

## **IV. Environmental Impact Analysis**

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### **H.5 Public Services—Parks and Recreation**

#### **1. Introduction**

This section of the Draft EIR addresses the Project's potential impacts on the public parks and recreation facilities administered by the City of Los Angeles Department of Recreation and Parks (RAP). The analysis identifies and describes the existing parks and recreational facilities in the Project Site vicinity and focuses on whether existing parks or facilities are sufficient to accommodate the growth that could be potentially generated by the Project, or if new or physically altered government facilities would be required. This analysis is based, in part, on information provided by the RAP, which is included in Appendix N of this Draft EIR.

#### **2. Environmental Setting**

##### **a. Regulatory Framework**

###### **(1) State Level**

###### *(a) Quimby Act*

Section 66477 of the California Government Code, also known as the Quimby Act, was enacted in 1965 in an effort to promote the availability of park and open space areas in California. The Quimby Act authorizes cities and counties to enact ordinances requiring the dedication of land, or the payment of fees for park and/or recreational facilities in lieu thereof, or both, by developers of residential subdivisions as a condition to the approval of a tentative map or parcel map. Thus, Los Angeles Municipal Code (LAMC) Section 17.12, as further discussed below, was authorized pursuant to the Quimby Act. The Quimby Act permits the City to require parkland dedications not to exceed 3 acres of parkland per 1,000 persons residing within a subdivision, and/or in-lieu fee payments for residential development projects.

###### **(2) Local Level**

###### *(a) City Charter*

The City Charter established the RAP 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. The Board of Recreation and Parks Commissioners oversees the RAP.

With regard 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. However, the Board of Recreation and Parks Commissioners may authorize the use of those lands for any park purpose and for other specified purposes set forth under Section 594(c).

*(b) Los Angeles General Plan Framework Element and Open Space Element*

The City's General Plan Framework Element (adopted in August 2001) includes park and open space policies that address recreational uses throughout the City. Policy 9.23.5 directs the RAP to "re-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." In addition, Policy 9.23.8 instructs the RAP to "prepare 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 Open Space Element was prepared in June 1973 to provide an official guide to the City Planning Commission, the City Council, the Mayor, and other governmental agencies and interested citizens for the identification, preservation, conservation, and acquisition of open space in the City.<sup>1</sup> This document distinguishes open space areas as privately or publicly owned, and includes goals, objectives, policies, and programs directed towards the regulation of privately owned lands both for the benefit of the public as a whole, and for protection of individuals from the misuses of these lands. In addition, this document discusses the acquisition and use of publicly owned lands and recommends further implementation of studies and actions to guide development of open space in the City. Furthermore, in order to address the standards and criteria of identifying open space, this document describes various contextual factors that may affect open space, including, but not limited to: recreation standards; scenic corridors; density and development; cultural or historical sites; safety, health, and social welfare; environmental and ecological balance; and unique sites.<sup>2</sup>

The City's General Plan Open Space Element update was formally initiated pursuant to a Council motion adopted on May 24, 2001 (Council File 96-1358) and has been

<sup>1</sup> City of Los Angeles Planning Department, *Open Space Plan*, June 1973.

<sup>2</sup> City of Los Angeles Planning Department, *Open Space Plan*, June 1973.

undergoing revisions by the Department of City Planning.<sup>3,4</sup> During April through June 2017, the Department of City Planning convened four meetings for an Open Space Working Group for OurLA2040, the City's update to the General Plan. This group included open space practitioners that focused on four topics: Parks and Recreation, Wildlands, Waterways and Beaches, and Connections. As the update to the Open Space Element is underway, key preliminary themes have since been identified:<sup>5</sup>

- Create a network of interconnected urban open spaces and green infrastructure;
- Capitalize on opportunities to repurpose existing land for parks;
- Strategically invest in improving equity and access to parks;
- Promote citizen education, involvement, and stewardship; and
- Identify opportunities for climate-smart open space investments that deliver multiple environmental benefits.

In conjunction with the working group meetings, an Open Space Vision Survey has been released to the public and will provide feedback that will be incorporated into the guiding principles for the Open Space Element. Additional Citywide workshops were held beginning in September and October 2017.<sup>6</sup>

Until approval of the pending updates to the Open Space Element, the RAP 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.<sup>7</sup> The guidelines of the Public Recreation Plan are described below.

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<sup>3</sup> Office of the City Clerk, City of Los Angeles, Council File Number: 96-1358, [https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=vcfi.dsp\\_CFMS\\_Report&rptid=99&cfnumber=96-1358](https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=vcfi.dsp_CFMS_Report&rptid=99&cfnumber=96-1358), accessed January 14, 2020.

<sup>4</sup> City of Los Angeles Planning Department, *General Plan Structure, Summary of the General Plan Structure*, Spring 2014.

<sup>5</sup> City of Los Angeles Planning Department, *OurLA2040, City of Los Angeles' General Plan Update, Open Space Working Group Summary*, August 2017.

<sup>6</sup> City of Los Angeles Planning Department, *OurLA2040 Open Space Working Group Summary*, <http://highlandparknc.com/ourla2040-open-space-working-group-summary/>, accessed January 14, 2020.

<sup>7</sup> Email communication, Melinda M. Gejer, City Planning Associate, Planning, Construction and Maintenance Branch, Department of Recreation and Parks, October 24, 2017.

*(c) Public Recreation Plan*

Originally adopted in 1980 by the City Council and most recently amended in September 2016, the Public Recreation Plan, a component of the City's General Plan, sets forth recreational guidelines intended to provide a basis for satisfying the needs for City recreational sites. The guidelines are not intended to set an upper limit for the areas of parks, recreational sites or other types of open spaces. Instead, they are intended to provide the City with a flexible and broad range of options on how park expenditures can be spent across the City.

The Public Recreation Plan emphasizes neighborhood, community and regional recreational sites and parks because of their importance to the daily lives of the City's people. In addition, the Public Recreation Plan elevates the importance of regional parks as community resources for active and passive recreational activity.

As set forth in the Public Recreation Plan, neighborhood recreational sites and facilities should provide spaces and amenities for outdoor and indoor recreational activities. Such facilities should serve residents of all ages and abilities in the immediate neighborhood and should be based on local community preferences and allow for both active and passive recreation. In accordance with the Public Recreation Plan, community recreational sites and facilities should be designed to serve residents of all ages and abilities in several surrounding neighborhoods and typically offer recreational facilities for organized activities in addition to amenities provided for neighborhood sites and facilities. Regional recreational sites and facilities provide specialized recreational facilities that have regional draw. Finally, the Public Recreation Plan states that school playgrounds may supplement local recreational sites.

