

IV. ENVIRONMENTAL IMPACT ANALYSIS

L. RECREATION AND PARKS

1. INTRODUCTION

This section discusses the physical setting and provides analysis of recreational services and parks in the area where the proposed Project would be developed. The information contained in this section is derived primarily from the City of Los Angeles Department of Recreation and Parks.

2. ENVIRONMENTAL CONDITIONS

a. Physical Setting

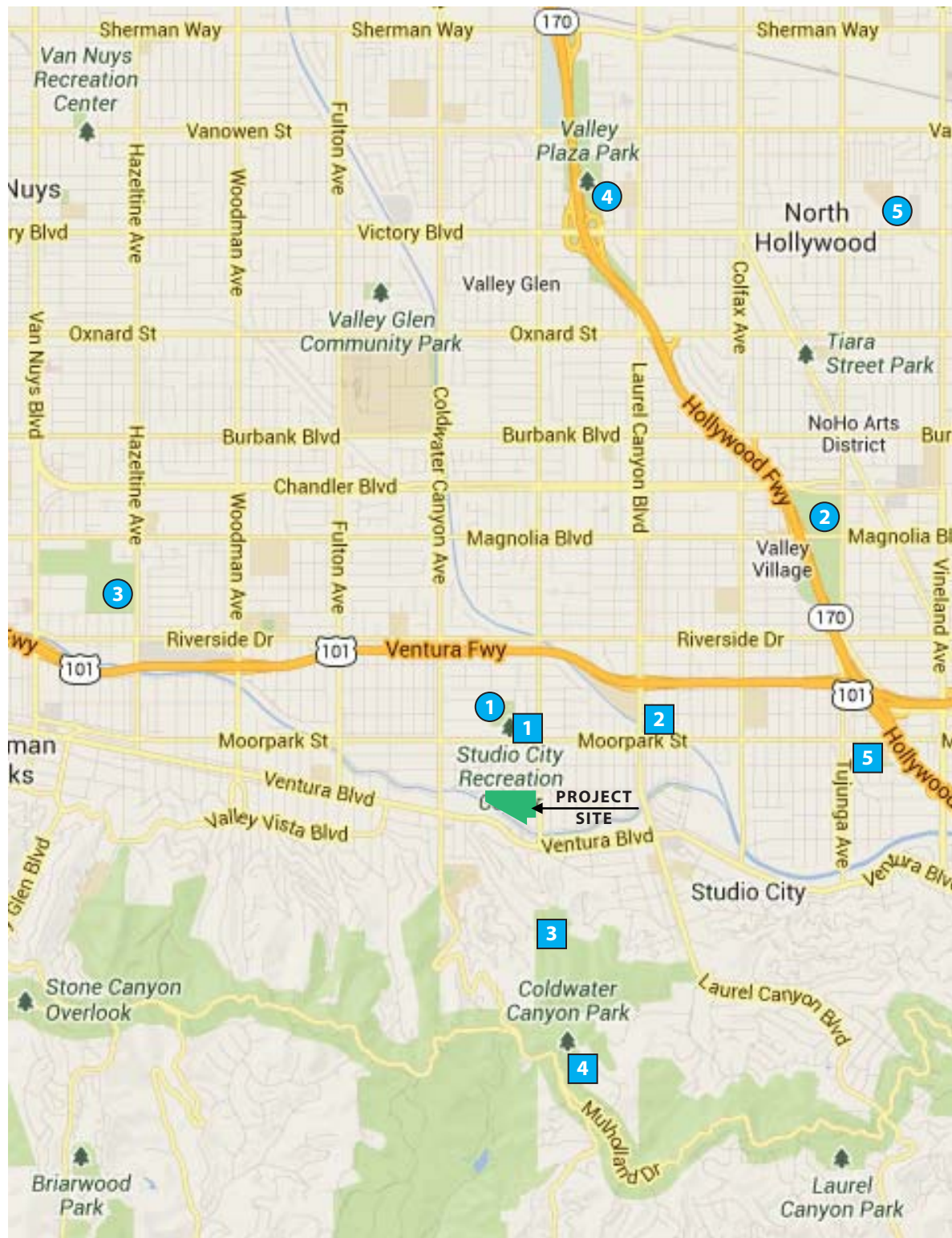
The City of Los Angeles Department of Recreation and Parks (DRP or the Department) is responsible for the operation, maintenance and provision of parks and recreational facilities throughout the City of Los Angeles, including the Project vicinity. The DRP's facilities are diverse and include approximately 15,000 acres of parkland with over 400 neighborhood and regional parks, eleven lakes, and more than 180 recreation and community centers. The Department operates two beaches plus the Venice Beach Ocean Front Walk. The City also operates Griffith Park, which includes the Observatory, the Greek Theater, three golf courses, the Equestrian Center, miles of hiking and riding trails, Travel Town, the Los Angeles Zoo, the Gene Autry Museum, a carousel, pony trail rides, a swimming pool, Friendship Auditorium, and other facilities. The DRP has, in addition to its parkland and numerous recreational facilities, programs, classes, and activities for children and adults. In addition to adult classes, sports leagues, and the country's largest municipal golf program, the DRP is a premier provider for children's programs in the City of Los Angeles, with after school programs, 26 licensed child care facilities, and sports programs at most of its facilities. The Department serves more than 1,000 children in its after school programs and more than 60,000 youths in its sports leagues.¹

