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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### M. RECREATION

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#### ENVIRONMENTAL SETTING

The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. The LADRP operates and maintains 15,710 acres of parkland with 390 parks, nine lakes, 176 recreation centers, 372 children's play areas, 13 golf courses, 287 tennis courts, 9 dog parks, 59 swimming pools, and 7 skate parks, including those in the project vicinity.<sup>1</sup> However, nearly 13,000 acres of parkland are located in Regional Parks, which are not distributed evenly across all areas of the City.

#### City of Los Angeles Parks

Table IV.M-1, below, includes City of Los Angeles parks and recreational facilities and parks that are located within an approximate two-mile radius of the project site (see also Figure IV.M-1 for park locations).

**Table IV.M-1  
Parks and Recreational Facilities Serving the Project Site**

Facility	Location	Size (acres)	Type
Fehlhaber-houk Park	9521 Tujunga Canyon Road	1.20	Neighborhood
Haines Canyon Park	7021 Arma Avenue	37.51	Community
Little Landers Park	10110 Commerce Avenue	1.16	Neighborhood
McGroarty Cultural Art Center	7570 McGroarty Terrace	16.16	Community
Pasko Park (included)		1.01	Neighborhood

*Source: Written correspondence from Michael Shull, Superintendent, Planning and Development, Los Angeles Department of Recreation and Parks, February 15, 2008.*

