IV. Environmental Impact Analysis

L. Public Services

4. Recreation and Parks

a. Introduction

This section addresses the potential impacts of the Proposed Project on the demand for parks and recreational facilities, as well as the ability of existing and future proposed parks and recreational facilities in the vicinity of the Project Site to accommodate any increase in demand resulting from the Proposed Project. Recreation and park facilities that serve the Project Site are provided and maintained by the City of Los Angeles Department of Recreation and Parks (“LADRP”); therefore, the impact analysis will focus on the Proposed Project’s impacts on the neighborhood, community, and regional recreational park facilities that are serviced by the LADRP within the West Los Angeles Community Plan area.

b. Environmental Setting

(1) Regulatory Framework

(a) State of California

The California Government Code, Section 66477 (“Quimby Act”) authorizes cities and counties to enact ordinances which would require the dedication of land or payment of fees for park or recreational purposes for projects involving residential subdivisions. The Quimby Act does not, however, apply to commercial or industrial subdivisions. The Quimby Act provides that the dedication of land, or the payment of fees, or both, shall not exceed the proportionate amount necessary to provide three (3) acres of park area per

50 California Government Code, Section 66477 (Quimby Act).
1,000 persons residing within a subdivision, unless the amount of existing neighborhood and community park area within the local jurisdiction exceeds that limit.

(b) City of Los Angeles

(i) City Charter

The City Charter established the LADRP to construct, maintain, operate, and control all parks, recreational facilities, museums, observatories, municipal auditoriums, sports centers and all lands, waters, facilities or equipment set aside or dedicated for recreational purposes and public enjoyment within the City of Los Angeles. The Board of Recreation and Parks Commissioners (“Board”) oversees the LADRP.

With respect to control and management of recreation and park lands, Section 594(c) of the City Charter provides that all lands set apart or dedicated as a public park shall forever remain for the use of the public inviolate; but the Board may authorize the use of those lands for any park purpose and for other specified purposes.

(ii) Los Angeles General Plan

The City’s General Plan Framework Element (adopted in August 2001) includes park and open space policies which address recreation uses throughout the City. Most relevant to the Proposed Project is Policy 9.23.5, which directs the LADRP to “[r]e-evaluate the current park standards and develop modified standards which recognize urban parks, including multi-level facilities, smaller sites, more intense use of land, public/private partnerships and so on.” Another policy calls for the preparation of a planning document to guide park and recreation standards. Policy 9.23.8 instructs the Department of Recreation and Parks to “[p]repare an update of the General Plan Public Facilities and Services Element based on the new Los Angeles Department of Recreation and Parks standards by 2005.”

The City’s General Plan Open Space Element was formally initiated pursuant to a Council motion adopted on May 21, 2001 (CF 96-1358) and is currently undergoing revisions by the Department of City Planning. However, until approval of the pending Open Space Element, the City Department of Recreation and Parks is operating under the guidance of the Public Recreation Plan, a portion of the Public Facilities and Services Element of the 1980 City of Los Angeles General Plan. The standards of the Public Recreation Plan are described below.
(iii) Public Recreation Plan

The Public Recreation Plan (“PRP”), a component of the City’s General Plan, was adopted in 1980 by the City Council. The PRP focuses on physical facilities by emphasizing the provision of neighborhood and community recreation sites, including community buildings, gymnasiums, swimming pools, and tennis courts. To a large 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 radius and projected population levels.

According to the PRP, a satisfactory park and recreation system should address standards in three respects: (1) sufficient land area reserved for parks and recreation; (2) appropriate distribution of park and recreation facilities throughout the City; and (3) a full complement of park and recreation facility types (e.g., 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.

Based on the standard park characteristics set forth in the PRP, park facilities are discussed in terms of local parks and regional facilities. Local parks include both neighborhood and community recreational parks and open space. A neighborhood park/recreation site is intended to serve its immediate neighborhood. Although the desirable size for a neighborhood park is considered to be five (5) to ten (10) acres, within the City of Los Angeles, they are usually one (1) to five (5) acres in size. A community recreation site is designed to serve residents of all ages in several surrounding neighborhoods. The desirable size for a community park/recreation site is considered to be 15 to 20 acres.

The PRP also states that the location and allocation of acreage for neighborhood and community parks and recreational facilities should be determined on the basis of the service radius within residential areas throughout the City. The service radius for a neighborhood park is approximately 1 mile, while an approximate 2-mile radius is acceptable for a community facility.

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51 City of Los Angeles Public Recreation Plan, a portion of the Public Facilities and Services Element of the City of Los Angeles General Plan. Approved October 9, 1980.

52 Ibid. Approved October 10, 1980.
The desired long-range standard for local parks is based on two (2) acres per 1,000 persons for neighborhood parks and two (2) acres per 1,000 persons for community parks or four (4) acres per 1,000 persons of combined neighborhood and community parks. However, 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 (1) acre per 1,000 persons for neighborhood parks and one (1) acre per 1,000 persons for community parks, or two (2) acres per 1,000 people of combined neighborhood and community parks. It is important to note that these standards are Citywide goals and are not intended to be requirements for individual development projects.

Finally, the PRP states that no park or recreational facility should be diminished in size or removed from any service radius unless the required acreage is replaced elsewhere within that same service radius, or unless the need is diminished due to population and/or land use changes.

(iv) Citywide Community Needs Assessment

In 2009, the LADRP completed a Citywide Community Needs Assessment ("Assessment"). The Assessment examined current and future recreational needs in the City as a first step in developing a Citywide park master plan and a five year capital improvement plan. The overall objectives of the Assessment were to address the need for additional recreation facilities and park land, identify improvements to facilities to meet current and future demands, prevent future maintenance issues, and offer positive alternatives to an increasingly dense and urbanized population. The Assessment provides a number of key recommendations to be implemented through a detailed master planning process. These recommendations include, but are not limited to, working with the City’s Planning Department to modify the Park and Recreation Site Acquisition and Development Provisions set forth in Section 17.12 of the Los Angeles Municipal Code ("LAMC") and update the PRP, developing an updated pricing and revenue plan to offset capital and operational costs, and implementing a land acquisition strategy involving developer impact agreements based on the standards for open space desired.

Based on the Assessment, the expectation as to how far people are willing to travel to parks and recreational facilities has also changed drastically since the time that the PRP

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54 Ibid.
was adopted in 1980. Specifically, sixty-three (63) percent of survey respondents stated that they would travel at least one mile to visit a neighborhood park and thirty-eight (38) percent of respondents would travel at least two miles. Additionally, seventy-one (71) percent of respondents would travel at least two miles to visit a community park and thirty-seven (37) percent of respondents would travel more than three miles to visit a community park. The willingness to travel farther to a park or recreational facility is in part due to the increased accessibility of public transit, as it is now easy and convenient for people to access parks farther than a half mile from their place of residence.

The Assessment also made the following findings:

- The City lacks the appropriate levels of neighborhood and community parks that are close to home and parks are not equitably distributed across the City.

- The amount of park land available in the City is low for the level of density in the City and people would like more land for mini-parks, neighborhood parks, community parks and downtown parks. Specifically, more parks are needed in redevelopment areas.

- There is a concern that some parks are unsafe and controlled by gangs and lack sufficient security, keeping people from using the park in a productive manner.

- Parks are in need of infrastructure improvements to restrooms, parking areas, playgrounds, picnic facilities, sports courts, security lighting, irrigation systems, and sports fields. It is recognized that poor general site conditions encourage vandalism and keep the community from using the parks in a positive manner.

- Sports fields are a needed amenity.

- Sustainable landscapes in parks are an important design element that the LA DRP should incorporate into its design standards.

- Some existing parks are outdated in design. The LA DRP needs to develop new design standards for parks in the future and customize the parks to the people living in the area that will be using the park.

- Walkability of the City and the ability to walk to City parks are important.

- The LA DRP must create a balance of park types and managed by park and amenity standards that promote equal access.

- Many citizens indicate that parks were overused on weekends.

- Improvements to the Los Angeles River were brought forward as opportunity sites that could be developed and improved for parks and recreation purposes.
(v)  *West Los Angeles Community Plan*

The West Los Angeles Community Plan was adopted in 1999 as one of 35 community plans that comprise the City’s General Plan Land Use Element. The Community Plan area encompasses approximately 7.06 square miles and contains a diverse mix of land uses comprised of single- and multi-family residential, commercial/retail, and industrial land uses.