The Public Recreation Plan's guidelines state that recreational sites and facilities should be provided at a broad range of levels that collectively help communities reach a recommended overall provision of 10 acres of land per 1,000 persons. In addition, the location and allocation of acreage for neighborhood, community, and regional recreational sites and facilities should be determined by the RAP on the basis of the service radius within residential areas throughout the City. The recommended service levels for both neighborhood sites and facilities and community sites and facilities are 2 acres per 1,000 residents. In addition, the recommended service levels for regional recreational sites and facilities are 6 acres per 1,000 residents. The Public Recreation Plan parkland guidelines are Citywide goals and do not constitute requirements for individual development projects.

The City's programs to implement the Public Recreation Plan include the following:

- Continue to include land acquisition for park and recreational purposes as a regular item in the City's Five Year Capital Improvement Program;
- Prepare a priority schedule based on greatest need for acquiring and developing park and recreational sites;
- Seek federal, state and private funds to implement the acquisition and development of parks and recreational facilities;
- Establish policies to facilitate donation of parks to the City;
- Lease or acquire unused abandoned properties suitable for recreational activities;
- Encourage multiple use of public properties such as power line or flood control rights of way, debris basins, reservoir sites, etc., for recreation; and
- Support programs for community buildings/gymnasiums, swimming pools, and tennis courts.

*(d) Citywide Community Needs Assessment*

In 2009, the RAP 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 parkland, 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.<sup>8</sup> 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 Public Recreation Plan was adopted in 1980. Specifically, 63 percent of survey respondents stated that they would travel at least one mile to visit a neighborhood park and 38 percent of respondents would travel at least 2 miles. Additionally, 71 percent of respondents would travel at least 2 miles to visit a community park and 37 percent of respondents would travel more than 3 miles to visit a community park.<sup>9</sup> 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 Department of City Planning to modify the Park and Recreation Site Acquisition and Development Provisions

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<sup>8</sup> City of Los Angeles Department of Recreation and Parks, *Final Report of the Citywide Community Needs Assessment, 2009*.

<sup>9</sup> City of Los Angeles Department of Recreation and Parks, *Final Report of the Citywide Community Needs Assessment*.

set forth in LAMC Section 17.12 and update the Public Recreation Plan, 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.<sup>10</sup> Following the Assessment, the RAP began the 50 Parks Initiative, which is intended to substantially increase the number of parks and facilities across the City, with a specific focus on densely populated neighborhoods and communities that lack sufficient open space and recreational services.<sup>11</sup> Carlton Way Park, located 0.8 mile east of the Project Site, was developed through the 50 Parks Initiative.<sup>12</sup>

*(e) Los Angeles Municipal Code*

LAMC Section 12.21 G identifies open space requirements for projects, and defines usable open space for the purpose of meeting the requirements. Usable open space is defined as areas designated for active or passive recreation and may consist of private and/or common areas. Common open space areas must be readily accessible to all residents of the site and constitute at least 50 percent of the total required usable open space. Common open space areas can incorporate recreational amenities such as swimming pools, spas, children's play areas, and sitting areas. A minimum of 25 percent of the common open space area must be planted with ground cover, shrubs, or trees. In addition, indoor recreation amenities cannot constitute more than 25 percent of the total required usable open space. Private open space is defined as area which is contiguous to and immediately accessible from an individual dwelling unit and which contains a minimum of 50 square feet, of which no more than 50 square feet per dwelling unit is counted toward the total required usable open space. Private open space may not have a dimension of less than six feet in any direction.

LAMC Section 12.21 G also requires that all residential developments containing six or more dwelling units on a lot provide, at a minimum, the following usable open space area per dwelling unit: 100 square feet for each unit having less than three habitable rooms, 125 square feet for each unit having three habitable rooms, and 175 square feet for each unit having more than three habitable rooms.

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<sup>10</sup> City of Los Angeles Department of Recreation and Parks, *Final Report of the Citywide Community Needs Assessment*.

<sup>11</sup> City of Los Angeles, Department of Recreation and Parks, *50 Parks Initiative*, [www.laparks.org/50parks](http://www.laparks.org/50parks), accessed January 14, 2020.

<sup>12</sup> City of Los Angeles Department of Recreation and Parks, *50 Parks Initiative, Map*, [www.laparks.org/50parks/map](http://www.laparks.org/50parks/map), accessed January 14, 2020.

In September 2016, the City adopted a new Park Fee Ordinance (Ordinance).<sup>13</sup> The aim of the Ordinance is to increase the opportunities for park space creation and expand the Quimby Act fee program beyond those projects requiring a subdivision map to include a park linkage fee for all net new residential units. The Ordinance amends LAMC Sections 12.21, 12.33, 17.03, 17.12 and 17.58, deletes LAMC Sections 17.07 and 19.01, and adds LAMC Section 19.17. The Ordinance increases Quimby Act fees, provides a new impact fee for non-subdivision projects, eliminates the deferral of park fees for market rate projects that include residential units, increases the fee spending radii from the site from which the fee is collected, provides for early City consultation for subdivision projects or projects with over 50 units in order to identify means to dedicate land for park space, and updates the provisions for credits against park fees. The effective date of the Ordinance was January 11, 2017. The Ordinance provides that any project that has acquired vested rights under LAMC Section 12.26 A.3 prior to the effective date of the Ordinance, and/or has an approved vesting tentative map pursuant to LAMC Section 17.15, the application for which has been deemed complete prior to the effect date of the Ordinance, shall not be subject to the park fees set forth in the Ordinance. The Project's entitlement applications and its vesting tentative map application were deemed complete prior to the Ordinance becoming effective.<sup>14</sup> As such, the Project is not subject to the park fee provisions of the Ordinance. Rather, the Project is subject to the provisions that were in effect at the time the Project was deemed complete. These provisions are summarized below.

LAMC Section 17.12, authorized under the Quimby Act, requires developers of residential subdivisions to set aside and dedicate land for park and recreational uses and/or pay in-lieu fees for park improvements. The area of parkland within a subdivision that is required to be dedicated is determined by the maximum density permitted by the zone within which the development is located. Alternately, fees for park improvements may be paid to the RAP 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 zoning of the project site and must be paid prior to the issuance of building permits. These fees are adjusted annually.