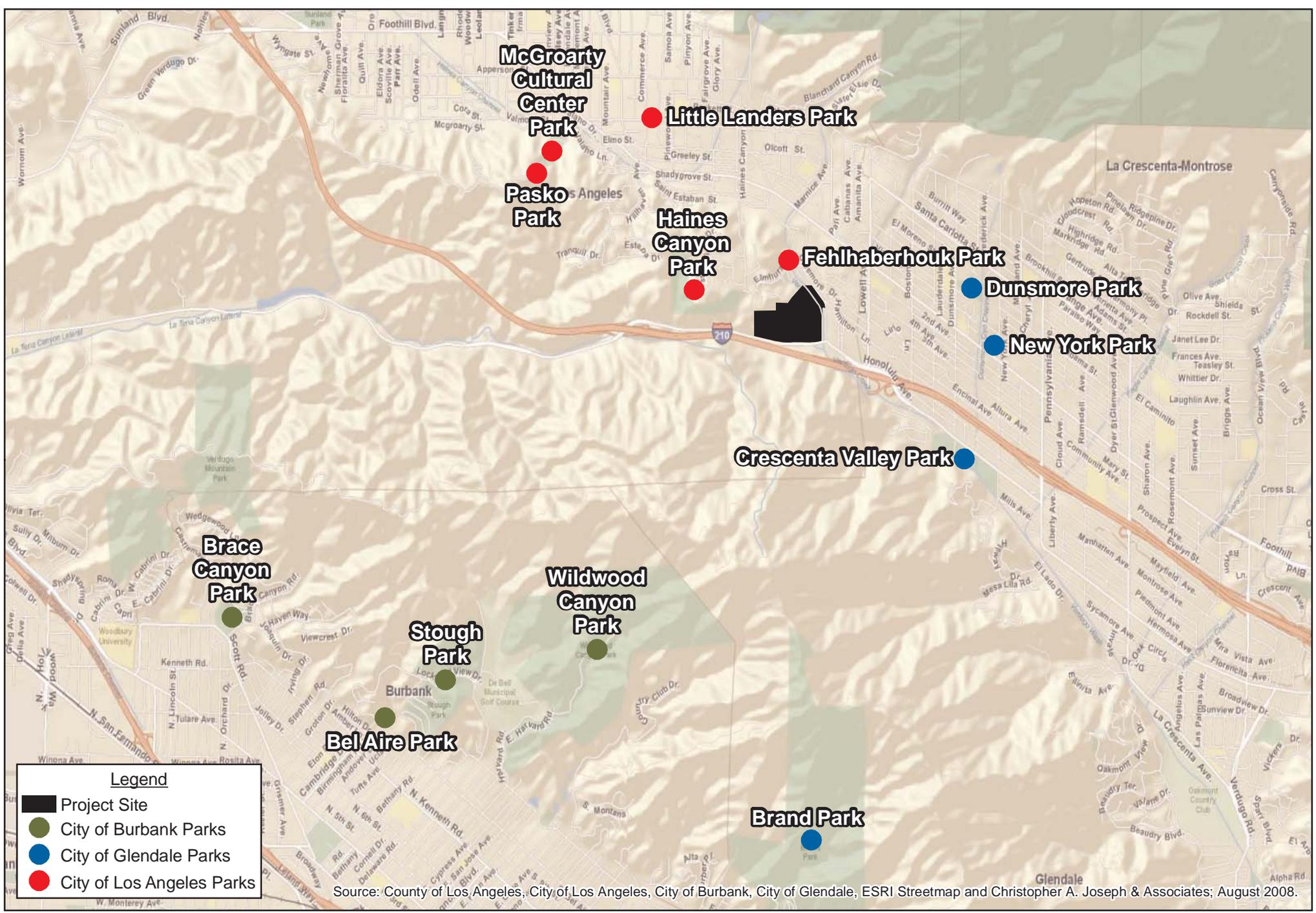
#### Other City Parks

The project site is located near the border of two other cities, Glendale and Burbank, each of which operates several parks that could serve the residents of the proposed project. The City of Glendale Parks, Recreation, and Community Service department operates the following parks near the project site:

- Dunsmore Park, located at 4700 Dunsmore Avenue, is a 9.8 acre park with a Ballfield, Children's Play Area, Community Building, Picnic Area, Tennis Courts, and Wading Pool;

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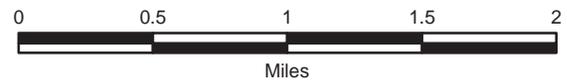
<sup>1</sup> Los Angeles Department of Recreation and Parks: <http://www.laparks.org/dept.htm>, January 25, 2008.



**Legend**

-  Project Site
-  City of Burbank Parks
-  City of Glendale Parks
-  City of Los Angeles Parks

Source: County of Los Angeles, City of Los Angeles, City of Burbank, City of Glendale, ESRI Streetmap and Christopher A. Joseph & Associates; August 2008.



**Figure IV.M-1**  
**Park Locations**

- New York Park, located 4525 New York Avenue, is a 1.9 acre park with a Basketball Court, Children's Play Area, and Picnic Areas;
- Brand Park, located at 1601 West Mountain Street, is a 31 acre park with Hiking, Biking Trails, Basketball Court, Softball Field, Picnic Areas, Children's Playground, and Wading Pool; and
- Crescent Valley Park is located at 3901 Dunsmore Avenue.<sup>2</sup>

The City of Burbank Parks, Recreation, and Community Service department operates the following parks:

- Wildwood Canyon Park, located at 1701 Wildwood Canyon Drive, offers a two-mile trail system along the Burbank side of the Verdugo Mountains;
- Stough Canyon Park, located at 1335 Lockheed View Drive, includes small hiking trails and the Nature Center exhibit about the natural history of the area and its plant life;
- Bel Aire Park, located at 1750 North Bel Aire Drive, is a small residential park; and
- Brace Canyon Park, located 2901 Haven Way, includes two fields and a picnic area.<sup>3</sup>

### **Other Parks and Recreational Facilities**

In addition to city parks, other federal, state, and privately owned parks and recreational facilities provide recreational opportunities for the public in the vicinity of the project site, including Angeles National Forest, La Tuna Canyon Park, and Verdugo Mountains State Park. In addition, there are several golf course facilities in the area that could absorb the loss of the Verdugo Hills Golf Course. The following discussion provides an overview of these additional parks and recreational facilities.