All development within the West Los Angeles Community Plan area is subject to the planning guidelines of the adopted West Los Angeles Community Plan. The West Los Angeles Community Plan includes a parks and recreation goal to provide “adequate recreation and park facilities which meet the needs of the residents in the community.” The West Los Angeles Community Plan also includes an open space goal to provide “sufficient open space in balance with new development to serve the recreational, environmental, health, and safety needs of the community and to protect environmental and aesthetic resources.” To this end, the West Los Angeles Community Plan includes the following specific policies:

- Preserve and improve the existing recreational facilities and park space;
- Encourage the use of other public facilities for recreational purposes;
- To provide facilities for specialized recreational needs by utilizing existing public lands such as flood control channels, utility easements, Department of Water and Power property, or underutilized railroad rights-of-way;
- Unused or underutilized public lands should be considered for open space and recreational purposes;
- Ensure that parks are adequately illuminated for safe use at night, as appropriate;
- Develop new neighborhood and community parks to help offset the community’s parkland deficit for its current 1990 population and its projected year 2010 population;

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• Private mini-parks or usable open space be provided in the transition area between industrial and residential uses, and between multifamily and single family uses;

• Encourage the retention of passive and visual open space which provides a balance to the urban development of the community;

• The City should encourage continuous efforts by Federal, State and County agencies to acquire vacant land for open space;

• Conversion and upgrading of underutilized publicly-owned property; and

• Unused or underutilized public lands should be considered for open space and recreational purposes.

For further discussion regarding the applicable goals and policies of the Community Plan, see Section IV.I, Land Use Planning, of this Draft EIR.

(vi) Los Angeles Municipal Code

(A) Quimby Act

As authorized under the Quimby Act discussed above, the City of Los Angeles has established an ordinance, codified in LAMC Section 17.12 (Park and Recreation Site Acquisition and Development Provisions), which requires developers of residential subdivisions to set aside and dedicate land for park and recreational uses and/or pay fees for park or recreational purposes for projects involving residential subdivisions. LAMC Section 17.12 also provides standards for land acreage requirements by project density and identifies fees per unit by zoning designation. Quimby fees are used to acquire necessary land and/or develop new neighborhood and community parks or recreation facilities, which would reasonably serve each residential project. Pursuant to LAMC Section 17.12.B, the percentage of gross subdivision area required to be dedicated for park and recreation purposes ranges from 0.9 percent (for subdivisions with a net density of one dwelling unit per acre or less) to 32.0 percent (for subdivisions with a net density of 100 dwelling units per acre or more).

Under the Quimby Act, a local jurisdiction cannot require more than three (3) acres of parkland per 1,000 residents, unless that jurisdiction already has a park-to-population rate higher than three (3) acres of parkland per 1,000 residents. As the City of Los Angeles provides less than three (3) acres of parkland per 1,000 residents, the maximum exaction per the Quimby Act cannot exceed a maximum of three (3) acres of park area per 1,000 Project residents. Quimby fees are used to acquire necessary land and/or develop new
neighborhood and community parks or recreation facilities, which would reasonably serve each residential project.

In subdivisions containing more than 50 dwelling units, the City allows developers to dedicate parkland in lieu of paying fees. Further, Section 17.12 of the LAMC allows recreation areas developed on a project site that is for use by the project’s residents to be credited against the project’s land dedication 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) and children’s play areas with playground equipment comparable in type and quality to those found in City parks. Furthermore, 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 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 park and recreation facilities. In addition, Section 17.12 provides that low intensity development recreation areas (hereafter referred to as “common open space”) may be credited against the project’s land dedication requirement if approved by the City’s Advisory Agency.

(B) Required Open Space

LAMC Section 12.21.G (City Ordinance 171,753) provides minimum standards for the amount of “open space” that residential development projects are required to provide on-site. Open space includes both common and private greenspace and recreational amenities that meet specific standards. However, it should be noted that not all areas designated as open space per the provisions of the LAMC would be classified as park or recreational facilities under the LAMC Section 17.12, (discussed above), Dwelling Unit Construction Tax programs, General Plan Framework Element, or by the LADRP.

Pursuant to LAMC Section 12.21.G, new construction in the City of six or more dwelling units on a lot is required to provide at a minimum 100 square feet of usable open space for each dwelling unit having less than three habitable rooms; 125 square feet for each dwelling unit having three habitable rooms; and 175 square feet for each dwelling unit having more than three habitable rooms. Usable open space is defined as areas which are designed and intended to be used for active or passive recreation. Usable open space may consist of private and/or common area open space; however, common open space areas must be a minimum of 400 square feet, readily accessible to all residents of the site, and must constitute at least 50 percent of the total open space provided. Common open space areas can incorporate recreational amenities such as swimming pools, spas, children’s play areas, and sitting areas. Open space does not generally include parking areas, driveways, or required front and side yards. A minimum of 25 percent of the common open space area must be planted with ground cover, shrubs or trees and at least one 24-inch box tree is required for every four dwelling units.
(C) Dwelling Unit Construction Tax

Pursuant to LAMC Section 21.10.3(a)(1) (Dwelling Unit Construction Tax), the City imposes a tax of $200 per dwelling unit on the construction of all new dwelling units and modification of existing dwelling units to be paid to the Department of Building and Safety. These taxes are placed into a “Park and Recreational Sites and Facilities Fund” to be used exclusively for the acquisition and development of park and recreational sites. If a developer has already paid Quimby fees, as described under Section 17.12, or has dedicated in lieu parkland or recreational facilities, the dwelling unit tax required is reduced accordingly.

(2) Existing Park and Recreation Facilities

(a) City of Los Angeles

Parks and recreational facilities operated within the City of Los Angeles are administered by the LADRP and are divided into four organizational regions: (1) Metropolitan, which incorporates central and east Los Angeles; (2) Pacific Region, which includes west and south Los Angeles; (3) Griffith Region, which incorporates all facilities in Griffith Park; and the (4) Valley Region, which incorporates all facilities within the portion of the San Fernando Valley located within the City of Los Angeles. The LADRP maintains over 15,600 acres of parkland, comprised of over 400 neighborhood parks, eleven lakes, and more than 180 recreation and community centers. The LADRP also operates 59 swimming pools, 7 camps, more than a dozen museums and historic sites, 13 golf courses, 29 senior centers, 2 beaches, and an urban forest of one million trees. The Project Site is located within the LADRP Pacific Region.

As mentioned above, the City generally considers a park’s service radius for a neighborhood park to be approximately 1 mile, while an approximate 2-mile radius is acceptable for a community facility. This radius information was confirmed by the more recent LADRP Assessment. Park facilities within the West Los Angeles Community Plan area, as well as those outside of the Community Plan area but within a 2-mile radius of the Project Site, have been identified for evaluation purposes.


(i) Facilities Within the West Los Angeles Community Plan Area

The LADRP utilizes the Community Plan area as the geographic area to statistically evaluate the park needs of the Community Plan area’s residents. According to the West Los Angeles Community Plan, there are approximately 55 acres of park and recreation area, and 288 acres of public and private golf courses in the West Los Angeles Community Plan area. The West Los Angeles Community Plan area contains all three park types (i.e., neighborhood, community, and regional) as defined in the PRP. Specifically, there are four neighborhood parks (Irving Schachter Park, Club Circle, Ohio and Bundy Triangle, and Palms Park), three community parks (Cheviot Hills Park and Recreation Center, Felicia Manhood Senior Citizen Center, and Stoner Recreation Center), and one regional park (Rancho Park and Golf Course) located in the West Los Angeles Community Plan Area. Table IV.L-11 on page IV.L-81 details the parks and recreation areas located in the West Los Angeles Community Plan area. Figure IV.L-4 on page IV.L-82 depicts the parks facilities located within a two-mile radius of the Project Site.

As discussed in Section IV.K, Population and Housing, of this Draft EIR, 2010 population data is provided for the Community Plan Area based on City Planning Department data and forecasts included in the City’s General Plan Framework Element. In 2010, it is forecasted that there were 78,098 persons in the Community Plan Area based on the City Planning Department data, whereas the General Plan Framework Element forecasted a 2010 Community Plan Area population of 86,228 persons. Based on the population forecast using the City Planning Department’s data, to meet the PRP’s long-term goals of 4 acres per 1,000 persons of combined neighborhood and community parks, the West Los Angeles Community Plan area would require approximately 312.4 acres \(\left(\frac{78,098}{1000}\right) \times 4\) of combined neighborhood and community parks. Therefore, the West Los Angeles Community Plan Area is experiencing a park deficiency and currently provides approximately 17.5 percent of the 312.4 acres of parkland required using the PRP’s long-term standards. Thus, the 0.71 acres of neighborhood and community park acreage per 1,000 persons \(\left(\frac{55.09}{78,098 \div 1,000}\right)\) is available within the West Los Angeles Community Plan Area. Since the desired long-range standard for local parks is two (2) acres per 1,000 persons for neighborhood parks and two (2) acres per 1,000 persons for community parks or four (4) acres per 1,000 persons of combined neighborhood and community parks, this results in a deficiency of 3.29 acres of neighborhood and community parks per 1,000 persons to meet the long-term standards.