Furthermore, LAMC Section 17.12 allows recreation areas developed on a project site that are 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, but are not limited to, swimming pools and spas (when the spas are an integral part of a pool complex) and children's play areas with playground equipment

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<sup>13</sup> *Ordinance No. 184505, approved by City Council on September 7, 2016, signed by the Mayor on September 13, 2016 and published on September 19, 2016.*

<sup>14</sup> *The Project's application was deemed complete by the Department of City Planning on September 12, 2016.*

comparable in type and quality to those found in City parks. The recreational areas proposed as part of a project must also 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 (referred to herein as common open space) may be credited against the project's land dedication requirement if approved by the City's Advisory Agency.

Similar to Section 17.12 described above, LAMC Section 12.33 requires a developer of multiple residential uses, for which a zone change is required, to dedicate land for park and recreational uses and/or pay in-lieu fees for park improvements. These fees (also known as Finn fees), are subject to the same restrictions, conditions, exemptions, and credits under Section 17.12.

In addition, pursuant to LAMC Section 21.10.3(a)(1), 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 (Dwelling Unit Construction Tax). 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. As provided in LAMC Section 21.10.3(b), if a developer has already paid Quimby/Finn fees and/or dedicated parkland or recreational facilities pursuant to Sections 17.12 or 12.33, the required Dwelling Unit Construction Tax is reduced accordingly.

*(f) Hollywood Community Plan*

As discussed in Section IV.F, Land Use, of this Draft EIR, the Project Site is located within the Hollywood Community Plan area. The Hollywood Community Plan, adopted on December 13, 1988, includes the following objectives and policies that are relevant to parks and recreation:

- Objective 5: To provide a basis for the location and programming of public services and utilities and to coordinate the phasing of public facilities with private development. To encourage open space and parks in both local neighborhoods and in high density areas.
- Objective 7: To encourage the preservation of open space consistent with property rights when privately owned and to promote the preservation of views, natural character and topography of mountainous parts of the Community for the enjoyment of both local residents and persons throughout the Los Angeles region.



- Recreation and Parks Policy 1: It is the City's policy that the desires of the local residents be considered in the planning of recreational facilities.
- Recreation and Parks Policy 2: It is the City's policy that recreational facilities, programs and procedures be tailored to the social, economic and cultural characteristics of individual neighborhoods and that these programs and procedures be continually monitored.
- Recreation and Parks Policy 3: It is the City's policy that existing recreational sites and facilities be upgraded through site improvements, rehabilitation and reuse of sound structures, and replacement of obsolete structures, as funds become available.
- Recreation and Parks Policy 4: It is the City's policy that, in the absence of public land, and where feasible, intensified use of existing facilities and joint use of other public facilities for recreational purposes be encouraged.
- Recreation and Parks Policy 5: It is the City's policy that the expansion of existing recreational sites and the acquisition of new sites be planned so as to minimize the displacement of housing and the relocation of residents.

As discussed above, the Public Recreation Plan, a portion of the Service Systems Element of the City's General Plan, sets a goal of achieving of a parkland acres-to-population ratio for neighborhood and community parks of 4 acres per 1,000 residents. The Public Recreation Plan also establishes short- and intermediate-range standards of 1 acre per 1,000 persons within a 1-mile service radius for neighborhood parks and 1 acre per 1,000 persons within a 2-mile service radius for community parks, for a combined standard of 2 acres of neighborhood and community parkland per 1,000 persons.

## **b. Existing Conditions**

### **(1) Local Area**

As previously stated, the RAP is responsible for the establishment, operation, and maintenance of parks and recreational facilities within the City. Currently, the RAP maintains and operates more than 444 sites for recreational use, including 422 playgrounds, 321 tennis courts, 184 recreation centers, 72 fitness areas, 62 swimming pools and aquatic centers, 30 senior centers, 26 skate parks, 13 golf courses, 12 museums, 9 dog parks, 187 summer youth camps, 12 museums, 13 lakes, and hundreds of programs for youth, adults and seniors. The RAP also administers more than

16,000 acres of parkland, which includes Griffith Park, one of the largest municipal parks within the boundaries of any American city.<sup>15</sup>

Consistent with the *L.A. CEQA Thresholds Guide*, potential impacts to city parks and recreational facilities within a 2-mile radius of the Project Site are evaluated.<sup>16</sup> As shown in Figure IV.H.5-1 on page IV.H.5-11, there are a number of parks and recreational facilities located within an approximate 2-mile radius of the Project Site. Table IV.H.5-1 on page IV.H.5-12 lists the size, type of park, amenities, and approximate driving distance from the Project Site for these public parks and recreational facilities.

The Hollywood Community Plan area has an existing neighborhood and community parkland-to-population ratio of 0.41 acres per 1,000 residents, while the City has a parkland-to-population ratio of 0.84 acres per 1,000 residents.<sup>17</sup> Thus, the Hollywood Community Plan area has a lower parkland-to-population ratio compared to the City, and both the Hollywood Community Plan area and the City are underserved when considering the desired parkland standards provided in the Public Recreation Plan. However, the Hollywood Community Plan ratio does not include regional parks, such as Runyon Canyon Park and Griffith Park, which are located within the Hollywood Community Plan area. Runyon Canyon Park, a 130-acre regional park located at the base of the Santa Monica Mountains at a distance of 1.1 miles from the Project Site, provides hiking opportunities and off-leash dog areas.<sup>18</sup> The 4,210-acre Griffith Park, the largest municipal park with urban wilderness area in the United States, offers numerous family attractions, an assortment of educational and cultural institutions, and miles of hiking and horseback riding trails.<sup>19</sup> The nearest entrance to Griffith Park from the Project Site is off of Fern Dell Drive, approximately 1.4 miles northeast of the Project Site.

The City is also investigating the feasibility of constructing a “cap park” over the Hollywood Freeway (US-101). This project, known as Hollywood Central Park, would create a 44-acre park that spans above the Hollywood Freeway between Santa Monica

<sup>15</sup> *Los Angeles Department of Recreation and Parks, Who We Are*, [www.laparks.org/departments/who-we-are](http://www.laparks.org/departments/who-we-are), accessed January 14, 2020.