The DRP completed its "2009 Citywide Community Needs Assessment" from which recommendations have been or will be implemented to develop more parks and recreational facilities and update facilities that are in disrepair.²

There are five parks within two miles of the Project Site and five tennis facilities within four miles that are operated and maintained by the DRP. *Table IV.L-1: Park and Tennis Facilities in the Project Site Vicinity* lists the nearest facilities and their attributes. *Figure IV.L-1: Location of Park and Tennis Facilities in the Project Site Vicinity* shows the location of these parks and tennis facilities.

¹ City of Los Angeles Department of Recreation and Parks Website, <http://www.laparks.org/dept.htm>. Accessed April 27, 2012.

² City of Los Angeles Department of Recreation and Parks, *2009 Citywide Community Needs Assessment*.



- # PARKS
- # TENNIS FACILITY

FIGURE IV.L-1
LOCATION OF PARK AND TENNIS FACILITIES
IN THE PROJECT SITE VICINITY

SOURCE: MAPS.GOOGLE.COM



**TABLE IV.L-1
 PARK AND TENNIS FACILITIES IN THE PROPERTY VICINITY¹**

NO. AND FACILITY NAME (KEYED TO FIGURE IV.L-1)	ADDRESS	SIZE	DISTANCE FROM PROJECT SITE (MILES)	AMENITIES
Parks				
1. Studio City Mini-Park	12505 Moorpark Street Studio City, CA	Pocket park	0.34	Information Not Available
2. Moorpark Park	12061 Moorpark Street Studio City, CA	Pocket park	0.63	Children's play area and picnic tables.
3. Wilacre Park	12601 Mulholland Drive Studio City, CA	128 acres	1.17	Open grass wild area that is maintained by the Santa Monica Conservancy.
4. Coldwater Canyon Park	12601 N. Mulholland Drive Beverly Hills, CA	45 acres	1.41	Bike path, hiking trails, jogging path.
5. Woodbridge Park	11240 Moorpark Street Studio City, CA	Pocket park	1.71	Children's play area and picnic tables.
Tennis Facilities				
1. Studio City Tennis Court (at Beeman Park)	12621 Rye Street Studio City, CA	N/A	0.41	Four unlighted tennis courts.
2. North Hollywood Tennis Court	11430 Chandler Blvd. North Hollywood, CA	N/A	2.08	Five lighted tennis courts.
3. Van Nuys Sherman Oaks Tennis Courts	14201 Huston Street Sherman Oaks, CA	N/A	2.31	Eight lighted tennis courts.
4. Valley Plaza Tennis Court	12240 Archwood Street North Hollywood, CA	N/A	3.12	Four lighted tennis courts.
5. Victory Vineland Tennis Courts	11117 Victory Boulevard North Hollywood, CA	N/A	3.46	Two lighted tennis courts.
¹ Source: City of Los Angeles Department of Recreation and Parks, Facility Locator, http://www.laparks.org/dept.htm . Accessed April 27, 2012.				