59 Ibid.
### Table IV.L-11
LADRP Facilities Within the West Los Angeles Community Plan Area

<table>
<thead>
<tr>
<th>Map Number</th>
<th>Facility</th>
<th>Park Classification</th>
<th>Distance from Project Site</th>
<th>Features</th>
<th>Size (acres)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Irving Schachter Park</td>
<td>Neighborhood</td>
<td>1.5 miles southeast of the Project Site</td>
<td>Unstaffed Park open dawn to dusk.</td>
<td>0.75</td>
</tr>
<tr>
<td>2</td>
<td>Cheviot Hills Park and Recreation Center</td>
<td>Community</td>
<td>0.9 mile southeast of the Project Site</td>
<td>Community Room; Auditorium with Stage; Kitchen; Barbeque Pits; Baseball Diamond; Basketball Courts (Lighted Indoor and Outdoor); Sports Field (Lighted and Unlighted); Petanque Courts; Tennis Courts; Children’s Play Area; Indoor Gym; Picnic Area with Tables; Volleyball Courts; Archery Range; Amphitheater.</td>
<td>40.0</td>
</tr>
<tr>
<td>3</td>
<td>Palms Park and Recreation Center</td>
<td>Neighborhood</td>
<td>1.6 miles south of the Project Site</td>
<td>Grass Area; Basketball Courts (Lighted Outdoor); Picnic Area with Picnic Tables; Auditorium; Barbeque Pits; Children’s Play Area; Child Care Center; Community Room; Kitchen.</td>
<td>4.5</td>
</tr>
<tr>
<td>4</td>
<td>Rancho Park Golf Course</td>
<td>Regional</td>
<td>0.7 mile south of the Project Site</td>
<td>18-hole Municipal Golf Course.</td>
<td>145.0</td>
</tr>
<tr>
<td>5</td>
<td>Felicia Mahood Multi-Purpose Center</td>
<td>Community</td>
<td>2.0 miles west of the Project Site</td>
<td>Auditorium; Community Room; Baseball Diamond (Lighted); Basketball Courts (Lighted Indoor and Outdoor); Children’s Play Area; Indoor Gym; Picnic Tables; Seasonal Pool (Outdoor, Unheated); Soccer Field (Lighted); Tennis Courts (Lighted); Volleyball Courts (Unlighted); Kitchen; Stage; TV Area</td>
<td>0.75</td>
</tr>
<tr>
<td>6</td>
<td>Stoner Recreation Area</td>
<td>Community</td>
<td>2.5 miles southwest of the Project Site</td>
<td>Barbecue pits; baseball diamond (Lighted/Unlighted); basketball courts (Lighted/Outdoor); Children’s Play Area; Football field (lighted); Indoor Gym (Without weights); picnic tables; Soccer field (lighted); Tennis courts (unlighted); Volleyball courts (lighted).</td>
<td>8.8</td>
</tr>
<tr>
<td>7</td>
<td>Club Circle</td>
<td>Neighborhood</td>
<td>1.4 miles southeast of the Project Site</td>
<td>Landscaping; grassy area</td>
<td>0.25</td>
</tr>
<tr>
<td>8</td>
<td>Ohio and Bundy Triangle</td>
<td>Pocket</td>
<td>2.9 miles southwest of the Project Site</td>
<td>Benches; pathway; landscaping</td>
<td>0.04</td>
</tr>
</tbody>
</table>

**Total Acreage**

55.09

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*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.*
Legend

1. Irving Schachter Park
2. Cheviot Hills Park and Recreation Center
3. Robertson Recreation Center
4. Palms Park and Recreation Center
5. Rancho Park Golf Course
6. Westwood Park and Recreation Center
7. Felicia Mahood Multi-Purpose Center
8. Holmby Park
9. Will Rogers Memorial Park
10. Beverly Gardens Park
11. Oakhurst Mini Park

established in the PRP. If the higher General Plan Framework forecasts are used, a greater amount of parkland would be required and a greater park deficiency would occur (i.e., 323.48 acres would be required, the park ratio would be 0.68 acres per 1,000 residents, and the park deficiency would be 3.32 acres per 1,000 residents).

The PRP 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 (1) acre per 1,000 persons for neighborhood parks and one (1) acre per 1,000 persons for community parks, or two (2) acres per 1,000 people of combined neighborhood and community parks. With the application of the short- and intermediate-range standards, a deficiency of 1.29 acres of neighborhood and community parks results under the City Planning Department data based population forecast. This deficiency grows to 1.32 acres of neighborhood and community parks under the General Plan Framework population forecast.

(b) Additional Parks located Within 2 Miles of the Project Site.

Although the LADRP recognizes the Community Plan area as the geographic area for statistically determining park needs in the Project vicinity, the PRP also recognizes that the service radius for a neighborhood park is approximately one mile, and that the service radius of a community park is approximately two miles. These service radii are consistent with the guidance set forth in the *L.A. CEQA Thresholds Guide* (discussed below) and the findings of the Assessment. Consistent with these criteria, there are additional parks within two miles of the Project Site that are located outside the jurisdictional boundaries of the West Los Angeles Community Plan area that would also serve the Project Site and relieve the demand on parks within the West Los Angeles Community Plan Area. Table IV.L-12 on page IV.L-84 details the parks and recreational facilities located outside the West Los Angeles Community Plan area, but within the two-mile service radius of the Project Site.

(c) City of Beverly Hills

In addition to the facilities operated by the LADRP, there is one (1) recreation center and three (3) parks operated by City of Beverly Hills located within two (2) miles of the Project Site. The three parks that are operated by the City of Beverly Hills are detailed in Table IV.L-13 on page IV.L-84. Although these parks may be utilized by residents and visitors of the Proposed Project, to provide a conservative analysis, it is assumed that all residents and visitors of the Proposed Project would utilize LADRP facilities within the West Los Angeles Community Plan area. The Roxbury Recreation Center—which is located 0.5 mile east of the Project Site, includes picnic tables, basketball courts, a lawn bowling area, tennis courts, sand volleyball courts, and a children’s playground, but is available only to residents of the City of Beverly Hills. Thus, the Roxbury Recreation Center would not be available to residents of the Proposed Project.
### Table IV.L-12
LADRPA Facilities Serving the Project Site Located Outside of the West Los Angeles Community Plan Area

<table>
<thead>
<tr>
<th>Map Number</th>
<th>Facility</th>
<th>Park Classification</th>
<th>Distance from Project Site</th>
<th>Features</th>
<th>Size (acres)</th>
</tr>
</thead>
<tbody>
<tr>
<td>9</td>
<td>Robertson Recreation Center</td>
<td>Community</td>
<td>1.8 miles southeast of the Project Site.</td>
<td>Basketball Courts (Lighted Outdoor); Children’s Play Area; Community Rooms; Handball Courts (Lighted); Indoor Gym; Picnic Tables; Child Care Center; Kitchen</td>
<td>1.2</td>
</tr>
<tr>
<td>10</td>
<td>Westwood Park and Recreation Center</td>
<td>Community</td>
<td>1.7 miles west of the Project Site.</td>
<td>Barbeque Pits; Baseball Diamonds (Lighted); Basketball Courts (Lighted Indoor and Outdoor); Children’s Play Area; Community Room; Indoor Gym; Picnic Tables.</td>
<td>26.7</td>
</tr>
<tr>
<td>11</td>
<td>Holmby Park</td>
<td>Neighborhood</td>
<td>1.3 miles northwest of the Project Site.</td>
<td>Barbeque Pits; Children’s Play Area; Picnic Tables; Jogging Path; Bowling Greens; Waterfall</td>
<td>8.5</td>
</tr>
<tr>
<td><strong>Total Acreage</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>36.4</strong></td>
</tr>
</tbody>
</table>