#### ***Angeles National Forest***

The Angeles National Forest, located approximately 1.5 miles north of the project site, encompasses approximately 650,000 acres<sup>4</sup> of diverse terrain, and provides recreational opportunities for residents throughout Southern California. Angeles National Forest offers over 110 camping and picnicking sites, 500 miles of hiking trails, and opportunities for fishing, hunting and target shooting, off-highway vehicle exploration, water sports, and winter sports.<sup>5</sup>

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<sup>2</sup> *City of Glendale Parks, Recreation and Community Service website: [http://www.ci.glendale.ca.us/parks/facilities\\_parks\\_historic-sites.asp](http://www.ci.glendale.ca.us/parks/facilities_parks_historic-sites.asp), March 24, 2008.*

<sup>3</sup> *City of Burbank Parks and Facilities website: <http://www.burbankwire.com/hotlinks/parks.shtml>, June 4, 2008.*

<sup>4</sup> *Angeles National Forest, About Us website: [www.fs.fed.us/r5/angeles/about/](http://www.fs.fed.us/r5/angeles/about/), March 24, 2008.*

<sup>5</sup> *Angeles National Forest, Recreational Activities website: [www.fs.fed.us/r5/angeles/recreation/](http://www.fs.fed.us/r5/angeles/recreation/), March 24, 2008.*

### ***La Tuna Canyon Park***

La Tuna Canyon Park, located southwest of the project site at 8000 La Tuna Canyon Road, is a 1,100-acre park on the north slope of the Verdugo Mountains. La Tuna Canyon Park is owned by the Santa Monica Mountains Conservancy and is operated by the Mountain Recreation and Conservation Authority. Access to La Tuna Canyon Park is via the La Tuna Canyon Trail which begins at La Tuna Canyon Road and ascends to the Verdugo Fire Road. The park features picnic areas, hiking and bicycle trails, and equestrian access.<sup>6</sup>

### ***Verdugo Mountains State Park***

Verdugo Mountains State Park, located approximately 3.5 miles southwest of the project site, is a California State Park that was set aside for the purpose of preserving and protecting a remnant of undeveloped land amidst the urban development of the City of Glendale and surrounding communities. It is operated by the City of Glendale and features vistas toward the main range.<sup>7</sup>

### ***Golf Course Facilities***

With the loss of the Verdugo Hills Golf Course, many residents and area golfers have the opportunity to visit the other golf facilities near the project site. These locations and their amenities are summarized in Table IV.M-2 below (see also Figure IV.M-2 for golf course locations).

There are several other parks and recreational facilities within close distance to the project site. Within 6 miles, there are 6 golf course facilities, with most offering a driving range as well. With the loss of the Verdugo Hills Golf Course, most area golfers will patronize the 12 other golf course. Spread out over the geographic region of Glendale, Burbank, and other cities and communities, it can be assumed that these golf courses would be able to accommodate the displaced golfers.

## **REGULATORY FRAMEWORK**

### **Quimby Act**

Section 66477 of the California Government Code, also known as the Quimby Act, was enacted in an effort to promote the availability of park and open space areas in response to California's rapid urbanization and decrease in the number of parks and recreational facilities. Under the Quimby Act, requirements for dedications of land are not to exceed five acres of parkland per 1,000 persons residing within a subdivision, and in-lieu fee payments shall not exceed the proportionate amount necessary to

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<sup>6</sup> Santa Monica Mountains Conservancy website: <http://www.lamountains.com/parks.asp?parkid=26>, March 24, 2008.

<sup>7</sup> California State Parks, Verdugo Mountains website: [http://www.parks.ca.gov/default.asp?page\\_id=635](http://www.parks.ca.gov/default.asp?page_id=635), March 24, 2008.

provide three acres of parkland, unless the amount of existing neighborhood and community parkland exceeds that limit. If the parkland standard is not exceeded in a project area, cities may request a minimum exaction for the proposed project under the Quimby Act of three acres of parkland per 1,000 persons, and up to five acres per 1,000 if that city currently has five acres of parkland per thousand residences. The City of Los Angeles relies on four acres per 1,000 persons standard. The Quimby Act also authorizes cities and counties to enact ordinances requiring the dedication of land, or the payment of fees for park and/or recreational facilities in lieu thereof, or both, by developers of residential subdivisions as a condition to the approval of a tentative map or parcel map. Thus, Los Angeles Municipal Code (LAMC) Section 17.12 was authorized pursuant to the Quimby Act. Compliance with the Quimby Act as set forth in Section 17.12 of the LAMC is discussed below.

