

## **IV. Environmental Impact Analysis**

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

#### **1. Introduction**

This section analyzes the potential impacts of the Project on parks and recreational facilities. The analysis addresses questions listed in Section XIV. Public Services—Parks; and Section XV. Recreation, in Appendix G of the State CEQA Guidelines (Appendix G). CEQA requires projects to analyze the physical impacts associated with the provision of new or altered facilities, the construction of which could cause significant environmental impacts and the physical deterioration of existing parks from new project demands. The demand for park and recreational facilities created by the Project is evaluated in light of the open space and recreational facilities to be provided as part of the Project and applicable City of Los Angeles (City) goals and regulatory requirements regarding the need for such facilities. Information and analysis in this section is based, in part, on existing service ratios, existing parks and recreational facilities, and other information provided by the Los Angeles Department of Recreation and Parks (RAP) in correspondence dated July 23, 2020. This correspondence is included in Appendix Q of this Draft EIR.

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

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

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding parks and recreation services in the City. As described below, these plans and guidelines include:

- Quimby Act
- City of Los Angeles Charter
- City of Los Angeles General Plan, including:
  - Framework Element
  - Open Space Plan
  - Public Recreation Plan

- Health and Wellness Plan
- Community Plan
- Los Angeles Municipal Code
- Los Angeles Department of Recreation and Parks 2009 Citywide Community Needs Assessment
- Los Angeles Department of Recreation and Parks—50 Parks Initiative
- Park Proud LA Strategic Plan 2018–2022

### (1) State Level

#### *(a) Quimby Act*

California Government Code Section 66477, also known as the Quimby Act, was enacted by the California legislature in 1965. 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 tract map or parcel map. As discussed below, the City implemented the Quimby Act in the City through the adoption of Los Angeles Municipal Code (LAMC) Sections 17.12, 12.33 and 19.17.

### (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 of Los Angeles. 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.

*(b) City of Los Angeles General Plan**(i) Framework Element*

The City of Los Angeles General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, includes park and open space policies for the provision, management, and conservation of Los Angeles' open space resources while addressing the outdoor recreation needs of the City's residents, and is intended to guide the amendment of the General Plan's Open Space and Conservation Elements.

The Framework Element's Chapter 6, Open Space and Conservation, and Chapter 9, Infrastructure and Public Services, contain policies that address the provision of parks and open space within the City, as identified in Table IV.I.5-1 on page IV.I.5-4.

*(ii) Open Space Element*

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. 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 public 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.

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 undergoing revisions by the Department of City Planning. Until approval of the pending updates to the Open Space Element, the RAP is operating under the guidance of the Public Recreation Plan (PRP) discussed below.

*(iii) Service Systems Element—Public Recreation Plan*

As a part of the General Plan's Service Systems Element, the PRP establishes policies and standards related to parks, and recreational facilities in the City. The PRP was adopted in 1980 by the City Council and amended by City Council resolution in

**Table IV.I.5-1  
Relevant General Plan Policies**

<b>Framework Element—Chapter 6, Open Space and Conservation</b>	
Policy 6.2.1	Establish, where feasible, the linear open space system represented in the Citywide Greenways Network map, to provide additional open space for active and passive recreational uses and to connect adjoining neighborhoods to one another and to regional open space resources.
Policy 6.2.2	Protect and expand equestrian resources, where feasible, and maintain safe links in major public open space areas such as Hansen Dam, Sepulveda Basin, Griffith Park, and the San Gabriel, Santa Monica, Santa Susanna Mountains and the Simi Hills.
Policy 6.4.1	Encourage and seek to provide for usable open space and recreational facilities that are distributed throughout the City.
Policy 6.4.2	Encourage increases in parks and other open space lands where deficiencies exist, such as South East and South Central Los Angeles and neighborhoods developed prior to the adoption of the State Quimby Act in 1965
Policy 6.4.3	Encourage appropriate connections between the City's neighborhoods and elements of the Citywide Greenways Network.
Policy 6.4.5	Provide public open space in a manner that is responsive to the needs and wishes of the residents of the City's neighborhoods through the involvement of local residents in the selection and design of local parks. In addition to publicly-owned and operated open space, management mechanisms may take the form of locally run private/non-profit management groups, and should allow for the private acquisition of land with a commitment for maintenance and public access.
Policy 6.4.6	Explore ways to connect neighborhoods through open space linkages, including the "healing" of neighborhoods divided by freeways, through the acquisition and development of air rights over freeways (such as locations along the Hollywood Freeway between Cahuenga Pass and Downtown), which could be improved as a neighborhood recreation resource.
Policy 6.4.7	Consider as part of the City's open space inventory of pedestrian streets, community gardens, shared school playfields, and privately-owned commercial open spaces that are accessible to the public, even though such elements fall outside the conventional definitions of "open space." This will help address the open space and outdoor recreation needs of communities that are currently deficient in these resources
Policy 6.4.8	Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods.
Policy 6.4.9	Encourage the incorporation of small-scaled public open spaces within transit-oriented development, both as plazas and small parks associated with transit stations, and as areas of public access in private joint development at transit station locations.
Policy 6.4.11	Seek opportunities to site open space adjacent to existing public facilities, such as schools, and encourage the establishment of mutually beneficial development agreements that make privately-owned open space accessible to the public. For example, encourage the improvement of scattered small open spaces for public access in private projects with small branch libraries, child care centers, or decentralized schools.