Additionally, there are seven pay tennis court complexes within a ten-mile radius of Studio City, including³:

- Balboa Pay Tennis Complex (16 courts) located at 16821 Burbank Boulevard in Encino;
- Cheviot Hills Tennis Courts (14 courts) located at 2551 Motor Avenue in Los Angeles;
- Griffith-Riverside Tennis Courts (12 courts) located at 3401 Riverside Drive in Los Angeles;
- Griffith-Vermont Tennis (12 courts) located at Vermont Entrance to Griffith Park in Los Angeles;
- Pacific Palisades Tennis Courts (8 courts) located at 851 Alma Real Drive in Pacific Palisades;

³ Correspondence letter from Manuel A. Mollinedo, City of Los Angeles, Privately-Owned Golf and Tennis Facilities/Study – CF 02-0974, July 9, 2002, contained in *Appendix O: Privately-Owned Golf and Tennis Facilities Study* of this Draft EIR.

- Poinsettia Tennis Courts (8 courts) located at 14201 Huston Street in Van Nuys; and,
- Westwood Tennis Complex (8 courts) located at 1350 Sepulveda Boulevard in Los Angeles.

The Project Site is currently occupied by the Weddington Golf and Tennis Club, a privately-owned recreational facility that has been in operation for nearly 60 years. The facility has a long history of providing recreational opportunities (primarily golf) for local schools, amateur leagues and the general public. Originally opened in 1956 with only golf facilities, tennis courts were added in the 1970s. Initially, four courts were installed. Additional courts were added for a total of twenty courts by the 1990s. In 1997, four of the tennis courts were demolished to accommodate construction of City of Los Angeles Fire Station No. 78, located adjacent to the southeast corner of the Project Site. With the closure of several tennis facilities, the Weddington Golf and Tennis Club has become one of the few remaining privately-owned facilities in the City of Los Angeles that are open to the public for play. Currently, the Project Site remains developed with an executive 9-hole (3 par) pitch-and-putt golf course, 24-stall driving range, a clubhouse, and 16 lighted tennis courts and related facilities.

b. Regulatory and Policy Setting

(1) *Quimby Act*

Section 66477 of the California Government Code, also known as the Quimby Act, was enacted in order to promote the availability of park and open space areas in response to the state's rapid urbanization and the decreasing acres of parks and recreational facilities. The goal of the Quimby Act is to require developers to mitigate the impacts of property development and fund parkland improvements. The act gives authority for passage of land dedication ordinances only to cities and counties. Special districts must work with cities and/or counties to receive parkland dedication and/or in-lieu fees. The in-lieu fees are paid and land conveyed directly to the local public agencies that provide park and recreation services on a community-wide basis.

In 1982, the Quimby Act was amended to hold local governments accountable for imposing park development fees. Assembly Bill (AB) 1600 requires agencies to clearly show a reasonable relationship between the public need for the recreation facility or park land and the type of development project upon which the fee is imposed. Cities and counties were required to be more accountable and to show a strong direct relationship or nexus between the park fee exactions and the proposed project. Local ordinances must now include definite standards for determining the proportion of the subdivision to be dedicated and the amount of the fee to be paid.⁴

(2) *City of Los Angeles General Plan*

Recreation services are primarily provided by the City's Recreation and Parks Department. The City owns a total of approximately 15,000 acres of parkland, the largest being Griffith Park with over 4,000 acres. Included in these parklands are facilities such as horticulture centers, museums,

⁴ California State Parks, Planning Division, Quimby Act 101, By Laura Westrup, Summer 2002, Volume 8, No. 3, pg. 8.

and historic sites. Recreational services are also available to City residents from sites and facilities owned and operated by Los Angeles County (primarily beaches), the State of California, the National Park Service, and the National Forest.