### Table IV.L-13
City of Beverly Hills Parks Within Two Miles of the Project Site

<table>
<thead>
<tr>
<th>Map Number</th>
<th>Facility</th>
<th>Park Classification</th>
<th>Distance from Project Site</th>
<th>Features</th>
<th>Size</th>
</tr>
</thead>
<tbody>
<tr>
<td>12</td>
<td>Will Rogers Memorial Park</td>
<td>Neighborhood</td>
<td>1.6 miles northeast of the Project Site.</td>
<td>Landscaped Garden Areas; Walking/Jogging Paths; Monument Park Signs; Restroom Facilities.</td>
<td>3.5 acres</td>
</tr>
<tr>
<td>13</td>
<td>Beverly Gardens Park</td>
<td>Neighborhood</td>
<td>0.7 miles northeast of the Project Site.</td>
<td>Walking/Jogging Paths; Cactus Garden; Rose Garden; Fountains; Arbors; Historic City of Beverly Hills Sign.</td>
<td>1.9 miles</td>
</tr>
<tr>
<td>14</td>
<td>Oakhurst Mini Park</td>
<td>Mini</td>
<td>1.6 miles east of the Project Site.</td>
<td>Landscaped Area; Benches.</td>
<td>0.1 acre</td>
</tr>
<tr>
<td><strong>Total Acreage</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>5.5</strong></td>
</tr>
</tbody>
</table>

For the various reasons cited above, the City of Beverly Hills recreational facilities have not been included in the below analysis and are included for informational purposes to provide a complete description of all park facilities within two (2) miles of the Project Site.
(d) Private Recreation Areas

In addition to the public park and recreation services provided by the LADRP and the City of Beverly Hills, there are a two private country clubs within two (2) miles of the Project Site, which would potentially be available to the residents, employees and visitor population of the Proposed Project. However, as these facilities are either private membership facilities or require the payment of fees to use, they do not meet the definition of open space as set forth in the PRP. Thus, these two private golf courses have not been included in the below analysis and are included for informational purposes to provide a complete description of all recreation facilities within two (2) miles of the Project Site.

c. Environmental Impacts

(1) Methodology

The Proposed Project’s impacts on parks and recreation facilities and services were analyzed by: (1) reviewing the existing parks and recreation facilities in the West Los Angeles Community Plan area; (2) projecting the future 2015 resident population increase associated with the Proposed Project; and (3) evaluating the demand for parks and recreation service anticipated at the time of Project buildout compared to the expected level of service available within the West Los Angeles Community Plan area, considering both LADRP recreation facilities as well as the Proposed Project’s open space and recreation facilities. The analysis also considers whether the Proposed Project would conflict with the parks and recreation standards set forth the applicable in regulatory documents (i.e., Quimby Act and LAMC). As previously noted, the PRP parkland standards are Citywide goals and are not requirements for individual development projects.

(2) Thresholds of Significance

(a) City of Los Angeles CEQA Thresholds Guide

The LA CEQA Thresholds Guide (2006) states that the determination of the significance of impacts related to recreation and parks 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 buildout 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 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 LADRP).

Based on these factors, the Proposed Project would have a significant impact on parks and recreation, if:

- The Proposed Project would generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and service; or

- Project construction would interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project area.

(3) Project Design Features

(a) Option A

Option A would provide a total of 3.82 acres of common and private open space through the implementation of the following project design features (“PDFs”), which are considered in the analysis of potential impacts of Option A:

- Option A would provide approximately 3.32 acres of common open space. This common open space would consist of, at ground level, a publicly accessible plaza that would be approximately 2.04 acres in size and accessed from Avenue of the Stars and Constellation Boulevard. The plaza would be pedestrian friendly, and would be enhanced with extensive landscaping, multiple water features, including a green living wall/waterwall, and high quality hardscape materials. Option A’s common open space areas that are available to the residents and hotel guests also include approximately 0.99 acres of landscaped roof terraces and approximately 0.29 acre of indoor recreation area (i.e., fitness center). Through the introduction of these features, Option A’s common open space would be designed to create an inviting, aesthetically pleasing environment on the Project Site and convert what is currently a single-function private use to an attractive and publicly accessible community gathering space available to occupants of the commercial space, guests of the hotel space, residents and other visitors alike. A summary of the common open space provided under Option A is provided in Table IV.L-14 on page IV.L-88.

- In addition to the common open space resources described above, Option A would also provide approximately 0.50 acre of private open space. This private open space would consist of balconies available to the residents of the Project’s
individual dwelling units as well as roof terraces and gardens. A summary of the private open space provided under Option A is also provided in Table IV.L-14.

(b) Option B

Option B would provide a total of approximately 3.70 acres of common and private open space under the Option B With Office Scenario and a total of approximately 3.86 acres of common and private open space under the Option B Without Office Scenario through the implementation of the following PDFs, which are considered in the analysis of potential Project impacts of Option B:

- The Option B With Office Scenario would provide approximately 3.32 acres of common open space, while the Option B Without Office Scenario would provide approximately 3.38 acres of common open space. Under both Option B Scenarios, this common open space would consist of, at ground level, a publicly accessible plaza that would be approximately 1.93 acres in size. The plaza would be accessible from Avenue of the Stars through an open lobby that would extend through the center of the Rehabilitated Building. The plaza would include extensive landscaping, multiple water features, and sitting and relaxation space. As compared to Option A, the plaza would be located further west on the Project Site, and would be less prominent from the Avenue of the Stars frontage due to the retention of the Rehabilitated Building. The common open space would also include landscaped roof terraces and indoor recreation areas. With respect to landscaped roof terraces, both Option B Scenarios would provide approximately 1.13 acres of landscaped roof terrace areas which are available to residents and hotel guests. With respect to indoor recreation areas, the Option With Office Scenario would provide approximately 0.26 acre of indoor recreation area (i.e., fitness center), while the Option B Without Office Scenario would provide 0.32 acre of indoor recreation area. Through the introduction of these features, Option B’s common open space would be designed to create an inviting, aesthetically pleasing environment on the Project Site and convert what is currently a single-function private use to an attractive and publicly accessible community gathering space available to occupants of the commercial space, guests of the hotel space, residents, and other visitors. A summary of the common open space provided under both Option B Scenarios is provided in Table IV.L-14 on page IV.L-88.

- In addition to the common open space resources described above, Option B would also provide private open space in the form of balconies available to the residents of the Project’s individual dwelling units and roof terraces. The Option B With Office Scenario would provide approximately 0.38 acres of private open space, while the Option B Without Office Scenario would provide approximately 0.48 acre of private open space. A summary of the private open space provided under both Option B Scenarios is also provided in Table IV.L-14.
Table IV.L-14
Proposed Open Space

<table>
<thead>
<tr>
<th>Open Space Proposed</th>
<th>Option A</th>
<th>Option B With Office</th>
<th>Option B Without Office</th>
</tr>
</thead>
<tbody>
<tr>
<td>Common Open Space</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Plaza / Courtyard</td>
<td>2.04</td>
<td>1.93</td>
<td>1.93</td>
</tr>
<tr>
<td>Roof Terraces</td>
<td>0.99</td>
<td>1.13</td>
<td>1.13</td>
</tr>
<tr>
<td>Indoor Recreation Area</td>
<td>0.29</td>
<td>0.26 (^a)</td>
<td>0.32 (^a)</td>
</tr>
<tr>
<td>Subtotal</td>
<td>3.32</td>
<td>3.32</td>
<td>3.38</td>
</tr>
<tr>
<td>Private Open Space</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Roof Terrace / Garden</td>
<td>0.17</td>
<td>0.08</td>
<td>0.08</td>
</tr>
<tr>
<td>Balcony Space</td>
<td>0.33</td>
<td>0.30</td>
<td>0.40</td>
</tr>
<tr>
<td>Subtotal</td>
<td>0.50</td>
<td>0.38</td>
<td>0.48</td>
</tr>
<tr>
<td>Total Open Space</td>
<td>3.82</td>
<td>3.70</td>
<td>3.86</td>
</tr>
</tbody>
</table>

\(^a\) LAMC Section 12.21.G requires that new construction of six or more dwelling units on a lot provide a minimum quantity of open space area per dwelling unit, based on the number of bedrooms in each dwelling unit. As a result, the Option B Without Office Scenario, which includes a greater number of dwelling units, has a larger open space requirement than the Option With Office Scenario. Further, LAMC Section 12.21.G requires that no more than 25 percent of the indoor recreation room qualify for the total required usable open space. This accounts for the variation in the size of the indoor recreation area.

