conservative scenario that all project residents utilized area parks, the demand would not be enough to notably affect parkland-to-population ratios in

³⁹ Century City makes up the entirety Census Tract 2679.01. According to the 2010 Census data, there were 2,428 residents and 1,812 housing units in Century City, for an average 1.34 persons per household.

⁴⁰ $1.88 \text{ acres of common open space} \div 379 \text{ projected residents} = 4.96 \text{ acres per } 1,000 \text{ residents}$

either the West Los Angeles Community Plan area or the City of Beverly Hills. Due to the limited number of residents generated by the project and the provision of on-site common open space equivalent to a neighborhood park to accommodate these residents, the project's contribution to increased demand at area parks would be negligible. Therefore, impacts on parks and recreational services would be negligible and less than significant and would not require the addition of a new park or recreation area; or the expansion, consolidation or relocation of an existing facility to maintain service.

(2) Los Angeles Municipal Code

Pursuant to Section 12.21 of the LAMC, the proposed project would be required to provide a minimum of 175 square feet of usable open space area per dwelling unit.⁴¹ This amounts to 49,525 square feet (1.14 acres) of usable open space area based on the 283 units proposed. Of this amount, at least 50 percent (24,763 square feet or 0.57 acre) must be common open space area. Of the 49,525 square feet (1.14 acres) of common open space area required, a minimum of 25 percent (12,381 square feet or 0.28 acre) must be planted with ground cover, shrubs, or trees.

As discussed above, the proposed project would provide 82,052 square feet (1.88 acres) of common open space area via 43,141 square feet (0.99 acre) of ground-level landscaped open space, 27,579 square feet (0.63 acre) of landscaped recreation deck on top of the ancillary building, and 11,332 square feet (0.26 acre) of indoor recreation area in the ancillary building. The project would also provide 30,300 square feet (0.70 acre) of private open space in the form of terraces, for a total of 112,352 square feet (2.32 acres) of common and private open space. Therefore, the proposed project would exceed the required 49,525 square feet (1.14 acres) of usable open space area by 69,354 square feet (1.59 acres). Common open space provided by the project exceeds the required 24,763 square feet (0.57 acre) by 57,289 square feet (1.32 acres). With approximately 31,736 square feet of planted area, approximately 45% of the outdoor common open space would be planted. That exceeds the requirement that 25% of outdoor common open space be planted. Therefore, as demonstrated in this paragraph, the proposed project would exceed the open space requirements set forth in LAMC Section 12.21.

Section 17.12 of the LAMC, the City's parkland dedication ordinance enacted under the Quimby Act, provides a formula for satisfying park and recreational uses through land dedication and/or the payment of in-lieu fees. The area of land required for park and recreation dedication is based upon the maximum residential density permitted within the zone where it is located. As previously discussed, the project site is located within the C2 zone, which allows residential development pursuant to the standards established for the R4 zone. Therefore, the project site is permitted to be developed to a maximum density of over 100 dwelling units per acre. Thus, based on the provisions set forth in LAMC Section 17.12, 32 percent of the gross subdivision area would be required to be dedicated to the City of Los Angeles for park or recreational purposes. In the case of the proposed project, this would equate to a land dedication of 0.77 acre (32 percent of 2.4 acres). As mentioned above, Section 17.12.F of the LAMC allows private recreational areas developed within a project site for use by the particular project's residents to be credited against the project's land dedication and/or in lieu fee requirement. As discussed under Project Design Features above, the project proposes to include 82,052 square feet (1.88 acre) of common open space and indoor recreational amenities. Implementation of the mitigation measure below would ensure that through the provision of on-site recreational amenities and open space areas as a credit against the dedication of open space, payment of in-

⁴¹ To present a conservative analysis, each of the units is assumed to have more than three habitable rooms.

lieu fees, dedication of parkland, or a combination of these methods, the project would comply with the maximum requirements established under the Quimby Act. With this mitigation measure, impacts on parks and recreational facilities would be less than significant.