In 1980, the City of Los Angeles adopted the Public Recreation Plan (PRP), which is a portion of the Service Systems Element of the Los Angeles City General Plan.⁵ The PRP emphasizes neighborhood and community recreation sites, community buildings, gymnasiums, swimming pools, and tennis courts. Additionally, the PRP sets forth recreation standards intended to provide a basis for satisfying the need for neighborhood and community recreational sites. The PRP emphasizes neighborhood and community recreational sites and parks because of their immediate importance to the daily lives of the City's people, especially its children. The objectives of the PRP are based on recognized planning principles and the extent and nature of deficiencies in the City's recreational facilities. These objectives include:

- To provide a guide for the orderly development of the City's public recreational facilities;
- To provide long-range standards for use in connection with new subdivisions, intensification of existing residential development, or redevelopment of blighted residential areas as described under general local recreation standards;
- To develop and locate public facilities to provide the greatest benefit to the greatest number of people at the least cost and with the least environmental impact;
- To provide a guide of priorities for the acquisition and development of public recreational facilities; and,
- To further refine and carry out the goals and objectives set forth in the Concept and Citywide Plan for recreation.

The PRP provides long-range standards for Neighborhood Recreational Sites and Community Recreational Sites. Both Neighborhood and Community Recreational Sites should be provided at a minimum of 2 acres per 1,000 persons. The PRP also provides short and intermediate range community plan standards for Neighborhood and Community Parks. The short and intermediate plan standard for Neighborhood Parks is 1 acre per 1,000 persons in a 1-mile radius of the park and for Community Parks is 1 acre per 1,000 persons in a 2-mile radius.

Also, to ensure that the City of Los Angeles provides enough tennis courts to adequately service its recreational users, the following tennis court related policies are established in the PRP:

- Tennis service levels will be based on the needs of the local population between the ages of 10 to 61. It is this age range which most use tennis courts; and,

⁵ City of Los Angeles General Plan, Public Recreation Plan, Service Systems Element of the Los Angeles General Plan, 1980.

- Use of existing and future tennis courts should be maximized through design, lighting and operation.

The following programs are provided in the PRP to ensure an adequate number of tennis courts to service the City's recreational needs. These programs include:

- Use the areas of Public Tennis Court Deficiency identified in the PRP Background Report as guides for locating new tennis facilities as funds become available. A program for updating the Table and the Public Tennis Court Maps by the Department of Recreation and Parks and the Planning Department should be initiated as important changes in population, land use and facilities occur;
- Continue the program of designing new facilities with night lighting adequately shielded to assure the privacy of adjacent residential uses;
- Continue the program of illuminating unlighted public park tennis courts and encourage lighting of school tennis facilities in tennis court deficient areas when funds become available; and,
- Continue the program of building tennis courts in groups rather than one at a time.

According to the 2009 Needs Assessment, the City targets a guideline of providing 1 tennis court for every 10,000 population.

(3) *Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan*

The Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan identifies regional, community and neighborhood parks in the Plan Area. There are five Neighborhood Parks and two Community Parks which serve the Community Plan Area. Additionally, two golf courses are also located within the Plan Area, one publicly-owned and the other privately-owned. The Community Plan Area, with its diverse topography, limits the placement of park sites south of Ventura Boulevard. Thus, those neighborhood parks located south of Ventura Boulevard offer limited recreational facilities for hillside homeowners. While the existing parks satisfy the needs of the current residents, according to the Community Plan, the community is still deficient in the number of neighborhood parks. The following goal, objective and policies are provided in this Community Plan to ensure that park and recreational facilities are adequately provided to the residents within the plan's jurisdiction.⁶

Goal 4: Adequate recreation and park facilities to meet the needs of the residents in the plan area.