Source: Matrix Environmental, 2010

(4) Project Impacts

As discussed in Section III, Project Description, of this Draft EIR, development of Option A would involve the demolition of all existing uses and the construction of a mixed-use development that would include two, 49-story buildings positioned on the north and south sides of a two-acre publicly accessible plaza that would be surrounded by ground-level retail and restaurant uses. The proposed mixed-use development would consist of residential, hotel and office uses, as well as retail and restaurant uses. Option A would remove the Existing Hotel and associated buildings, as well as all landscaping now located on the Project Site. Under Option A, the south building would be exclusively dedicated for residential use, consisting of 130 condominium units. The north building would include 240 hotel rooms, 163 condominium units, and 114,000 square feet of office space. Additionally, Option A would also include a ground-level plaza that would be pedestrian friendly, and would be enhanced with extensive landscaping, multiple water features, including a green living wall/waterwall, and high quality hardscape materials. Option A would also include common and private open space areas and a fitness center.
Option B would rehabilitate and reuse the Rehabilitated Building as a mixed-use building containing hotel, residential, retail, and restaurant uses. The first two floors of the 16-story structure would include retail, restaurant, and separate hotel and residential lobby areas. Sixty-three residential condominiums would be distributed throughout the top five floors of the Rehabilitated Building. The remaining nine floors would provide 394 hotel rooms. The Rehabilitated Building would also include approximately 26,250 square feet of meeting/ballroom space, 1,900 square feet of hotel retail space, a 14,000-square foot spa and fitness center, and 9,100 square feet of hotel restaurant space. Under Option B, additional development would be provided behind the Rehabilitated Building. This would consist of a combination of retail and residential buildings. The north building and south building would be positioned behind (west and south of) the Rehabilitated Building. The north building would include 46 stories containing either a mix of residential and office uses or residential uses only [refer to Section II (Project Description) of this Draft EIR]. The south building would include 46 stories containing only residential uses. As with Option A, Option B would include a public plaza that would be enhanced with extensive greenery, multiple water features, and high-quality hardscape materials. As compared to Option A, the plaza would be located further west on the Project Site, and would be less prominent from the Avenue of the Stars frontage due to the presence of the Rehabilitated Building. Option B would also include common and private recreation areas and a fitness center.

(a) Construction Impacts

Proposed Project construction under Option A or Option B would result in a temporary increase in the number of workers to the Project area, thus, there is the potential for workers to utilize park facilities. Generally, this increase is anticipated to be negligible, as construction workers are highly transient in their work location and would likely utilize park facilities near their place of residence and because lunch break times are typically not long enough (30 to 60 minutes) for employees to take advantage of park facilities services and return to work within the allotted time. Thus, although there is a potential for construction workers to utilize nearby parks, any resulting increase in the use of the park would be negligible, temporary, and would occur during off-peak park usage hours.

Cheviot Hills Park is located approximately 0.3 miles southeast of the Project Site. No aspect associated with the construction of the Proposed Project would occur within or adjacent to Cheviot Hills Park and vehicular access to the park would be maintained at all times. The same is true with regard to all other parks located in the Proposed Project area. Therefore, Proposed Project construction, under both Option A and Option B, would not interfere with existing park usage in a manner that would reduce the ability to access and use the facility. As such, construction-related impacts associated with park facilities would be less than significant.
(b) Impacts on Existing Parks and Recreation Facilities

Option A and Option B would both include common open space areas, including a landscaped public plaza area, fitness center, private pools, balconies and other common space areas to help meet the park and recreational needs of the Proposed Project's residents. Through the introduction of extensive landscaping, numerous water features, and outdoor seating areas and gathering spaces, both Option A and Option B would create a more inviting, aesthetically pleasing environment on the Project Site, converting what is currently a single-function private use to an attractive and publicly accessible community gathering space.

Development of the Proposed Project would increase the number of residents in the West Los Angeles Community Plan area. Specifically, as analyzed in Section IV.K (Population and Housing) the development of 293 residential units and 15 housekeeping units under Option A would generate a direct residential population of approximately 677 new residents at Proposed Project build-out in 2015.

The Option B With Office Scenario includes the development 261 residential units and 10 housekeeping units which would generate a total of 600 residents at Proposed Project build-out in 2015. The Option B Without Office Scenario includes the development of 353 residential units and 10 housekeeping units which would generate 808 additional residents to the West Los Angeles Community Plan area upon project build-out in 2015. With regard to Option B’s park and recreation requirements, the Option B Without Office Scenario would generate a greater increase in residents than the Option B With Office Scenario. Thus, to provide a conservative analysis, the Option B Without Office Scenario is used to assess Option B’s potential impacts with regard to park and recreation facilities.

The majority of the park usage attributable to Option A and Option B would be by individuals who permanently reside at the Project Site, and the non-residential uses attributable to Option A and Option B would result in negligible, if any, increased demand at City recreation facilities. If impacts to these facilities occur, increased usage would principally occur by employees seeking to eat their lunch off-site at local parks located in proximity to the Project Site, principally Cheviot Hills Park, which is located 0.3 mile south of the Project Site, and that this type of park usage would principally occur during non-peak park usage periods (i.e., weekdays during the mid-day time period). Although the potential for Project employee use of off-site parks is possible, actual use of such facilities would be limited by the amount of time it would take for on-site employees to access off-site local parks in light of the amount of time a typical employee has available for lunch. Further, employees would likely utilize parks facilities near their place of residence, rather than utilize parks facilities within the Project vicinity on their commute to and from the Project.
Site. Therefore, while some employee usage is anticipated to occur, impacts, if any, would be less than significant.

While it is probable that some of the new residents under both Option A and Option B would already be residing within the West Los Angeles Community Plan area, for purposes of providing a conservative analysis, it is assumed that the new residents of Option A and Option B would be new to the Community Plan area.

In summary, the Proposed Project would provide approximately 3.32 acres of common open space and recreation facilities under Option A and under the Option B With Office Scenario, and approximately 3.38 acres of common open space and recreational facilities under Option B Without Office Scenario. Through the introduction of extensive landscaping, multiple water features, and outdoor seating areas and gathering spaces in these common open space areas, both Option A and Option B would create an inviting, aesthetically pleasing environment on the Project Site, converting what is currently a single-function private use to an attractive and publicly accessible community gathering space. The incorporation of high-quality natural elements such as landscaping and water features within a densely developed Regional Center would provide a unique and valuable respite from the surrounding urban environment. This, coupled with artistic details such as public art and sculpture, would support the quality of life needs of both residents and visitors by creating a greater sense of place and encouraging community interaction. The provision of these well-designed open space areas would likely also serve to reduce the potential increase in demand on area LADRP parks and recreation facilities by on-site residents, employees, and visitors. Nonetheless, the residents generated by Option A and Option B development could create additional demand for parks within the West Los Angeles Community Plan area. The impacts to the PRP’s long-range and short- and intermediate-range standards are discussed in detail below.

(c) Consistency with Plans and Regulations

(i) Public Recreation Plan

As indicated above, the PRP establishes a desired long-range Citywide standard for local parks of two acres per 1,000 persons within a half-mile radius for neighborhood parks and two acres per 1,000 persons within a two-mile radius for community parks. 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 per 1,000 persons within a one-mile radius for neighborhood parks and one acre per 1,000 persons within a two-mile radius for community parks. As previously noted, the PRP parkland standards are Citywide goals and are not requirements for individual development projects.
As shown in Table IV.L-15 on page IV.L-93, the 677 additional residents generated under Option A would require 1.35 acres of neighborhood parkland to meet the PRP’s long-range standard of two acres per 1,000 residents, whereas approximately 0.68 acres would need to be provided to meet the PRP’s more attainable short- and intermediate-range standard of one acre per 1,000 residents. In addition, relative to the PRP standards for community parks, 1.35 acres of community parkland would need to be provided to meet the PRP’s long-range standard of two acres per 1,000 residents, whereas approximately 0.68 acres would need to be provided to meet the PRP’s more attainable short- and intermediate-range standard of one acre per 1,000 residents. Thus, for Option A to meet the PRP’s long-range standard, a total of 2.71 acres of neighborhood and community parkland would be required, whereas a total of 1.35 acres would be required to meet the PRP’s short- and intermediate-range standards.

With regard to Option B’s park and recreation requirements, the Option B Without Office Scenario would generate a greater increase in residents than the Option B With Office Scenario. As such, to provide a conservative analysis, the Option B Without Office Scenario was used to determine Option B’s park and recreation requirements. The 808 additional residents generated under the Option B Without Office Scenario would require an additional 1.62 acres of neighborhood parkland to meet the PRP’s long-range standard of two acres per 1,000 residents, whereas approximately 0.81 acres would be required to meet the PRP’s more attainable short- and intermediate-range standard of one acre per 1,000 residents. In addition, relative to the PRP standards for community parks, 1.62 acres of community parkland would need to be provided to meet the PRP’s long-range standard of two acres per 1,000 residents, whereas approximately 0.81 acres would need to be provided to meet the PRP’s more attainable short- and intermediate-range standard of one acre per 1,000 residents. Thus, for the Option B Without Office Scenario to meet the PRP’s long-range standard, a total of 3.23 acres of neighborhood and community parkland would be required, whereas a total of 1.62 acres would be required to meet the PRP’s short- and intermediate-range standards.