<sup>16</sup> *The following parks are also within a 2-mile radius but are not administered by the City of Los Angeles: Highland Camrose Park (County of Los Angeles); Plummer Park and Detroit Street Community Garden (City of West Hollywood); and Barnsdall Art Park and Fountain Community Gardens (Privately Funded/Maintained).*

<sup>17</sup> *Written correspondence from Darry Ford, Senior Management Analyst, Department of Recreation and Parks, Planning, Construction and Maintenance Branch, July 25, 2017.*

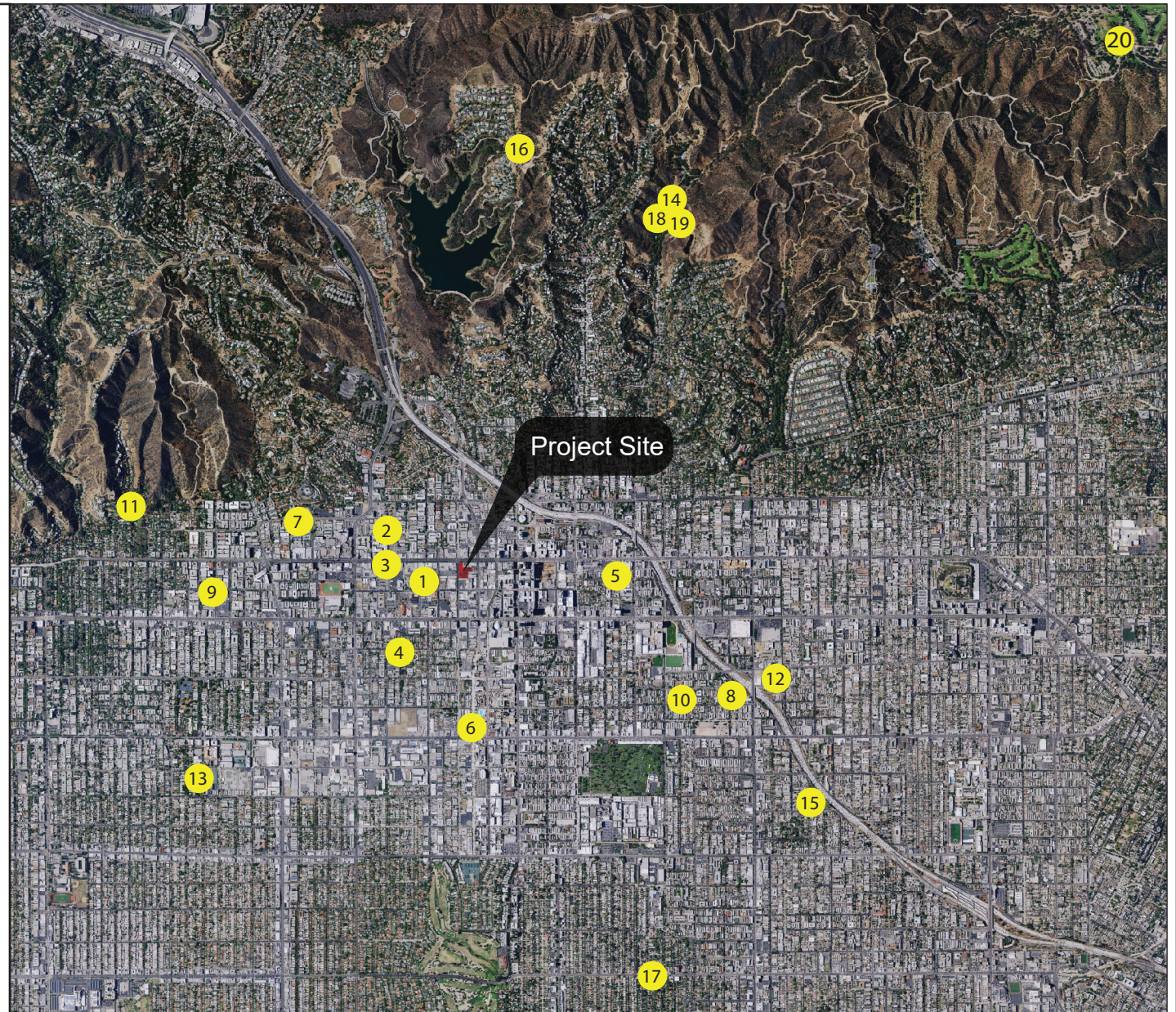
<sup>18</sup> *Hikespeak.com, Runyon Canyon Loops in Runyon Canyon Park*, [www.hikespeak.com/trails/runyon-canyon-hike-hollywood-los-angeles/](http://www.hikespeak.com/trails/runyon-canyon-hike-hollywood-los-angeles/), accessed January 14, 2020.

<sup>19</sup> *City of Los Angeles Department of Recreation and Parks, Griffith Park*, [www.laparks.org/griffithpark/griffith-park-home-page#activities](http://www.laparks.org/griffithpark/griffith-park-home-page#activities), accessed January 14, 2020.



## LEGEND

- 1 **Selma Park**  
6567 Selma Ave., Los Angeles, CA 90028
- 2 **Yucca Park & Community Center**  
6671 Yucca St., Los Angeles, CA 90028
- 3 **Las Palmas Senior Citizen Center**  
1820 Las Palmas Ave., Los Angeles, CA 90028
- 4 **De Longpre Park**  
1350 N. Cherokee Ave., Los Angeles, CA 90028
- 5 **Carlton Way Park**  
5927 Carlton Way, Los Angeles, CA 90028
- 6 **Hollywood Pool & Recreation Center**  
1122 Cole Ave., Los Angeles, CA 90038
- 7 **Dorothy & Benjamin Smith Park**  
7020 Franklin Ave., Los Angeles, CA 90028
- 8 **Lexington Avenue Pocket Park**  
5523 Lexington Ave., Los Angeles, CA 90038
- 9 **Runyon Canyon Park & Dog Park**  
2000 N. Fuller Ave., Los Angeles, CA 90046
- 10 **Seily Rodriguez Park**  
5707 Lexington Ave., Los Angeles, CA 90028
- 11 **Wattles Garden Park**  
1850 N. Curson Ave., Los Angeles, CA 90046
- 12 **La Mirada Park**  
5401 La Mirada Ave., Los Angeles, CA 90029
- 13 **Poinsettia Recreation Center**  
7341 Willoughby Ave., Los Angeles, CA 90046
- 14 **Camp Hollywoodland**  
3200 Canyon Dr., Los Angeles, CA 90068
- 15 **Lemon Grove Recreation Center**  
4959 Lemon Grove Ave., Los Angeles, CA 90029
- 16 **Lake Hollywood Park**  
3160 Canyon Lake Dr., Los Angeles, CA 90068
- 17 **Robert L. Burns Park**  
4900 Beverly Blvd., Los Angeles, CA 90004
- 18 **Bronson Canyon**  
3200 Canyon Rd., Los Angeles, CA 90068
- 19 **Camp Hollywoodland**  
3200 Canyon Dr., Los Angeles, CA 90068
- 20 **Griffith Park**  
4730 Crystal Springs Dr., Los Angeles, CA 90027