Objective 4-1: To conserve, maintain and better utilize existing recreation and park facilities, which promote the recreational experience.

⁶ City of Los Angeles Department of City Planning, Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, May 13, 1998, pgs. III-11 and III-12.

Policy 4-1.1: Preserve the existing recreational facilities and park space.

Policy 4-1.2: Increase accessibility to The Los Angeles River.

The DRP and Department of City Planning use the Community Plan to assist in preserving recreational facilities and park space by changing existing zoning and land use designation on chosen sites to the Open Space Zone and Open Space designation, as applicable. Specifically, the Project Site's land use designation of Open Space was derived from a General Plan Amendment on the Project Site, which changed the land use designation from Residential to Open Space in order to recognize the Project Site as a contributing community recreational feature.

The Community Plan identifies two classifications for open space: Publicly-owned and privately-owned open space. In the Community Plan, open space is broadly defined as land which is essentially free of structures and buildings and/or is natural in character and which functions in recreational, scenic, preservation, or similar public service manner. Applicable open space goals, objectives, and policies in the Community Plan include:

Goal 5: A community with sufficient open space in balance with development to serve the recreational, environmental and health needs of the community and to protect environmental and aesthetic resources.

Objective 5-1: To preserve existing open space resources and where possible develop new open space.

Policy 5-1.1: Encourage the retention of passive and visual open space, which provides a balance to the urban development of the Plan Area.

Policy 5-1.2: Accommodate active parklands, and other open space uses.

Policy 5-1.3: Require development in major opportunity sites to provide public open space.

(4) *Los Angeles Municipal Code*

The Los Angeles Municipal Code (LAMC) provides standards for park and recreational facilities, the need for parks and recreational facilities based on the development of projects, and standards based on the Quimby Act. Section 12.21(u)(2) of the LAMC, which addresses senior independent housing provisions, requires that "at least ten square feet of indoor recreation space and at least 50 square feet of useable open space for each dwelling unit in the development, both of which shall be available and accessible to all residents of the development. The development of open space may be located on the ground, on terraces or on rooftops, but shall be landscaped or developed for active or passive recreation and may include roofed recreation areas, swimming pools, or unenclosed porches. The open space may also include walkways, but shall not include land used for required front or side yards, private streets, driveways, passageways, parking, loading or service areas."

LAMC Section 17.12, which addresses park and recreation site acquisition and development provisions, is based on the Quimby Act requirements to either dedicate park and recreational land or provide in-lieu fees for development of a project. Fees for park improvements may be paid to the DRP in lieu of the dedication of all or a portion of the land. The in-lieu fees are calculated per dwelling unit to be constructed.

Section 17.12 also provides for exemptions and credits to the dedication of park and recreational land and/or payment of in-lieu fees, if a development incorporates private park and recreational facilities into its design. Inclusive park and recreational uses of a development are required to meet the following standards to receive an exemption or credit: 1) each facility is available for use by all the residents of the project; and 2) the facilities satisfy the recreation and park needs of the project so as to reduce the need for public recreation and park facilities to serve the project's residents.

3. ENVIRONMENTAL IMPACTS

a. Methodology

Analysis is based on an assessment of the onsite Project facilities, anticipated Project population, and evaluation against the threshold criteria.

b. Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, the Project would have a significant impact on park and recreation areas if it would cause any of the following conditions to occur:⁷

- a.) 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 parks and recreational services.
- b.) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
- c.) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Furthermore, as set forth in the City of Los Angeles L.A. CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering several factors, including population, demand for recreation and park services, and assessment of project features

⁷ State of California, *California Environmental Quality Act: Guidelines*, http://ceres.ca.gov/topic/env_law/ceqa/guidelines (May 2011).