As described above, the Draft EIR’s population analysis includes two different forecasts. For the West Los Angeles Community Plan area, the projected 2015 population, based on City Planning Department data, is 80,870 persons (based on an extrapolation of the Community Plan’s 2010 forecast) and there are currently 55.09 acres of parks. Therefore, the 2015 parks-to-person ratio would be 0.68 acres per 1,000 residents (55.09 / (80,870 / 1,000)). This ratio decreases to 0.63 acres per 1,000 residents using the General Plan Framework 2015 population projection. In order to provide a conservative analysis, the additional residents under Option A and Option B were considered to be new residents above the Community Plan area’s population projections.
Table IV.L-15
Public Resources Plan Open Space Goals

<table>
<thead>
<tr>
<th>Project Development Scenario</th>
<th>Project Residents</th>
<th>PRP Long-Range Goal (Acres)</th>
<th>PRP Short- and Intermediate-Range Goal (Acres)</th>
<th>Acres Required to Satisfy PRP Long-Range Goals</th>
<th>Acres Required to Satisfy PRP Short- and Intermediate-Range Goals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Neighborhood Parks Requirement</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Option A</td>
<td>677</td>
<td>2 / 1,000 residents</td>
<td>1 / 1,000 residents</td>
<td>1.35</td>
<td>0.68</td>
</tr>
<tr>
<td>Option B With Office</td>
<td>600</td>
<td>2 / 1,000 residents</td>
<td>1 / 1,000 residents</td>
<td>1.20</td>
<td>0.60</td>
</tr>
<tr>
<td>Option B Without Office</td>
<td>808</td>
<td>2 / 1,000 residents</td>
<td>1 / 1,000 residents</td>
<td>1.62</td>
<td>0.81</td>
</tr>
<tr>
<td>Community Parks Requirement</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Option A</td>
<td>677</td>
<td>2 / 1,000 residents</td>
<td>1 / 1,000 residents</td>
<td>1.35</td>
<td>0.68</td>
</tr>
<tr>
<td>Option B With Office</td>
<td>600</td>
<td>2 / 1,000 residents</td>
<td>1 / 1,000 residents</td>
<td>1.20</td>
<td>0.60</td>
</tr>
<tr>
<td>Option B Without Office</td>
<td>808</td>
<td>2 / 1,000 residents</td>
<td>1 / 1,000 residents</td>
<td>1.62</td>
<td>0.81</td>
</tr>
<tr>
<td>Combined (Neighborhood and Community) Parks Requirement</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Option A</td>
<td>677</td>
<td>4 / 1,000 residents</td>
<td>2 / 1,000 residents</td>
<td>2.71</td>
<td>1.35</td>
</tr>
<tr>
<td>Option B With Office</td>
<td>600</td>
<td>4 / 1,000 residents</td>
<td>2 / 1,000 residents</td>
<td>2.40</td>
<td>1.20</td>
</tr>
<tr>
<td>Option B Without Office</td>
<td>808</td>
<td>4 / 1,000 residents</td>
<td>2 / 1,000 residents</td>
<td>3.23</td>
<td>1.62</td>
</tr>
</tbody>
</table>

Source: Matrix Environmental, 2010

When Option A’s 677 residents are added to the projected 2015 population, based on City Planning Department data, there would be 81,547 persons within the Community Plan area. Adding Option A’s population to the General Plan Framework Element forecast yields a 2015 population forecast for the Community Plan area of 86,905 persons. While there are no plans to increase park and recreation facilities within the Community Plan area, the increase in residents under Option A would not be substantial enough to cause a further reduction in the parks-to-person ratio within the West Los Angeles Community Plan Area. Specifically, under Option A, based on the population forecast that uses City Planning Department data, the parks-to-person ratio would remain at 0.68 acres per 1,000 residents (55.09 ÷ (81,547 ÷ 1,000)). However, using the General Plan Framework forecast for this calculation results in a reduction in parks-to-person ratio from 0.68 to 0.63 acres per 1,000 residents. Similarly, even if the additional 808 residents under the Option B Without Office Scenario were added to the projected 2015 population, based on the population forecast that uses City Planning Department data, the ratio would
experience a negligible reduction to 0.67 acres per 1,000 residents \((55.09 \div (81,678 \div 1,000))\). The parks service ratio further declines to 0.63 acres per 1,000 residents based on the General Plan Framework Element forecast. It is important to note that this analysis is conservative in that it assumes that the Project residents would only utilize parks and recreation facilities located within the West Los Angeles Community Plan area, whereas the potential exists that residents would also utilize LADRP facilities within the vicinity of the Project Site, but outside the jurisdictional boundaries of the West Los Angeles Community Plan area, as well as the nearby parks located within the City of Beverly Hills.

Under Option A, the Proposed Project would provide approximately 3.32 acres of common open area space that would primarily consist of an extensively landscaped plaza area accessible from Avenue of the Stars, as well as landscaped rooftop terraces. Additionally, a fitness area and pool would be provided for the Proposed Project’s residents and hotel guests. Similarly, the Option B Without Office Scenario would provide approximately 3.32 acres of common open space. Under the Option B With Office Scenario, a hotel of approximately 3.38 acres of common open space would be available.

The amount of common open space provided under Option A and Option B would exceed the PRP’s long-range as well as short- and intermediate range goals. As indicated in the discussion of the LAMC Code above, outdoor landscaped areas may be credited against a project’s land dedication requirement if approved by the City’s Advisory Agency. As detailed in Table IV.L-16 on page IV.L-95, in order to meet the PRP’s long range standard (i.e., 4 acres/1,000 residents), the City’s Advisory Agency would need to conclude that, at least, approximately 82 percent of the common open space under Option A would function as open space that meets the resident’s park and recreational needs. Moreover, the Option A Scenario substantially exceed the PRP’s short- and intermediate-range standards. For instance, in order to meet the PRP’s short- and intermediate-range standard (i.e., 2 acres/1,000 residents), the City’s Advisory Agency would need to conclude that, at least, approximately 41 percent of the common open space under Option A would function as open space that meets the resident’s park and recreational needs. Under these conditions, Option A would be consistent with all of the PRP’s quantifiable standards. Should the City’s Advisory Agency conclude that lower percentages of Option A’s common open space areas would qualify as meeting the resident’s park and recreational needs, then Option A would fall short of meeting the PRP’s quantifiable standards. When considering the park and recreational value of Option A’s common open space areas it is important to note that not only would the common open space include extensive landscaping, multiple water features, and outdoor seating areas and gathering spaces, and thus creating a more inviting, aesthetically pleasing environment, it would convert what is currently a single-function private use to an attractive and publicly accessible recreational environment in an area of the City where such spaces are in limited supply.
### Table IV.L-16
**Project Requirements to Satisfy Public Resources Plan Open Space Goals**

<table>
<thead>
<tr>
<th>Project Development Scenario</th>
<th>Acres Required to Meet PRP Long-Range Goals</th>
<th>Acres Required to Meet PRP Short- and Intermediate-Range Goals</th>
<th>Common Open Space Provided by the Proposed Project</th>
<th>Percentage of the Total Common Open Space Required to Meet PRP Long-Range Goals</th>
<th>Percentage of the Total Common Open Space Required to Meet PRP Short- and Intermediate-Range Goals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Option A</td>
<td>2.71</td>
<td>1.35</td>
<td>3.32</td>
<td>82%</td>
<td>41%</td>
</tr>
<tr>
<td>Option B With Office Scenario</td>
<td>2.40</td>
<td>1.20</td>
<td>3.32</td>
<td>72%</td>
<td>36%</td>
</tr>
<tr>
<td>Option B Without Office Scenario</td>
<td>3.23</td>
<td>1.62</td>
<td>3.38</td>
<td>96%</td>
<td>48%</td>
</tr>
</tbody>
</table>

*Source: Matrix Environmental, 2010*

With regard to the Option B Without Office Scenario, if the City’s Advisory Agency would need to conclude that, at least, approximately 96 percent of the common open space under the Option B Without Office Scenario would function as open space that meets the resident’s park and recreational needs. Moreover, the Option B Without Office Scenario substantially exceed the PRP’s short- and intermediate-range standards. For instance, to meet the PRP’s short- and intermediate-range standard, the City’s Advisory Agency would need to conclude that, at least, approximately 48 percent of the common open space under the Option B Without Office Scenario would function as open space that meets the resident’s park and recreational needs. Should the City’s Advisory Agency conclude that lower percentages of Option B Without Office Scenario’s common open space areas would qualify as meeting the resident’s park and recreational needs, then the Proposed Project may fall short of meeting the PRP’s open space goals. As is this case with Option A, when considering the park and recreational value of Option B Without Office Scenario’s common open space areas it is important to note that not only would the common open space include extensive landscaping, multiple water features, and outdoor seating areas and gathering spaces, and thus creating a more inviting, aesthetically pleasing environment, it would convert what is currently a single-function private use to an attractive and publicly accessible park and recreational environment in an area of the City where such spaces are in limited supply.