**Figure IV.H.5-1**  
Parks and Recreational Facilities in the Vicinity of the Project Site



**Table IV.H.5-1  
City Parks and Recreational Facilities Within a 2-Mile Radius of the Project Site**

<b>Map No.<sup>a</sup></b>	<b>Facility and Address</b>	<b>Distance from Project Site<sup>b</sup> (miles)</b>	<b>Type of Park/ Recreational Facilities<sup>c</sup></b>	<b>Amenities</b>
1	<b>Selma Park</b> 6567 Selma Ave. Los Angeles, CA 90028	0.3	Park	Children's Play Area, Outdoor Fitness Equipment
2	<b>Yucca Park &amp; Community Center</b> 6671 Yucca St. Los Angeles, CA 90028	0.4	Park, Community Center	Youth Sports, After School Club, Computer Lab, Seasonal Camps, Basketball, Soccer
3	<b>Las Palmas Senior Citizen Center</b> 1820 Las Palmas Ave. Los Angeles, CA 90028	0.5	Senior Citizen Center	Community Events, Exercise Programs, Computer Lab, Bingo
4	<b>De Longpre Park</b> 1350 N. Cherokee Ave. Los Angeles, CA 90028	0.7	Park	Children's Play Area, Benches
5	<b>Carlton Way Park</b> 5927 Carlton Way Los Angeles, CA 90028	0.7	Park	Children's Play Area, Fitness Equipment
6	<b>Hollywood Pool &amp; Recreation Center</b> 1122 Cole Ave. Los Angeles, CA 90038	0.8	Pool, Recreation Center	Youth Sports, Arts & Crafts, Cooking, Day Camp, Basketball Courts, Sports Field, Pool
7	<b>Dorothy &amp; Benjamin Smith Park</b> 7020 Franklin Ave. Los Angeles, CA 90028	0.9	Park	Benches, Sitting Area
8	<b>Lexington Avenue Pocket Park</b> 5523 Lexington Ave. Los Angeles, CA 90038	1.2	Park	Soccer Field, Children's Play Area
9	<b>Runyon Canyon Park &amp; Dog Park</b> 2000 N. Fuller Ave. Los Angeles, CA 90046	1.1	Regional Park, Dog Park	Hiking Trail, Dog Park
10	<b>Griffith Park</b> 4730 Crystal Springs Dr. Los Angeles, CA 90027	1.4 <sup>d</sup>	Regional Park	Hiking Trails, Dog Area, Observatory, Zoo, Picnic Areas
11	<b>Seily Rodriguez Park</b> 5707 Lexington Ave. Los Angeles, CA 90028	1.5	Park	Basketball, Children's Play Area, Picnic Tables, Benches
12	<b>Wattles Garden Park</b> 1850 N. Curson Ave. Los Angeles, CA 90046	1.8	Regional Park	Community Garden, Hiking Trail

**Table IV.H.5-1 (Continued)**  
**City Parks and Recreational Facilities Within a 2-Mile Radius of the Project Site**

<b>Map No.<sup>a</sup></b>	<b>Facility and Address</b>	<b>Distance from Project Site<sup>b</sup> (miles)</b>	<b>Type of Park/ Recreational Facilities<sup>c</sup></b>	<b>Amenities</b>
13	<b>La Mirada Park</b> 5401 La Mirada Ave. Los Angeles, CA 90029	1.9	Park	Outdoor Fitness Equipment, Picnic Tables
14	<b>Poinsettia Recreation Center</b> 7341 Willoughby Ave. Los Angeles, CA 90046	2.1	Recreation Center	Baseball, Basketball, Children's Play Area, Sports Leagues, Camps
15	<b>Camp Hollywoodland</b> 3200 Canyon Dr. Los Angeles, CA 90068	2.3	Summer Camp	Children's Summer Camp Facility, Community Room
16	<b>Lemon Grove Recreation Center</b> 4959 Lemon Grove Ave. Los Angeles, CA 90029	2.5	Recreation Center	Youth Sports, After School Club, Arts & Crafts, Music Programs, Baseball, BBQ, Basketball, Picnic Tables
17	<b>Lake Hollywood Park</b> 3160 Canyon Lake Dr. Los Angeles, CA 90068	2.6	Park	Children's Play Area, Picnic Tables, Barbecue Pits
18	<b>Robert L. Burns Park</b> 4900 Beverly Blvd. Los Angeles, CA 90004	2.6	Park	Children's Play Area, Picnic Tables
19	<b>Bronson Canyon</b> 3200 Canyon Rd. Los Angeles, CA 90068	2.6	Regional Park	Picnic Tables, Hiking Trail
20	<b>Camp Hollywoodland</b> 3200 Canyon Dr. Los Angeles, CA 90068	2.6	Summer Camp	Children's Summer Camp Facility, Community Room

<sup>a</sup> Map numbers correspond with Figure IV.H.5-1 on page IV.H.5-11.

<sup>b</sup> Distances represent approximate walking distances from 6430 Hollywood Boulevard as determined by Google Maps.

<sup>c</sup> Facilities greater than 2 miles away from the Project Site are listed for informational purposes as they may draw visitors from outside a two-mile radius.

<sup>d</sup> Griffith Park is over 4,000 acres in size and is accessible at multiple points throughout the City. Distance from Project Site depends on which entrance visitors use. As noted above, the nearest entrance to Griffith Park from the Project Site is off of Fern Dell Drive, approximately 1.4 miles northeast of the Project Site.

Source: City of Los Angeles, Department of Recreation and Parks Facility Locator, [www.laparks.org](http://www.laparks.org), accessed September 29, 2017; Written correspondence from Darryl Ford, Senior Management Analyst, Department of Recreation and Parks, Planning, Construction and Maintenance Branch, July 25, 2017.

Boulevard and Hollywood Boulevard, approximately 0.8 mile east of the Project Site. If constructed, this park would contribute towards meeting the demand for park and recreational space in the Project vicinity. The Hollywood Central Park project is included as a related project for purposes of assessing cumulative impacts throughout this Draft EIR, as noted in Section III, Environmental Setting, of this Draft EIR.

## (2) Project Site

The Project Site is currently occupied by four low-rise commercial buildings that comprise a total of 29,200 square feet of floor area, as well as surface parking. Landscaping within the Project Site is limited. Two ornamental trees are located along Hollywood Boulevard, and two ornamental trees are located within the surface parking lot. There are no parks or recreational facilities located on-site.