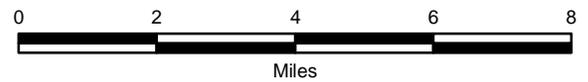
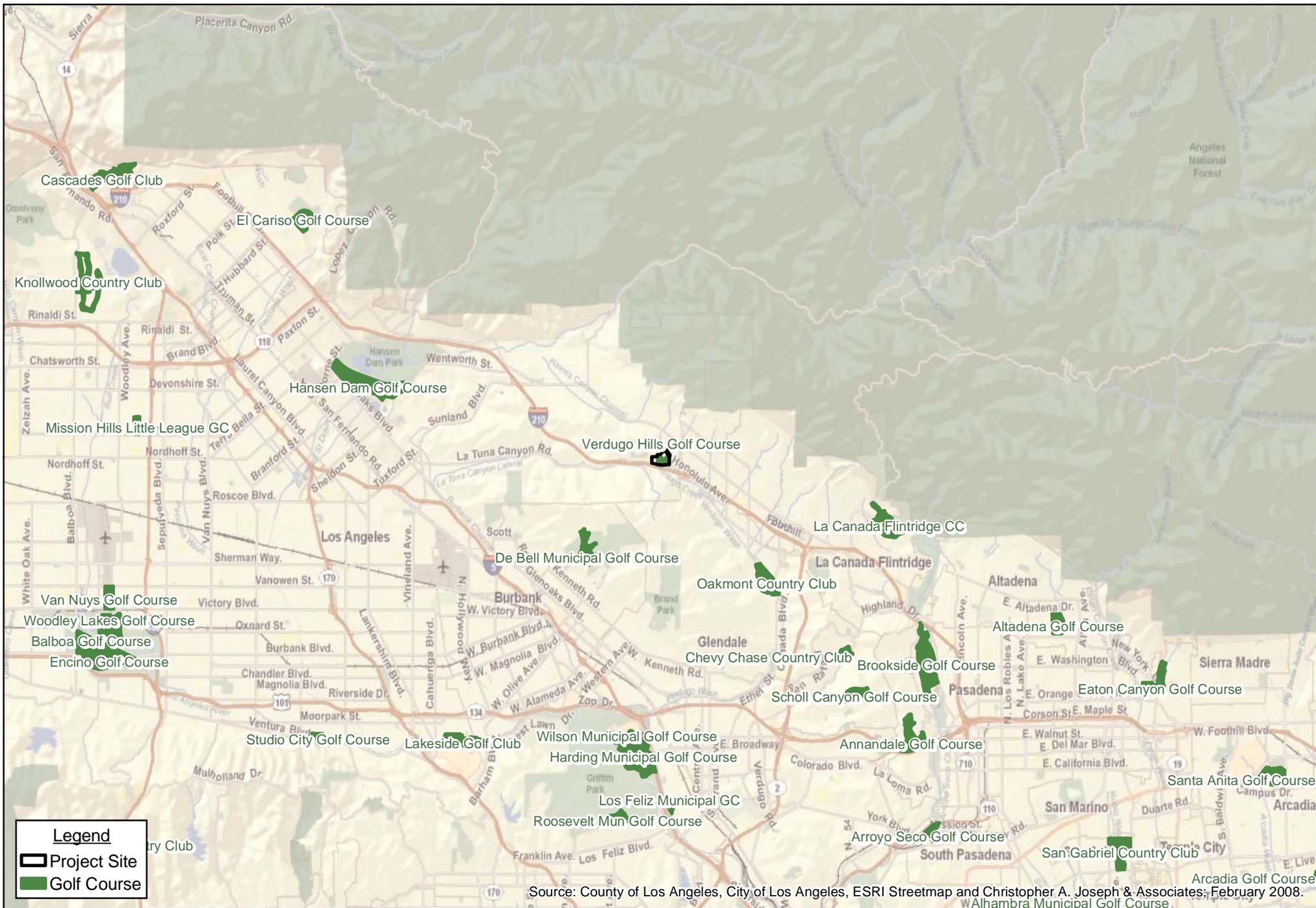
**Table IV.M-2  
Golf Course Facilities Near The Proposed Project**