that would reduce demand for recreation facilities and park services. Based on these factors, the proposed Project would have a significant impact on parks and recreation, if:

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

c. Project Impacts

The Project Site is approximately 16.11 acres in size, all of which includes some recreational use as either a golf course, driving range, tennis courts, open space, or supporting facilities (i.e., parking lot, clubhouse, and putting green) necessary to support such recreational uses. Proposed Lot 1 is approximately 11.6 acres and is occupied by a 9-hole pitch-and-putt golf course, a 24-stall golf driving range, a clubhouse, and a surface parking lot. Proposed Lot 2 is approximately 4.5 acres and currently occupied by 16 lighted tennis courts, a small tennis house, and a surface parking lot. Implementation of the proposed Project would involve removal of the 16 tennis courts, tennis house, and a portion of the parking lot on Lot 2, followed by development of the 200-unit Studio City Senior Living Center (SCSLC) Project. Under the Project, existing golf course and driving range uses on Lot 1 would remain essentially unchanged and there would be no impact to golf recreational uses as a result of the Project.

Potential impacts on recreation and parks facilities would be two-fold: 1) the potential effect on the community due to the loss of 16 privately operated tennis courts; and 2) the potential effect on Citywide recreation and parks services due to the demand created by Project residents.

(1) Impact on Citywide Tennis Facilities

With the closure of several other tennis facilities in the City, the Weddington Golf and Tennis Club has become one of the few remaining privately-owned facilities that are open to the public for play in the City of Los Angeles and within the community of Studio City. Although there are many exclusive private golf and tennis facilities in the City of Los Angeles, there are a limited number of privately-owned facilities that are open to the public.

In 2002, the City of Los Angeles Department of Recreation and Parks completed its most current survey of 30 tennis facilities and 102 golf courses within the City of Los Angeles and County of Los Angeles.⁸ Only seven tennis facilities and 18 golf courses met the conditions of private ownership with open public accessibility. The survey indicated that most of the seven private tennis facilities draw their customers from a radius of about ten miles. The tennis facility at the Project Site attracts 50 percent of its customers from outside a ten-mile radius. Therefore, decreasing the number of tennis courts due to implementation of the Project may inconvenience current clientele of the Weddington Golf and Tennis Club.

⁸ Mollinedo, Manuel A., General Manager, City of Los Angeles, Department of Parks and Recreation, letter dated July 9, 2002 regarding Privately-Owned Golf and Tennis Facilities Study, contained in *Appendix O: Privately-Owned Golf and Tennis Facilities Study* in this Draft EIR.

It should be noted that according to the *2009 Citywide Community Needs Assessment* Final Report published by the DRP, there is general shortage of publicly owned park land in the City of Los Angeles, which typically means, there is also a shortage of public recreational facilities. According to the report, there are 321 public tennis courts within the City, which results in approximately one public tennis court for every 12,176 persons. However, the report was not inclusive of privately-owned tennis courts, such as those on the Project Site. Therefore, decreasing the number of privately-owned and paid tennis courts due to the Project would not result in a recreational impact to, or cause a reduction in, the 321 City-owned public tennis courts available to the public. Nor would the Project worsen the Citywide ratio of one public tennis court for every 12,176 persons.

As noted above, seven comparable pay tennis facilities are available for public play within a 10-mile radius of the Studio City community. Demolition of the 16 paid tennis courts at the Project Site would reduce the inventory of tennis courts within Studio City, the City of Los Angeles, and the County of Los Angeles, but would not significantly impact the tennis court inventory overall. Furthermore, according to the DRP's *2009 Citywide Community Needs Assessment*, outdoor tennis courts and facilities are generally considered medium to low priority recreational uses in most communities across the City. Although, tennis courts are given high priority in the South Valley, where the Project Site is located, a sufficient number of tennis facilities will continue to remain available through public and private facilities, as well as within school facilities in Studio City, the South Valley, and Citywide. Patrons to local tennis courts may be inconvenienced by longer wait times to play, however, the inventory of tennis courts throughout the region, especially in the South Valley, is enough to support the shift in use to other facilities. Therefore, impacts would be less-than-significant with regards to removal of the 16 tennis courts and effect on other tennis facilities.