4. CUMULATIVE IMPACTS

Section III of this Draft EIR identifies 40 related projects located within the City of Los Angeles and Beverly Hills that are anticipated to be developed within the vicinity of the project site. For purposes of this cumulative analysis on parks and recreation, only those related projects that propose residential uses are considered as residential uses would generate users of park facilities and services. Of the 40 related projects identified in Section III, the 20 residential projects are included in this cumulative analysis as listed in **Table IV.J.5-3, *Estimated Cumulative Impacts to Parks and Recreational Facilities***. These related projects would cumulatively generate, in conjunction with the proposed project, the need for additional parks and recreational facilities. Similar to the proposed project, the residential population was determined by multiplying the number of residential units by the average household size as indicated by the population data. As shown in Table IV.J.5-3, related projects could potentially generate approximately 3,759 residents. The proposed project in conjunction with related projects could therefore generate approximately 4,138 residents. However, all related projects with residential uses would be required to comply with the requirements of the Quimby Act, the PRP, and LAMC Sections 12.21 and 17.12. As such, potential cumulative impacts to parks and recreational facilities would be reduced to a less than significant level.

5. MITIGATION MEASURES

Mitigation Measure J.5-1: In the event that the project's amenities do not provide sufficient credit against the project's land dedication and/or in lieu fee requirement, the Applicant shall do one or more of the following: (1) dedicate additional parkland to meet the requirements of Los Angeles Municipal Code Section 17.12; (2) pay in-lieu fees for any land dedication requirement shortfall; or (3) provide on-site improvements equivalent in value to said in-lieu fees.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Potential significant impacts to park and recreational facilities associated with the proposed project would be reduced to a level that is less than significant via compliance with Mitigation Measure J.5-1.

Table IV.J.5-3

Estimated Cumulative Impacts to Parks and Recreational Facilities

Map No. ^a	Project	Location	Residential Population ^{b, c, d}
3	Mixed-Use Development	10955 Wilshire Blvd	20
4	Mixed-Use Development	10857 Santa Monica Blvd	95
7	Mixed-Use Development	1130 Gayle Ave	97
8	Mixed-Use Development	1777 Westwood Blvd	91
9	Condominium	10777 Wilshire Blvd	121
12	Condominium	1929 Beloit Ave	127
14	Century City Westfield Expansion	10250 Santa Monica Blvd	351 ^e
15	Mixed-Use Development	11122 Pico Blvd	1087
16	Mixed-Use Development	2025 Avenue of the Stars	279 ^e
17	Condominium	10331 Bellwood Ave	319
20	9900 Wilshire Blvd	9900 Wilshire Boulevard	524
22	The Beverly Hilton	9876 Wilshire Boulevard	250
23	Condominiums	9936 Durant Drive	27
26	Condominiums	450-460 North Palm Drive	73
27	Condominiums	432 N Oakhurst Drive	71
30	Condominiums	140-144 South Oakhurst Drive	23
32	Mixed-Use Development	9200 Wilshire Boulevard	112
35	Condominiums	225 S Hamilton Drive	27
36	Condominiums	156-168 North La Peer Drive	21
38	Mixed-Use Development	8600 Wilshire Boulevard	44
Related Projects Total			3,759
Proposed Project Total			379
Grand Total			4,138

^a Corresponds with Map Nos. on Figure III-1 of this Draft EIR.

^b Based on the most recent (2009) data in the West Los Angeles Community Plan, the Community Plan area has 76,933 persons residing in 38,155 dwelling units, averaging approximately 2.02 persons per household. City of Los Angeles Planning Department Statistical Information, <http://cityplanning.lacity.org>, accessed April 5, 2011.

^c Based on the most recent (2011) California Department of Finance Data, the City of Beverly Hills has a residential population of 34,132 persons residing in 16,393 dwelling units, averaging 2.08 persons per household. California Department of Finance. Table E-5: Population Estimates with Annual Percent Change – January 1 2010 and 2011, <http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php>, accessed April 29, 2011.

^d Totals are rounded to the nearest whole number.

^e Based on the 2010 Census data, Century City (Census Tract 2679.01) has 2,428 residents residing in 1,812 housing units, an averaging 1.34 persons per household. <http://factfinder2.census.gov>, accessed April 29, 2011.

Source: Fehr and Peers (related projects), and PCR Services Corporation (population calculations), July 2011.