<b>Facility</b>	<b>Location</b>	<b>Project Distance</b>	<b>Type</b>	<b>Total Holes</b>	<b>Driving Range</b>	<b>Green Fees</b>
DeBell Golf Course	1500 East Walnut Ave.	2.2 miles	Public	27	Yes	\$26-43
Oakmont Country Club	3100 Country Club Dr.	3.0 miles	Private	18	Yes	\$73-83
La Canada Flintridge Club	5500 Godbey Dr.	4.7 miles	Private	18	--	\$20-49
Chevy Chase Country Club	3067 East Chevy Chase Dr.	5.6 miles	Private	18	--	\$20-49
Hansen Dam Golf Course	10400 Glenoaks Blvd.	5.8 miles	Public	18	Yes	\$25-41
Harding and Wilson Municipal Golf Course	4900 Crystal Springs Dr.	6.0 miles	Public	36	Yes	\$21-41
Scholl Canyon Golf Course	3800 East Glenoaks Blvd.	6.4 miles	Public	18	--	\$20-49
Brookside Golf Course	1133 Rosemont Ave.	6.8 miles	Public	36	Yes	\$37-64
Los Feliz Golf Course	3208 Los Feliz Blvd.	7.4 miles	Public	9	Yes	\$4-5
Annandale Golf Club	1 North San Rafael Ave.	7.7 miles	Private	18	Yes	\$70
Roosevelt Golf Course	2650 North Vermont Ave.	7.8 miles	Public	9	Yes	\$12-15
Altadena Golf Course	1456 East Mendocino St.	9.3 miles	Public	9	Yes	\$12-23

*Notes: -- = unknown*  
*Source: TheGolfCourses.net website: <http://www.thegolfcourses.net/>, March 18, 2008.*

### **City of Los Angeles General Plan**

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



Within the City's General Plan, the Public Recreation Plan (PRP) establishes policies and standards related to parks, recreation facilities, and open space areas in the City. The PRP provides Citywide goals, objectives, and recommendations concerning parks and recreation facilities. In addition to the standards established in the PRP, park and open space requirements pursuant to the Quimby Act are also set forth in Sections 17.12 of the LAMC. The following provides information regarding both the PRP and applicable LAMC standards and requirements

### **The Public Recreation Plan**

The Public Recreation Plan, a portion of the Public Facilities and Service Systems Element of the City's General Plan, categorizes parks into three groups: neighborhood, community, and regional. Ideally, neighborhood parks are five to 10 acres in size, have a service radius of approximately one-half mile, and are pedestrian-accessible without crossing a major arterial street or highway/freeway. Community parks are ideally 15 to 20 acres, have a service radius of two miles, and are easily accessible to the area served. Regional parks in the City are ideally greater than 50 acres, provide specialized recreational facilities and/or attractions, and have a service radius encompassing the entire Los Angeles region.

The Public Recreation Plan provides standards for the provision of recreational facilities throughout the City and includes Local Recreation Standards. The standard ratio of neighborhood and community parks to population is four acres per 1,000 people. This standard ratio excludes regional parks. Thus, with a citywide neighborhood and community parkland inventory of about 2,710 acres<sup>8</sup>, the citywide parkland ratio of neighborhood and community parks to population is 0.76 acres per 1,000 persons. This ratio falls far below the standard established in the Public Recreation Plan.