# 3. Project Impacts

## a. Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to parks and recreation if it would:

***Threshold (a): Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (i.e., parks), 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?***

***Threshold (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?***

***Threshold (c): Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?***

In assessing impacts related to parks and recreation in this section, the City will use Appendix G as the thresholds of significance. The factors identified below from the *L.A. CEQA Thresholds Guide* will be used where applicable and relevant to assist in analyzing the Appendix G thresholds. Specifically, the *L.A. CEQA Thresholds Guide* states that the determination of significance for impacts to parks and recreation facilities 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 recreational and park services anticipated at the time of project build-out compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand, and;
- Whether the project includes features that would reduce the demand for recreational and park services (e.g., on-site recreation facilities, land dedication or direct financial support to the Department of Recreation and Parks).

## **b. Methodology**

The methodology used to evaluate potential impacts to park and recreation facilities includes the following: (1) reviewing the existing parks and recreational facilities in the Project Site vicinity; (2) projecting the future population associated with the Project; and (3) evaluating the demand for park and recreation service anticipated at the time of Project buildout compared to the expected level of service available, considering both RAP facilities, as well as the Project's recreational amenities. The analysis also considers whether the Project would conflict with the parks and recreation standards set forth in regulatory documents (i.e., the Quimby Act, the LAMC, and the General Plan including the Public Recreation Plan).

## **c. Project Design Features**

### **(1) Project Design Features**

No specific project design features are proposed with regard to parks and recreation.

### **(2) Relevant Project Characteristics**

The Project would provide a variety of open space and recreational amenities. Private open space and recreational amenities would be available to Project residents, such as landscaped courtyards and terraces; a pool, gym, and yoga studio; private balconies; outdoor cooking facilities; and similar amenities. As part of the Project, two on-site trees would be removed, and the two street trees along Hollywood Boulevard would be retained. As discussed further below, the Project would provide 33,750 square feet of open space, which exceeds the 29,150 square feet of open space required by the LAMC.

## d. Analysis of Project Impacts

***Threshold (a): Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities (i.e., parks), 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?***

### (1) Impact Analysis

#### *(a) Public Recreation Plan*

As discussed above, the Public Recreation Plan's recommended long-range standard for local parks for the City is 2 acres per 1,000 persons for neighborhood parks and 2 acres per 1,000 persons for community parks. However, the Public Recreation Plan 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 1 acre per 1,000 persons for neighborhood parks and 1 acre per 1,000 persons for community parks. As stated above, the Hollywood Community Plan Area currently does not meet the Public Recreation Plan's desired short-, intermediate-, or long-range standards. However, as previously indicated, these standards are Citywide goals, not requirements, and are not intended to be used as requirements for individual development projects. In addition, the 2009 Citywide Community Needs Assessment states that since the time that the Public Recreation Plan was adopted in 1980, the distance many people are willing to travel to parks and recreational facilities has increased substantially. Furthermore, the Hollywood Community Plan ratio does not include regional parks, such as Runyon Canyon Park and Griffith Park, which are located within the Hollywood Community Plan Area.

As previously stated, the Public Recreation Plan parkland guidelines are Citywide goals and do not constitute requirements for individual development projects. Based on the estimated 630 residents that would be generated by the Project, the Project would need to provide approximately 1.3 acres of neighborhood parkland to meet the Public Recreation Plan's long-range standard of 2 acres per 1,000 residents and approximately 0.6 acre to meet the Public Recreation Plan's more attainable short- and intermediate-range standard of 1 acre per 1,000 residents. Similarly, the Project would need to provide 1.3 acres of community parkland to meet the Public Recreation Plan's long-range standard for community parks of 2 acres per 1,000 residents and approximately 0.6 acre to meet the Public Recreation Plan's more attainable short- and intermediate-range standard of 1 acre per 1,000 residents.



The Project does not propose any publicly accessible open space or dedication of land for park space. The Project does, however, provide approximately 29,650 square feet (0.68 acre) of common open space, as defined by LAMC Section 12.21 G. Therefore, the Project's 0.68 acre of common open space would fall short of the acreage required to meet the Public Recreation Plan's long-, intermediate-, and short-range standards for neighborhood and community parks. However, due to the Project's inclusion of common open space and recreational opportunities, the use of existing community parks in the area is anticipated to be reduced. Notwithstanding, Project residents would still be expected to utilize neighborhood and community park amenities, including sports fields, tennis courts, basketball courts, and children's play areas. Nonetheless, as previously stated, the Public Recreation Plan parkland standards are Citywide goals and do not constitute requirements for individual development projects.

Furthermore, compliance with regulatory requirements would ensure that the intent of the Public Recreation Plan's parkland standards would be met through compliance with State law as enforced through applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces. Such requirements include the provision of on-site open space, payment of the Dwelling Unit Construction Tax, and with the Project requiring approval of a Tentative Tract Map, as well as a zone change, compliance with the City's Quimby Act requirements through the dedication of parkland, payment of in-lieu fees, or provision of on-site recreational amenities and open space areas, or through a combination of these methods.

*(b) Los Angeles Municipal Code*

As described above, LAMC Section 12.21-G requires that residential developments containing six or more dwelling units on a lot provide a minimum square footage of usable open space per dwelling unit. Based on the proposed dwelling unit types, the Project would be required to provide a total of 29,150 square feet of usable open space, as shown in Table IV.H.5-2 on page IV.H.5-18. The Project would provide a total of 33,750 square feet of usable open space, consisting of common open space (e.g., courtyards, deck, pool, etc.) and private open space (balconies) for its residents. Thus, the Project would meet the LAMC's requirement for the provision of usable open space.