With respect to the Proposed Project’s open space requirements as they relate to the PRP, the Proposed Project’s residents under the Option A Scenario would require 2.71 acres of park space to meet the PRP’s long-range goals and 1.35 acres of park space to
meet the PRP’s short- and intermediate-term goals. As Option A would provide approximately 3.32 acres of common landscaped open area, the PRP’s long-range goals would be exceeded by 0.61 acres and the PRP’s short- and intermediate-term goals would be exceeded by 1.97 acres. Similarly, the Option B Without Office Scenario resident population would require 3.23 acres of park space to meet the PRP’s long-range goals and 1.62 acres to meet the PRP’s short- and intermediate-term goals. As the Option B Without Office Scenario would provide approximately 3.38 acres of common open space area, the Option B Without Office Scenario would exceed the PRP’s long-range goals by 0.15 acres and the PRP’s short- and intermediate-term goals would be exceeded by 1.76 acres. As such, both Option A and Option B of the Proposed Project would exceed the long-range and short- and intermediate-range goals of the PRP and would improve the park-to-person ratio in the Community Plan area. In addition, the common open space provided by the Proposed Project would reduce the demand for LADRP park and recreation services within the West Los Angeles Community Plan area. Lastly, under both options, the Proposed Project would provide a unique and valuable respite from the surrounding urban environment, converting what is currently a single-function private use to an attractive and accessible community gathering space.

Also of note in considering these conclusions is that neither Option A nor Option B, as analyzed above, would add a sufficient residential population to alter the parks-to-person ratio over future conditions without Option A or Option B. Further, as analyzed below, both Option A and Option B would meet or exceed all LAMC park and recreational space requirements.

(ii) Los Angeles Municipal Code

Pursuant to LAMC Section 12.21, new construction in the City of six or more dwelling units on a lot is required to provide at a minimum 100 square feet of usable open space for each dwelling unit having less than three habitable rooms; 125 square feet for each dwelling unit having three habitable rooms; and 175 square feet for each dwelling unit having more than three habitable rooms. Applying these standards to Option A, yields a requirement for the provision of a minimum of 49,675 square feet (1.14 acres) of usable open space. Option A would exceed this requirement in that it would provide a total of 166,188 square feet (3.82 acres) of usable open space. Of this total, approximately 144,380 square feet (3.32 acres) would be provided as common open space, in which the ground-level public plaza would comprise approximately 61 percent (88,676 square feet or 2.04 acres). Option A would also provide 21,808 square feet (0.50 acre) of private open space in the form of private balconies, roof terrace, and garden that would be accessible to residents of the Project’s individual dwelling units. As such Option A would meet and exceed the open space requirements of LAMC Section 12.21 and a less than significant impact would result.
Of the two Option B Scenarios, the Option B Without Office Scenario would result in the development of a greater number of residential units (363 residential units vs. 271 residential units). As such, to provide a conservative analysis, the following focuses on the requirements associated with the Office B Without Office Scenario. Under LAMC Section 12.21, the Option B Without Office Scenario would be required to provide 55,975 square feet (1.29 acres) of useable open space. The Option B Without Office Scenario would provide a total of 168,256 square feet (3.86 acres) of useable open space. Of this total, the Option B Without Office Scenario would include 147,269 square feet (3.38 acres) of common open space, of which the public plaza would comprise 84,231 square feet (1.93 acres). In addition to the common open space, the Option B Without Office Scenario would provide approximately 0.48 acres of private open space in the form of private balconies and roof terraces that would be accessible to residents of the Project’s individual dwelling units. As such, Option B would meet and exceed the open space requirements of LAMC Section 12.21 and a less than significant impact would result.

Notwithstanding the analysis above, there is the potential that subject to the City’s review, that the Proposed Project’s open space would not satisfy the requirements of LAMC Section 17.12 through dedication of land or the allowable credits for the construction of common open space areas. Thus, pursuant to the provisions of LAMC Section 17.12 and in accordance with Mitigation Measure L-8 below, the Proposed Project would instead pay in-lieu fees for any shortfall as determined by the City. Further, the new landscaped open space provided as part of the Proposed Project could be credited against the total parkland dedication requirement or the total in-lieu park fee requirement, as determined by the City. Thus, with compliance with LAMC Section 17.12 and the provision of on-site recreational facilities, and/or the payment of in-lieu fees, impacts would be less than significant.

Furthermore, both Option A and B would pay the requisite fees required under LAMC Section 21.10.3(a)(1) (Dwelling Unit Construction Tax). Pursuant to the provisions set forth therein, the payment of fees pursuant to LAMC Section 17.12 or the dedication of parkland or recreational facilities would be credited towards the fees required under LAMC Section 21.10.3(a)(1). Thus, with compliance with LAMC Section 21.10.3(a)(1), impacts with regard to these LAMC provisions would be less than significant.

(d) Extended Horizon Analysis

While the Applicant intends to complete construction of the Proposed Project by 2015, it is at least possible that the Proposed Project might not be completed until as late as 2027. As noted in Section II (Project Description) of this Draft EIR, the Applicant requests approval of a Development Agreement (“DA”) which would confer on the Applicant a vested right to develop the Proposed Project throughout the term of the
agreement. It is expected that the DA would be approved in 2012 and the terms of the agreement would be for a period of 15 years, thereby expiring in 2027. In the unlikely event that the Project buildout year was to be extended by 12 years to coincide with the anticipated expiration of the term of the DA in 2027, the conclusions regarding the Proposed Project’s impacts on parks and recreational facilities would not change. Both Option A and Option B would continue to provide the same types and amount of on-site open space and recreational amenities if the Project buildout year was extended to 2027. The provision of these spaces would have the same potential to reduce the increase in demand on area-wide LADRP parks and recreation facilities that on-site residents, employees, and visitors could potentially create. Similarly, the additional demand that could be generated by Option A and Option B residents for parks within the West Los Angeles Community Plan area would be the same in 2027. Additionally, both Option A and Option B (both Scenarios) would continue to meet or exceed all LAMC park and recreational space requirements as well as the PRP’s long-range and short- and intermediate-range standards. Finally, both Option A and Option B (both Scenarios) would be subject to the same mitigation measure requiring the payment of in-lieu fees if the City does not credit sufficient portions of the Proposed Project’s open space and recreational facilities towards meeting the requirements of LAMC Section 17.12. Therefore, the conclusions regarding the Proposed Project’s impacts on parks and recreational facilities would not change. With regard to the potential for cumulative impacts to change due to additional population growth through 2027, see the Cumulative Impacts discussion, below.

d. Cumulative Impacts

The geographic context for the cumulative impact analysis for parks and recreation is the West Los Angeles Community Plan area. The buildout year for the Proposed Project is 2015. Therefore, cumulative impacts on parks and recreation were analyzed relative to the 2015 growth projected within the West Los Angeles Community Plan area. As discussed in Section IV.K (Population and Housing) of this Draft EIR, the Draft EIR’s population analysis uses two different forecasts. Based on the forecast using City Planning Department data, the growth projections place the West Los Angeles Community Plan area 2015 population at 80,870 persons, resulting in a growth of 2,772 persons over 2010 conditions. Under the General Plan Framework Element forecast, a total of 86,288 persons would be residing in the West Los Angeles Community Plan area in 2015, a growth of 2,958 persons over 2010 conditions. It is important to note that these projections account for continued growth in the Community Plan area. However, in order to provide a conservative analysis, the additional residents generated by the related projects were considered to be new residents above the Community Plan area’s 2015 population projections.
Of the 155 related projects identified in Section II (Environmental Setting) of this Draft EIR, 87 projects are located within the City of Los Angeles. The other 68 related projects are located in the City of Beverly Hills (40) and the City of West Hollywood (28). Of the 87 related projects in the City of Los Angeles, 56 include non-residential components and 55 include residential components (some mixed-use projects include both). Forty-five of the related projects are contained within the boundaries of the West Los Angeles Community Plan Area. Of these 45 related projects, 29 include non-residential components and 28 include residential components (some mixed-use projects include both). Since the Community Plan Area is the geographical area used by the LADRP to determine service levels and permanent residents are considered to be the primary users of parks services, only the 28 residential projects located within the West Los Angeles Community Plan area were considered for the purposes of this cumulative analysis. As discussed in Section IV.K (Population and Housing) of this Draft EIR, these 28 related projects would generate a total of an additional 4,661 persons that would reside in the West Los Angeles Community Plan area.