The Sunland-Tujunga-Shadow Hills-Lakeview Terrace-East La Tuna Canyon Community Plan (Community Plan) area had a population of approximately 62,450 residents in 2006,<sup>9</sup> and a neighborhood and community parkland ratio of 0.86 acres per 1,000 people for an inventory of about 54 acres.<sup>10</sup> Therefore, the Community Plan area provides less than the 250 acres of neighborhood and community parkland required utilizing the City's standard of 4 acres of neighborhood and community parkland per 1,000 residents (62,450 x 4/1,000).

The project site is located within a relatively suburban area of the city that falls below the standard for neighborhood and community park acreage. The Community Plan has a ratio of 0.86 acres per 1,000 people and the City of Los Angeles has a ratio of 0.76 acres per 1,000 people. While the area ratio of parkland is higher than the city average, both still fall well below the city standard of 4 acres/1,000

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<sup>8</sup> 15,710 acres parkland-13,000 regional parks = 2,710 acres

<sup>9</sup> Sunland-Tujunga-Shadow Hills-Lakeview Terrace-East La Tuna Canyon Community Plan area estimated 2006 Census population from City of Los Angeles General Plan.

<sup>10</sup> Written correspondence from Michael Shull, Superintendent, Planning and Development, Los Angeles Department of Recreation and Parks, February 15, 2008.

people. The facilities in this area with active recreational features are heavily used and an increase in population would further strain those facilities.<sup>11</sup>

### **City of Los Angeles Municipal Code (LAMC)**

Pursuant to Section 10.21.3 of the Los Angeles Municipal Code (LAMC), the City of Los Angeles imposes a mandatory dwelling unit construction tax to reduce impacts upon park and recreational facilities. The tax collected pursuant to this ordinance is required to be placed in a “Park and Recreational Sites and Facilities Fund,” to be exclusively for the acquisition and development of park and recreational sites and facilities. Any future residential development on the project site, including the proposed project, would be subject to this tax.

Section 17.12 of the LAMC, authorized under the Quimby Act, which requires developers to set aside land for park and recreational purposes, donate conservation elements, and/or pay fees for park improvements, provides standards for parkland acreage requirements and identifies fees per unit. The area of land within a subdivision that is required to be dedicated for park and recreation uses is determined by the maximum density permitted by the zone within which the site is located. As the proposed project is requesting a zone change to RD5-1, it is permitted to be developed to a maximum density of over 8.7 dwelling units per acre (for the 28 developable acres). Thus, based on the proposed project density of 8.2 dwelling units per acre (for the 28 developable acres), approximately 1.74 acres (75,650 Sq. Ft.) would be required to be dedicated as parkland.

If a developer fails to meet the full dedication requirement, fees for park improvements may be paid to the Department of Recreation and Parks (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 based on the proposed zoning of the project. Currently, the fee for the C2 zone is set at \$3,500 per dwelling unit constructed.<sup>12</sup> The Quimby fees are used to acquire necessary land and/or develop new neighborhood and community parks or recreational facilities, which would reasonably serve each residential project.

Section 17.12 of the LAMC allows recreation areas developed within a project site for use by the particular 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 of the residents of a project;

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<sup>11</sup> *Ibid.*

<sup>12</sup> *City of Los Angeles Department of City Planning, memo, February 6, 2009.*

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.

## **ENVIRONMENTAL IMPACTS**

### **Thresholds of Significance**

In accordance with Appendix G to the State CEQA Guidelines, a significant impact would occur if a project would:

- (a) Result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives of the parks department;
- (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; or
- (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 the following factors:

- (a) The net population increase resulting from the proposed project;
- (b) 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 (i.e., renovation, expansion, or addition) and the project's proportional contribution to the demand; and
- (c) Whether the project includes features that would reduce the demand for recreation and park services (e.g., onsite recreation facilities, land dedication or direct financial support to the Department of Recreation and Parks).

### **Project Impacts**

#### **Public Recreation Plan (PRP)**

As discussed above, the PRP's desired long-range Citywide standard for local parks is two acres per 1,000 persons for neighborhood parks and two acres per 1,000 persons for 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 acre per 1,000 persons

for neighborhood parks and one acre per 1,000 persons for community parks.<sup>13</sup> Additionally, the State's Quimby Act allows a local jurisdiction to require a subdivision to provide a maximum of five acres per 1,000 persons in land dedication or fees, unless that particular jurisdiction is already exceeding that ratio.