(2) *Demand on Recreation and Park Facilities*

The proposed Project is estimated to have a resident population of 340 residents⁹. The increase in residential population would increase demand for parks and recreational facilities serving the Studio City area.

The Project would be located in an area of Studio City that is served by five parks that are within a two-mile radius of the Project Site. According to the City of Los Angeles General Plan, neighborhood and community recreational facilities should be provided at a minimum of 2 acres per 1,000 persons. With an estimated population of 340 residents, under this standard, the Project would create a demand for 0.68 acres of neighborhood parkland or community recreational facilities. This demand would be considered non-substantial and negligible in comparison to the current amount of parks and recreational facilities currently provided in the community, including the Weddington Golf Course facilities, which will be retained on the Project Site, adjacent to the senior housing. Further, the restricted demographics of the Project residents (i.e., senior citizens) may result in less demand for active recreational facilities than would be the case for non-senior housing. As such, the demand from Project residents would not require

⁹ Project residential population based on a factor of 1.70 persons per household. See Section 4-I, Population and Housing, for discussion.

construction of new recreational facilities and would not burden existing recreational facilities with new population that cannot be accommodated. Therefore, the Project would result in a less-than-significant impact related to demand on existing recreation and park facilities.

The Project would also include recreational and open space facilities within its design. These recreational and open space facilities would further offset the demand by Project residents on citywide recreation and park services.

In particular, Project Design Features would include a pool/lounge area within the common area plaza, approximately 30,000 square feet of indoor common-use activity center, a public children's playground, and private balconies and patios in some of the residential units. The outdoor landscaped areas will be designed as an extension of the indoor living spaces by creating an atmosphere for active use, exercise, socializing, and coordinated events, and thus would function predominately as a common recreational area. Common landscape and hardscape area (inclusive of the pool and children's playground), totaling 109,176 square feet, would be provided.

When considered on a one-for-one basis, the proposed Project would incorporate the equivalent of 3.19 acres of area within proposed Lot 2 for common recreational uses. This represents almost four times the 0.68-acre demand for parkland calculated for the Project.

In addition (as mentioned above), and not part of the above calculation, the Project would retain the Weddington Golf Course essentially unchanged on the Project Site, inclusive of the existing 9-hole pitch-and-putt golf course, driving range, and clubhouse. The golf course would offer additional recreational opportunities for the SCSLC Project, continuing to serve the public as well as the new Project residents. It is anticipated that this facility would continue to be privately owned and made available for public use on a fee basis. Although the Project would not include any permanent commitment to preserve the golf course, the initial lot subdivision would allow for the golf course facilities and proposed Lot 1 to be managed and operated independently from the Studio City Senior Living Center.

(3) *Consistency with Adopted Plans and Policies*

The Project is consistent with the objectives and policies of the Community Plan, which encourage a balance of open space and adequate recreational area to meet resident needs.

The Project will be developed within proposed Lot 2 on the Project Site, which would require removal of 16 tennis courts and a tennis house. However, the Project will be developed adjacent to existing recreational uses on the Project Site, including approximately 11.6 acres of golf course, driving range, putting green, and clubhouse uses that will be available for use by the Project residents. It is anticipated that this facility would continue to be privately owned and made available for public use on a fee basis. The golf course would continue to serve as a prominent recreational facility within the Community Plan Area and would remain as a designated open space amenity for both the community and the Project residents. These existing recreational uses in combination with other existing recreational uses in the community would be able to accommodate the new Project residents. As such, the Project would not conflict with nor

impede the objectives or policies of the Community Plan, resulting in a less-than-significant impact related to consistency with adopted Plans and policies.