As shown in Table IV.L-17 on page IV.L-100 based on this level of cumulative growth within the West Los Angeles Community Plan area, an additional 9.32 acres of neighborhood parkland would need to be provided to meet the PRP’s long-range standard of two acres per 1,000 residents and approximately 4.66 acres would need to be provided to meet the PRP’s more attainable short- and intermediate-range standard of one acre per 1,000 residents. In addition, relative to the PRP standards for community parks, 9.32 acres of community parkland would need to be provided to meet the PRP’s long-range standard of two acres per 1,000 residents and approximately 4.66 acres would need to be provided to meet the PRP’s more attainable short- and intermediate-range standard of one acre per 1,000 residents. In total, the cumulative growth within the West Los Angeles Community Plan area would require a total of 18.64 acres of combined neighborhood and community parkland to meet the PRP’s long-range objectives and 9.32 acres to achieve the PRP’s short- and intermediate-range goals for parkland.

As also shown on Table IV.L-17, when the residents under Option A (677 residents) are added to the residents generated by the related projects (4,661 residents), a total of 10.68 acres of neighborhood parkland would need to be provided to meet the PRP’s long-range standard of two acres per 1,000 residents and approximately 5.34 acres would need to be provided to meet the PRP’s more attainable short- and intermediate-range standard of one acre per 1,000 residents. In addition, relative to the PRP standards for community parks, 10.68 acres of community parkland would need to be provided to meet the PRP’s long-range standard of two acres per 1,000 residents and approximately 5.34 acres would need to be provided to meet the PRP’s more attainable short- and intermediate-range standard of one acre per 1,000 residents. In total, Option A in combination with the cumulative growth within the West Los Angeles Community Plan area would require a total
Table IV.L-17
Cumulative Growth Public Resources Plan Open Space Goals

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<td>21.87</td>
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Source: Matrix Environmental, 2010

of 21.36 acres of combined neighborhood and community park land to meet the PRP’s long-range objectives and 10.68 acres to achieve the PRP’s short- and intermediate-range goals for parkland.
As shown on Table IV.L-18 on page IV.L-102, when the population generated under Option A (677 persons) is added to the population of the related projects (4,661 persons), the total cumulative increase in resident population (5,338 persons) would cause the park-per-person ratio to drop from 0.68 to 0.64 acres per 1,000 residents \( \left( \frac{55.09}{(86,208 ÷ 1,000)} \right) \). Since the desired long-range standard for local parks is two (2) acres per 1,000 persons for neighborhood parks and two (2) acres per 1,000 persons for community parks or four (4) acres per 1,000 persons of combined neighborhood and community parks, this results in a deficiency of 3.36 acres of neighborhood and community parks per 1,000 persons to meet the long-range standards established in the PRP. The PRP notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes the more attainable short- and intermediate-range standards of two (2) acres per 1,000 people of combined neighborhood and community parks. However, this would still result in a combined deficiency of 1.36 acres of neighborhood and community parks for the short- and intermediate-range standard.

As shown above in Table IV.L-17 on page IV.L-100, when the residents under the Option B Without Office Scenario (808 residents) are added to the residents generated by the related projects (4,661 residents), a total of 10.94 acres of neighborhood parkland would need to be provided to meet the PRP’s long-range standard of two acres per 1,000 residents and approximately 5.47 acres would need to be provided to meet the PRP’s more attainable short- and intermediate-range standard of one acre per 1,000 residents. In addition, relative to the PRP standards for community parks, 10.94 acres of community parkland would need to be provided to meet the PRP’s long-range standard of two acres per 1,000 residents and approximately 5.47 acres would need to be provided to meet the PRP’s more attainable short- and intermediate-range standard of one acre per 1,000 residents. In total, the cumulative growth within the West Los Angeles Community Plan area would require a total of 21.87 acres of combined neighborhood and community park land to meet the PRP’s long-range objectives and 10.94 acres to achieve the PRP’s short- and intermediate-range goals for parkland.

As shown on Table IV.L-18, when the resident population generated under the Option B Without Office Scenario (808 persons) is added to the population of the related projects (4,661 persons), the total cumulative increase in resident population (5,469 persons) would cause the park-per-person ratio to drop from 0.68 to 0.64 acres per 1,000 residents \( \left( \frac{55.09}{(86,339 ÷ 1,000)} \right) \), as is also the case under Option A. Since the desired long-range standard for local parks is based on two (2) acres per 1,000 persons for neighborhood parks and two (2) acres per 1,000 persons for community parks or four (4) acres per 1,000 persons of combined neighborhood and community parks, this results in a deficiency of 3.36 acres of neighborhood and community parks per 1,000 persons to meet the long-term standards established in the PRP, and 1.36 acres of neighborhood and community parks to achieve the PRP’s short- and intermediate-range goals for parkland.
While the proposed Project in conjunction with future development projects would cumulatively generate the need for additional parks and recreation facilities, future development projects would be required to comply with the parks and recreation requirements of the Quimby Act and LAMC. In particular, all residential subdivisions would be subject to the requirements of Section 17.12 and 12.21.G and would be required to provide adequate open space. Therefore, potential cumulative impacts on parks and recreation would be less than significant.

Furthermore, as with the proposed Project, these related projects would be subject to discretionary review by the City, would be required to implement mitigation measures to ensure that no significant impacts to park and recreational services would occur, and would be required to comply with the parks and recreation requirements of the Quimby Act and the LAMC. In addition, the Proposed Project would provide open space to offset the increase in demand for parks and recreation facilities generated by the Proposed Project or
pay development impact fees in accordance with Mitigation Measure L-5, as well as converting what is currently a single-function private use to an attractive and publicly accessible community gathering space.

As discussed above, the potential exists for the Project buildout year to be extended by 12 years to coincide with the anticipated expiration of the term of the DA in 2027. In the unlikely event that this was to happen, cumulative impacts to parks and recreational service would remain less than significant. As discussed in Section IV.K (Population and Housing) of this Draft EIR, the cumulative population and housing growth from the Proposed Project and the related projects in the City of Los Angeles would be within the Southern California Association of Governments (SCAG)’s forecasted population and housing growth for the City of Los Angeles Subregion for 2015 under both Option A and Option B. As SCAG forecasts increase over time, the Proposed Project and the related projects would also be within future growth projections for 2025 and 2030, the projection years closest to the conceivable buildout date of 2027.60 SCAG forecasts form the basis for updating the General Plan Framework, which in turn sets a long-term growth strategy for updating the Community Plans and General Plan Elements. Thus, the Project and the related projects’ consistency with SCAG growth forecasts implies that they would be accounted for in the City’s long-term growth planning for parks and other public facilities throughout 2027. Furthermore, all future development projects through 2027 would be subject to discretionary review by the City, would be required to implement mitigation measures to reduce impacts to park and recreational services to the extent feasible, and would be required to comply with the parks and recreation requirements of the Quimby Act and the LAMC, including Sections 17.12 for residential subdivisions and 12.21.G for all residential projects. Therefore, the conclusions regarding cumulative impacts to parks and recreational facilities presented in this section for Option A, the Option B With Office Scenario, and the Option B Without Office Scenario would not change if the Project buildout year was to be extended to 2027.

Overall, the Proposed Project would not have a cumulatively considerable effect on parks and recreational services under both Option A and Option B.

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60 As discussed in Section IV.K (Population and Housing) of this Draft EIR, SCAG forecasts are provided in 5-year increments.
e. Mitigation Measures

The Proposed Project under both Option A and Option B would increase the demand for recreation and park facilities within the West Los Angeles Community Plan area. Although the Proposed Project would provide common landscaped open space in quantities that exceed the space requirements of LAMC 17.12, as well as fitness centers and pools accessible to Project residents and hotel guests, there is the potential that the City may not credit sufficient portions of the Proposed Project’s open space and recreational facilities towards meeting the requirements of LAMC Section 17.12. In this event, the Proposed Project, under both Option A and Option B, would be required to pay in-lieu fees for the shortfall in the provision of recreational facilities and parks, in accordance with the following Mitigation Measure:

L-5 For any shortfall in the provision of recreational facilities and parks pursuant to the requirements of LAMC Section 17.12, the Project Applicant shall pay in-lieu fees for the dedication of park land as established by LAMC Section 17.12.

f. Level of Significance After Mitigation

Option A and Option B, either through the provision of on-site areas that would meet the park and recreational needs of its residents, or via implementation of Mitigation Measure L-5 above, the Project’s impacts with respect to recreation and park space would be reduced to a less than significant level.