Currently, Citywide park space is provided at an estimated rate of 0.70 acre per 1,000 residents, while the Community Plan has a ratio of 0.86 acres per 1,000 people.<sup>14</sup> Therefore, the City meets neither the PRP's desired short- nor intermediate-range or long-range standards.

Based on the preferred parkland per population ratio of four acres per 1,000 persons, the 577 new residents<sup>15</sup> of the proposed project would generate a demand of an additional 2.3 acres of new parkland. However, no onsite parkland is proposed and no onsite recreational facilities would be provided as amenities for the new residents. Therefore, of necessity, project residents would seek offsite active recreational facilities in the surrounding community which is currently underserved by parks and recreational facilities. According to the LADRP, this additional demand for public recreational facilities generated by the proposed project would impact existing parks and recreational facilities.<sup>16</sup> The parks and recreational facilities needs of the additional residents, particularly regarding facilities for children and youth, would not be fully met by existing City facilities and, thus, new parks and recreational facilities would be needed with development of the proposed project.

Although additional parks and recreational opportunities are provided by non-City parks (i.e., Angeles National Forest, La Tuna Canyon Park, and Verdugo Mountains State Park), without onsite active recreational opportunities, there would be a local deficiency of active recreational opportunities for children and youth at the project site. While the development would set aside approximately 30.3 acres of open space, this area is fairly steep (with slope gradients of 15% and more) and it is covered by dense native vegetation. Hence, this open space dedication is not suitable for recreational purposes and does not address the local deficiency of active recreational facilities.

To the extent the 30.3 acre dedication of open space does not satisfy the requirements of the Quimby Act, the project developer would be required to pay Quimby fees to the City to satisfy the balance of its obligations under the Quimby Act. The payment of Quimby Fees would assist in funding capital improvement projects, upgrades to existing recreational facilities, and acquisition and development of new park and recreation facilities in the greater project vicinity. However, according to the LADRP,

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<sup>13</sup> *City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan. Approved October 9, 1980.*

<sup>14</sup> *Op. cit.*

<sup>15</sup> *Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon Community Plan, Average Household Sizes (Owner Households) = 2.52 persons per unit x 229 units = 577 persons*

<sup>16</sup> *Written correspondence from Michael Shull, Superintendent, Planning and Development, Los Angeles Department of Recreation and Parks, February 15, 2008.*

payment of Quimby Fees would not eliminate the proposed project's impact on parks and recreational facilities.<sup>17</sup>

Furthermore, the payment of Quimby Fees to fund new nearby facilities would not mitigate the loss of the Verdugo Hills Golf Course for the community. For many decades, the golf course has served the community's recreational needs in a park-poor area. While there are other golf courses in northeastern Los Angeles, there are none like the Verdugo Hills Golf Course. Not only is it a par-three course, which makes it more community friendly, it is also relatively inexpensive to play there. Also, it is available for evening and night play, and is considered a safe place where children can go to learn to play golf. While it can be assumed that some golfers would transition to the other nearby golf courses, it would not be convenient or practical for everyone. Also, as the project would shift recreation users to other existing recreational venues, those facilities would become more crowded and physical deterioration at those facilities could be accelerated. The addition of homes and increased residents in an area that is already below the LADRP standard for parkland acres, would further the impact on existing facilities. For these reasons, the impact of the proposed project on parks and recreational facilities is considered significant.