Furthermore, within the Studio City Senior Living Center development, 109,176 square feet (approximately 2.5 acres) of outdoor plaza area, which would include a pool, outdoor seating areas, and children's playground, would be provided. Although existing active-use recreational facilities (i.e., the tennis courts) would be lost, they would be replaced with both active and passive recreational facilities within the Project that are suitable for the specific resident population and are compatible with the senior residential use. Additionally, the site layout would include pedestrian access that would allow Project residents to access the Los Angeles River area.

d. Cumulative Impacts

With an estimated 340 residents, the Project would generate the need for 0.68 acres of parkland or recreational uses. The Related Projects would increase the population of the area by approximately 1,455 persons¹⁰ and would require an estimated demand for 2.91 acres of park or recreation area. The 0.68 acres of parkland demand for the Project represents 18.9 % (percent) of the total demand identified for the proposed Project and Related Projects, combined. However, because the Project would incorporate retention of the existing recreational uses on the Project Site as well as Project Design Features that are expected to entirely offset the Project's recreational needs/demand, the incremental increase to cumulative demand would be negligible. Therefore, the Project would not cumulatively contribute to the need for parkland and recreational facilities. To offset their respective impacts, each Related Project would be required to dedicate the required parkland, develop the recreational facilities, or pay in-lieu fees to satisfy the demand for parks and recreational services. With implementation of such Project Design Features or payment of in-lieu fees, cumulative impacts to parkland and recreational facilities would not be considerable.

4. COMPLIANCE MEASURES, PDFS, AND MITIGATION PROGRAM

a. Compliance Measures

The following Compliance Measures are reasonably anticipated standard conditions that are based on local, State, and federal regulations or laws that serve to offset or prevent specific recreational impacts. These Compliance Measures are applicable to the proposed Project and shall be incorporated to ensure that the Project has minimal impacts to surrounding uses:

- In accordance with LAMC Section 17.12, the Applicant shall implement one of the following: 1) dedicate parkland to meet the requirements of the City of Los Angeles General Plan and Los Angeles Municipal Code; 2) pay in-lieu fees for

¹⁰ The number of residential dwelling units produced by the Related Projects can be found in *Table III-1: List of Related Projects* of this Draft EIR. The rates used to determine the number of residents that would be produced from the Related Projects can be found in the table *Plan Population and Dwelling Unit Capacity*, Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, City of Los Angeles General Plan, p. III-2.

any land dedication requirement shortfall; or, 3) provide onsite improvements equivalent in value to the in-lieu fees for recreation and parks facility credit.

b. Project Design Features (PDFs)

The following PDFs are specific design and/or operational characteristics included to avoid or reduce potential recreational impacts.

PDF REC-1: The Project shall include 109,176 square feet of outdoor landscape and hardscape area. The outdoor landscaped area shall be designed as an extension of the indoor living space by creating an atmosphere for active use, exercise, socializing, and coordinated events. The common area plaza connecting the six senior living center buildings shall function predominately as a common recreational area. The plaza area shall include a pool, outdoor lounge area, and a public children's playground.

PDF REC-2: The Project shall include approximately 30,000 square feet of indoor common-use activity center area. These areas shall be used for exercise areas, craft rooms, organized social activities and similar recreational uses for the residents and their guests.

PDF REC-3: The Project shall include private balconies and small patios in some of the residential units that offer opportunities for private open space and recreation use.

PDF REC-4: The Project shall be designed to retain the golf course, driving range, and clubhouse currently on the Project Site, largely unchanged. Minor reconfiguration and modification are permitted. It is anticipated that these facilities shall continue to be privately-owned and made available for use by the public or the adjacent Project residents on a fee basis.

c. Mitigation Measures

In compliance with the required Compliance Measures, the Project will result in less-than-significant recreational impacts. Further, with implementation of Project Design Features, impacts will be further reduced. Therefore, no Mitigation Measures shall be required.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of the above discussed Project Design Features and Compliance Measures, the Project impacts to park and recreational facilities would be less-than-significant.