According to LAMC Section 12.21-G, common open space must constitute at least 50 percent of the total required usable open space requirement. Therefore, the Project would be required to provide 14,575 square feet of common open space. The Project would provide 29,650 square feet of common open space, approximately 88 percent of the total usable open space provided. Additionally, per LAMC Section 12.21 G, a minimum of 25 percent of the common open space must be planted with ground cover, shrubs, and trees. Therefore, based on the required 14,575 square feet of common open space, the Project would be required to provide a minimum of 3,644 square feet of landscaped

**Table IV.H.5-2**  
**Section 12.21G LAMC—Open Space Required and Provided by the Project**

Open Space Requirement	Quantity	Requirement per Unit	Total Required
Studio (less than 3 habitable rooms)	20 du	100 sf per du	2,000 sf
1 bed (less than 3 habitable rooms)	140 du	100 sf per du	14,000 sf
2 bed (3 habitable rooms)	87 du	125 sf per du	10,875 sf
3 bed (more than 3 habitable rooms)	13 du	175 sf per du	2,275 sf
Total Open Space Required			29,150 sf
Total Common Open Space Required			14,575 sf
Open Space Proposed	Level	Total Provided	
Open Space Toward Requirement			
Private Open Space (50 sf x 70 du)		3,500 sf	
Internet Cafe	1	700 sf	
Theater	2	950 sf	
Library/Music Room	4	600 sf	
Gym and Yoga Studio	4	2,000 sf	
Pool Deck	4	5,600 sf	
Inner Courtyard	4	4,600 sf	
Sky Deck	12	11,200 sf	
Open Space Subtotal		29,150 sf (0.67 acre)	
Additional Open Space Provided			
Dog Run Deck	2	1,800 sf	
Terraces (50 sf x 12 du)	4	600 sf	
Inner Courtyard – East	4	1,200 sf	
Library Terrace	4	1,000 sf	
Additional Open Space Subtotal		4,600 sf (0.11 acre)	
Total Open Space Provided		33,750 sf (0.77 acre)	
Total Common Open Space		29,650 sf (0.68 acre)	
Total Common Planted Open Space		6,745 sf (0.15 acre)	
<hr/>			
du = dwelling units			
sf = square feet			
Source: GMPA Architects, 2017; Eyestone Environmental, 2020.			

common open space. The Project would provide 6,745 square feet of common planted open space, which is anticipated to reduce demand for community parks near the Project Site.

In addition, LAMC Section 12.21-G generally requires that common open space be open to the sky; however, enclosed recreation rooms of at least 600 square feet or greater may count as common open space but cannot qualify for more than 25 percent of the total required usable open space. The Project would provide a 700-square-foot internet café on Level 1, a 950-square-foot theater on Level 2, a 2,000-square-foot gym and yoga studio on Level 4, and a 600-square-foot library/music room on Level 4. Overall, the enclosed recreation rooms within the Project would constitute a total of 4,250 square feet, or 15 percent of the total usable open space required. Furthermore, LAMC Section 12.21-G allows a maximum of 50 square feet of balcony area to be credited towards the usable open space requirement as private open space. Of the Project's 260 units, 70 residential units would include private balconies that are 50 square feet in size, which would contribute an additional 3,500 square feet of private open space towards the Project's useable open space requirement. With the addition of the square footage from the enclosed recreation rooms and the residential balconies, the Project would meet the useable open space requirements set forth in LAMC Section 12.21-G.

As previously stated, LAMC Section 17.12, the City's parkland dedication ordinance enacted under the Quimby Act, provides a formula for satisfying park and recreational uses for residential subdivisions through parkland dedication, payment of in-lieu fees, and/or provision of on-site open space, subject to determination by the Advisory Agency. As the Project requires approval of a Tentative Tract Map to create three ground lots and three commercial condominiums, and a Zone Change/Height District Change, LAMC Sections 17.12 and 12.33 would require that approximately 1.44 acres be dedicated as parkland based on the Project's 260 proposed dwelling units. Thus, the Project would be required to dedicate a minimum of 1.44 acres as parkland, or pay in-lieu fees. Although the Project would not include dedicated parkland, as stated above, Section 17.12 provides that the Project be required to pay in-lieu fees as determined by the City or may have some or all of its common open space credited against its land dedication requirement if approved by the Advisory Agency. Through one or a combination of these methods, as determined by the City, parkland dedication impacts with regard to compliance with LAMC Sections 17.12 and 12.33 would be less than significant. Payment of these fees allow the City to implement programs such as the 50 Parks Initiative which focuses on increasing the number of parks in densely populated neighborhoods and communities that lack sufficient open space and recreational services.

### *(c) Conclusion*

Based on the above, the Project would meet on-site open space requirements per LAMC Section 12.21-G and would meet its parkland dedication requirements through either off-site dedication of parkland, payment of in-lieu fees, or a combination of these methods, as determined by the City. **Therefore, the Project would not 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 or other performance objectives for parks. Impacts would be less than significant and no mitigation measures would be required.

## (2) Mitigation Measures

Project-level impacts would be less than significant. Therefore, no mitigation measures are required.

## (3) Level of Significance After Mitigation

Project-level impacts would be less than significant without mitigation.

***Threshold (b): Would the project 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?***

## (1) Impact Analysis

### (a) Construction

Construction of the Project would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project because construction workers move from construction site to construction site throughout the region as specific jobs are temporary/short-term in nature. Therefore, the construction workers associated with the Project would not result in a notable increase in the residential population of the Project vicinity, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

During Project construction, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. There is a potential for construction workers to spend their lunch breaks at parks and recreational facilities that may be located in proximity to the Project Site, specifically Selma Park, at 6657 Selma Avenue, approximately 0.2 miles southwest of the Project Site. However, any resulting increase in the use of such parks and recreational facilities would be temporary and negligible. Furthermore, it is unlikely that workers would utilize parks and recreational facilities beyond a 0.5-mile radius from the Project Site, as lunch breaks typically are not long enough for workers to take

advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes).

As shown in Figure IV.H.5-1 on page IV.H.5-11, there are no parks or recreational facilities adjacent to the Project Site along Hollywood Boulevard or Wilcox Avenue. Therefore, Project construction would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site or interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity. The Project's proposed haul route options from the Project Site would include use of Hollywood Boulevard to/from US-101. The haul route would not travel adjacent to any public park or recreational facility.

Based on the above analysis, Project construction would not 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. **Therefore, impacts on parks and recreational facilities during Project construction would be less than significant, and mitigation measures would not be required.**

*(b) Operation*

As discussed in Section II, Project Description of this Draft EIR, the Project Site is currently occupied by four low-rise commercial buildings that comprise a total of 29,200 square feet of floor area, as well as surface parking. The Project would consist of 260 multi-family residential units and approximately 17,800 square feet of retail, restaurant, and office uses upon completion. As no housing currently exists on the Project Site, there are currently no residents on the Project Site that generate a demand for parks and recreational facilities in the Project vicinity. As discussed in the Initial Study prepared for the Project, which is included in Appendix A of this Draft EIR, the Project's new residential units would introduce an estimated residential population of 630 persons, based on the most recent estimated household size of 2.42 persons per unit for multi-family housing units in the City of Los Angeles area.<sup>20</sup> The population increase associated with the Project would generate increased demand for parks and recreational facilities in the Project vicinity.