#### **City of Los Angeles Municipal Code (LAMC)**

As previously stated, Section 17.12 of the LAMC, the City's parkland dedication ordinance enacted under the Quimby Act, provides a formula for satisfying park and recreational uses through parkland dedication and/or the payment of in-lieu fees. For the project's proposed density of 8.2 dwelling units per acre (for the 28 developable acres) approximately 6.2 percent of the gross subdivision area would be required to be dedicated as parkland. Based on this formula and the gross lot area of 28 acres, the project would be required to do one of the following: dedicate approximately 1.74 acres (75,650 Sq. Ft.) of park and recreation space, or pay in-lieu fees of \$4,332 per dwelling unit.<sup>18</sup>

The project would likely increase demand for existing community parks, particularly recreation facilities oriented toward children and impacts relative to the PRP could be significant prior to mitigation. Implementation of Mitigation Measure M-1 below would ensure that the intent of the PRP's parkland standards would be met through the dedication of parkland, payment of in-lieu fees, provision of on-site recreational amenities and open space areas, or through a combination of these methods. Therefore, impacts relative to compliance with Section 17.12, the implementing ordinance of the Quimby Act, would be less than significant with implementation of Mitigation Measure M-1.

In conclusion, the project would meet the requirements set forth in Section 12.21 of the LAMC, and could be found to meet the parkland dedication requirements of Section 17.12 of the LAMC. However as stated above, the project would likely increase demand for existing community parks, particularly recreation

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<sup>17</sup> *Ibid.*

<sup>18</sup> *Based on the revised fees in accordance with Section 12.12H of the LAMC, effective March 1<sup>st</sup>, 2009, and the fee requirement for per acre density permitted in the R4 zone.*

facilities oriented toward children and impacts relative to the PRP could be significant prior to mitigation. Implementation of Mitigation Measure M-1 below would ensure that the intent of the PRP's parkland standards would be met through the dedication of parkland, payment of in-lieu fees, provision of on-site recreational amenities and open space areas, or through a combination of these methods. Furthermore, implementation of the Mitigation Measure M-1 would ensure that the project would comply with the parks and recreational requirements set forth by the LAMC.

## CUMULATIVE IMPACTS

Development of the proposed project in combination with the 28 related projects would result in an increase in employees and residents in the project area. One includes recreational facilities (a 3 acre equestrian park in No. 3) and five consist of commercial, office, or religious uses (Nos. 1, 2, 4, 24, and 27). Employees generated by the commercial components of the related projects would not be expected to use local park or recreational facilities to any great extent since they would not typically have long periods of time during the workday to visit parks and recreational facilities. However, the increase in the residential population by the proposed project in combination with the related projects in the vicinity would further exacerbate the existing parkland deficiency in the project site vicinity. The residential related projects total 481 dwelling units, with about half single-family and half multi-family units. This would generate about 1,571 new residents (see Section IV.M, Population and Housing) and generate the demand for an estimated 6.28 acres of parkland, according to the city standard of 4 acres/1,000 residents. Combined with the proposed project, there would be a cumulative demand for 8.58 acres.

The cumulative demand for 8.58 acres of new parks and recreational facilities in combination with the loss of the Verdugo Hills Golf Course, in a currently underserved area, constitutes a potentially significant impact to parks and recreational facilities. Furthermore, because the project's contribution to this cumulative impact accounts for 27% of the demand for new park space and the elimination of the Verdugo Hills Golf Course, the proposed project's contribution to the impact would be cumulatively considerable. While the satisfaction of the Quimby Act requirements would constitute the project's fair share of mitigation designed to alleviate the cumulative demand for more park space,<sup>19</sup> the loss of the Verdugo Hills Golf Course would remain unmitigated and the cumulative impact would remain significant.

## MITIGATION MEASURES

**M-1** The applicant shall be required to comply with one or more of the following: 1) dedicate two acres of neighborhood parkland and two acres of community parkland per 1,000 residents, 2) pay

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<sup>19</sup> *CEQA Guidelines Section 13130(a)(3) states: "An EIR may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. A project's contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact...."*

in-lieu fees for any land dedication requirement shortfall, or 3) provide on-site improvements equivalent in value of the in-lieu fees, or any portion thereof as required by the Los Angeles Municipal Code Section 17.12.

### **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Despite payment of Quimby Fees, the proposed project would have a significant impact on parks and recreational facilities.