**Table IV.I.5-1 (Continued)**  
**Relevant General Plan Policies**

<b>Framework Element—Chapter 9, Infrastructure and Public Services</b>	
Policy 9.23.2	Prioritize the implementation of recreation and park projects in areas of the City with the greatest existing deficiencies.
Policy 9.23.5	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.
Policy 9.23.7	Establish guidelines for developing non-traditional public park spaces like community gardens, farmer's markets, and public plazas.
Policy 9.24.1	Phase the development of new programs and facilities to accommodate projected growth.
<hr/> <i>Source: City of Los Angeles, 2001.</i>	

March 2016. The amendments modernize the PRP's recommendations and provide for more flexibility and equity in the distribution of funds used for the acquisition and development of recreational resources. The PRP also addresses the need for publicly accessible neighborhood, community, and regional recreational sites and facilities across the City. The PRP focuses on recreational site and facility planning in underserved neighborhoods with the fewest existing resources and the greatest number of potential users (i.e., where existing residential development generates the greatest demand), as well as areas where new subdivisions, intensification of existing residential development, or redevelopment of "blighted" residential areas creates new demand.

The amended PRP establishes general guidelines for neighborhood, community, and regional recreational sites and facilities that address general service radius and access as well as service levels relative to population within that radius. The PRP also states that the allocation of acreage for community and neighborhood parks should be based on the resident population within that general service radius. Toward this end, the amended PRP recommends the goals of 2.0 acres each of neighborhood and community recreational sites and facilities per 1,000 residents, and 6.0 acres of regional recreational sites and facilities per 1,000 residents. To determine existing service ratios, the RAP commonly uses the geographic area covered by the applicable Community Plan rather than the park service radius. The PRP does not establish requirements for individual development projects.

For a given neighborhood recreational site or facility, the amended PRP does not recommend a specific size, noting only that a school playground may partially serve this function (with up to one-half of its acreage counted toward the total acreage requirement [service level per capita]). The amended PRP does not define a specific service radius for

neighborhood recreational sites and facilities, instead recommending that they should generally be within walking distance and not require users to cross a major arterial street or highway for access.

For community recreational sites and facilities, the amended PRP states that facilities may be of any size, but are generally larger than neighborhood parks, and a high school site may be counted toward half the acreage requirement/service level per capita. The amended PRP does not define a specific service radius for community recreational sites and facilities, instead recommending that they should generally be accessible within a relatively short bicycle, bus, or car trip, and easily accessible.

For regional recreational sites and facilities, the amended PRP states that facilities may be large urban recreational sites or smaller sites or facilities that draw visitors from across the City. The amended PRP does not define a specific service radius or further qualify access, stating only that the service radius should be that within a reasonable drive.

*(iv) Health and Wellness Element*

The City's *Plan for a Healthy Los Angeles* lays the foundation to create healthier communities for all Angelenos. As an Element of the General Plan, it provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City's future growth and development. Chapter 3 of the Plan, Bountiful Parks and Open Spaces, outlines policies and objectives to increase the availability of parks through park funding and allocation, park expansion, the Los Angeles River, park quality and recreation programs, park safety, local partnerships, water recreation, and active spaces. Specifically, the objectives include:

- Increase the number of neighborhood and community parks so that every Community Plan Area strives for 3 acres of neighborhood and community park space per 1,000 residents (excluding regional parks and open spaces).
- Increase access to parks so that 75 percent of all residents are within a 0.25 mile walk of a park or open space facility.
- Increase the number of schools (public, private, and charter) that have shared use agreements for community use outside of normal school hours by 25 percent.
- Increase the miles of the Los Angeles River that are revitalized for natural open space and physical activity, particularly in low-income areas.
- Increase the number of parks that feature or incorporate universally-accessible features.

- Improve the percentage of citywide population meeting physical fitness standards per week so that 50 percent of the population meets physical activity guidelines.

*(v) Hollywood Community Plan*

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to open space required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

As discussed in Section IV.G, Land Use, of this Draft EIR, the Project Site is located within the Hollywood Community Plan (Community Plan) area. The 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.