The Project would include various amenities to serve the needs of residents and guests, including landscaped open space, a pool, gym and yoga studio, and other amenities, as described in Section II, Project Description, of this Draft EIR. Per LAMC

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<sup>20</sup> Based on a rate of 2.42 persons per multi-family unit based on the 2017 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019.

Section 12.21 G, the Project is required to provide 29,150 square feet of open space, and would provide 33,750 square feet of open space.

Due to the amount, variety, and availability of the proposed open space and recreational amenities, it is anticipated that Project residents would generally utilize on-site open space to meet their recreational needs. Thus, while the Project's estimated 630 residents would be expected to utilize off-site public parks and recreational facilities to some degree, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Similarly, the Project's commercial component would result in 39 permanent jobs based on employee generation rates published by the Los Angeles Unified School District (LAUSD) and based on the Applicant's other properties, the Project's residential component would result in an additional 13 jobs for a total of 52 permanent jobs,<sup>21</sup> would result in a negligible indirect demand for parks and recreational facilities, which would be further off-set by the net reduction in employees attributed to the removal of the Project Site's existing uses. Furthermore, as discussed above, the Project would pay a Dwelling Unit Construction Tax in accordance with LAMC Section 21.10.3(a)(1) and in-lieu parkland fees in accordance with LAMC Sections 12.33 and 17.12 for the purpose of acquiring, expanding, and improving park and recreational facilities for new residents. Therefore, the Project would not 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) Conclusion*

**Based on the above, the Project would not significantly 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. Therefore, impacts to parks and recreational facilities would be less than significant, and no mitigation measures would be required.**

**(2) Mitigation Measures**

Project-level impacts would be less than significant. Therefore, no mitigation measures are required.

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<sup>21</sup> Based on employee generation factors provided in the 2018 LAUSD Developer Fee Justification Study, March 2018.

### (3) Level of Significance After Mitigation

Project-level impacts would be less than significant without mitigation.

***Threshold (c): Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?***

#### (1) Impact Analysis

The Project does not include construction of a park. With respect to on-site facilities, as detailed above, the Project would comply with regulations regarding open space and recreational facilities. In addition, although the Project would introduce a residential population that would generate a demand for parks and recreational facilities, Project residents would be anticipated to utilize the Project's on-site open space and recreational facilities to a greater extent than off-site facilities. **Therefore, the Project would not include or require the construction or expansion of recreational facilities that would result in adverse physical effects on the environment. Impacts would be less than significant and no mitigation measures are required.**

#### (2) Mitigation Measures

Project-level impacts would be less than significant. Therefore, no mitigation measures are required.

### (3) Level of Significance After Mitigation

Project-level impacts would be less than significant without mitigation.

## **e. Cumulative Impacts**

#### (1) Impact Analysis

Cumulative growth in the greater Project area through 2023 includes specific known development projects, growth that maybe projected as result of the land use designation and policy changes contained in the Hollywood Community Plan Update, as well as general ambient growth projected to occur. As identified in Section III, Environmental Setting, of this Draft EIR a total of 107 related projects are located in the vicinity of the Project Site. In addition, the Hollywood Community Plan Update, is identified. A number of the identified related projects and ambient growth projections fall within a 2-mile radius of the Project Site, the geographic area analyzed for purposes of assessing impacts to parks and recreational facilities.

As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 107 is a conservative assumption, as some of the related projects may not be built out by 2023 (i.e., the Project buildout year), may never be built, or may be approved and built at reduced densities. To provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 107 are fully built out by 2023, unless otherwise noted. In addition, the Hollywood Community Plan Update, once adopted, will be a long-range plan designed to accommodate growth in Hollywood until 2040. Only the initial period of any such projected growth would overlap with the Project's future baseline forecast, as the Project is to be completed in 2023, well before the Hollywood Community Plan Update's horizon year. Moreover, 2023 is a similar projected buildout year as many of the 107 related projects that have been identified. Accordingly, it can be assumed that the projected growth reflected by the list of related projects, which itself is a conservative assumption as discussed above, would account for any overlapping growth that may be assumed by the Hollywood Community Plan Update upon its adoption.

As discussed above, while it is anticipated that the Project's provision of on-site open space would serve the recreational needs of Project residents, the Project would not meet all of the parkland provision goals set forth in the Public Recreation Plan. Development of the related projects would exacerbate the Hollywood Community Plan Area's deficiency in parkland per the Public Recreation Plan's standards, with the exception of the Hollywood Central Park related project, which would make a substantial positive contribution toward meeting these goals. However, it is unknown whether the Hollywood Central Park will be approved and constructed. Notwithstanding, as previously indicated, the standards set forth in the Public Recreation Plan are Citywide goals and are not intended to be requirements for individual development projects. In addition, the City does not construct parks to address demand that may be created through new projects, but rather based on addressing the deficiencies identified in the Community Needs Assessment. Through the 50 Parks Initiative, the RAP has identified priority areas, project funding, and opportunities for community partnership to develop and maintain new parks in the City.<sup>22</sup> One such park, Carlton Way Park located 0.8 mile east of the Project Site, has already been developed.<sup>23</sup> In addition, as with the Project, the related projects and other future development projects in the Hollywood Community Plan area would undergo discretionary review on a case-by-case basis and would be expected to coordinate with RAP. Future development projects would also be required to comply with the park and recreation requirements of LAMC Sections 12.21 G, 17.12, 12.33, and 21.10.3(a)(1), as

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<sup>22</sup> City of Los Angeles Department of Recreation and Parks, *50 Parks Initiative, Implementation*, [www.laparks.org/50parks/implementation](http://www.laparks.org/50parks/implementation), accessed January 14, 2020.

<sup>23</sup> City of Los Angeles Department of Recreation and Parks, *50 Parks Initiative, Map*, [www.laparks.org/50parks/map](http://www.laparks.org/50parks/map), accessed January 14, 2020.



applicable, which would allow the City to develop more parks through programs such as the 50 Parks Initiative. As such, cumulative impacts to parks and recreational facilities would be less than significant. Furthermore, based on the above, the Project's contribution to cumulative impacts to parks and recreational facilities would not be cumulatively considerable.

## (2) Mitigation Measures

Cumulative impacts would be less than significant. Therefore, no mitigation measures are required.

## (3) Level of Significance After Mitigation

Cumulative impacts would be less than significant without mitigation.