The Community Plan Area has an existing neighborhood and community parkland-to-population ratio of 0.41 acre per 1,000 residents, while the City has a parkland-to-population ratio of 0.84 acre per 1,000 residents.<sup>1</sup> Thus, the Community Plan area has a lower parkland-to-population ratio compared to the City and both the Community Plan area and the City are underserved when considering the desired parkland standards provided in the PRP. However, the Community Plan ratio does not include regional parks such as Runyon Canyon Park and Griffith Park. Runyon Canyon Park, a 130-acre regional park located at the base of the Santa Monica Mountains at a distance of 1.8 miles from the Project Site, provides hiking opportunities and off-leash dog areas in an "urban wilderness" setting.<sup>2</sup> The 4,511-acre Griffith Park offers numerous family attractions, an assortment of educational and cultural institutions, and more than 70 miles of hiking and horseback riding trails.<sup>3</sup> Bronson Canyon, which is located within Griffith Park, also offers picnic areas and hiking trails.<sup>4</sup>

*(c) Los Angeles Municipal Code*

*(i) Park Fee Ordinance*

In September 2016, the City adopted Ordinance No. 184,505, Parks Dedication and Fee Update Ordinance (Park Fee Ordinance).<sup>5</sup> The aim of the Park Fee Ordinance is to increase the opportunities for park space creation and expand the fee program beyond those projects requiring a subdivision map to include a park linkage fee for all net new residential units. The Park Fee Ordinance amends LAMC Sections 12.21, 12.33, 17.03,

<sup>1</sup> Written correspondence from Darryl Ford, Acting Superintendent, Planning, Maintenance, and Construction Branch, Department of Recreation and Parks, July 23, 2020.

<sup>2</sup> National Park Service, Map and Site information: Runyon Canyon Park, [www.nps.gov/samo/planyourvisit/runyoncanyon.htm](http://www.nps.gov/samo/planyourvisit/runyoncanyon.htm), accessed November 12, 2021.

<sup>3</sup> RAP, Griffith Park, Map & Guide, 2016.

<sup>4</sup> RAP, Bronson Canyon, [www.laparks.org/park/bronson-canyon](http://www.laparks.org/park/bronson-canyon), accessed November 12, 2021.

<sup>5</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.



17.12 and 17.58, deletes LAMC Sections 17.07 and 19.01, and adds LAMC Section 19.17. The Park Fee Ordinance increases Quimby 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 Park Fee Ordinance is January 11, 2017. The Park Fee Ordinance provides that any project that has acquired vested rights under LAMC Section 12.26-A,<sup>3</sup> prior to the effective date of the Park Fee 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 effective date of the Park Fee Ordinance, shall not be subject to the park fees set forth in the Park Fee Ordinance. The Project's entitlement applications and its vesting tentative map application were deemed complete prior to the Park Fee Ordinance becoming effective. As such, the Project is not subject to the park fee provisions of the Park Fee Ordinance. The Project is subject to the provisions that were in effect at the time the Project was deemed complete, summarized below.

*(ii) LAMC Section 12.21-G*

LAMC Section 12.21-G 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. LAMC Section 12.21-G also identifies what areas of a project would qualify as usable open space for the purposes of meeting the project's open space requirements.

As stated in LAMC Section 12.21-G, 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 can account for up to 25 percent of the usable open space requirements. Private open space is defined as area which is contiguous to and immediately accessible from an individual dwelling unit that may have a dimension no less than six feet in any direction and must contain a minimum of 50 square feet, of which no more than 50 square feet per dwelling unit can be counted towards the total required usable open space.

*(iii) LAMC Section 17.12*

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 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 zoning of the project site and must be paid prior to the issuance of building permits. These fees are adjusted annually. Further, 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.

*(iv) Finn Fees*

Similar to LAMC 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 LAMC Section 17.12.

*(v) Dwelling Unit Construction Tax*

Pursuant to LAMC Section 21.10.3(a)(1) (Dwelling Unit Construction Tax), the City imposes a tax of \$200 per dwelling unit on the construction of all new dwelling units and modification of existing dwelling units to be paid to the Los Angeles Department of Building and Safety. These taxes are placed into a "Park and Recreational Sites and Facilities Fund" to be used exclusively for the acquisition and development of park and recreational sites. 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 LAMC Sections 17.12 or 12.33, the required Dwelling Unit Construction Tax is reduced accordingly.

*(d) Citywide Community Needs Assessment*

In 2009, the RAP commissioned an update of the last Recreation and Parks Needs Assessment from 1999 as a preliminary step in developing a citywide park master plan and five-year capital improvement plan. The report provides an inventory of existing facilities, defines geographic areas of need and recommended facilities to serve specific populations, and identifies priorities for additional parks and recreation facilities. The report provides a more current assessment of conditions and future needs compared to the PRP, while the PRP recommends the ratios of park acreage per person used in the analysis.

*(e) Department of Recreation and Parks 50 Parks Initiative*

In response to the 2009 Citywide Community Needs Assessment, the RAP developed the 50 Parks Initiative with the purpose of substantially increasing the number of parks and facilities available across the City, with a specific focus on densely populated neighborhoods and communities that lack sufficient open space and recreational services.

*(f) Park Proud LA Strategic Plan 2018–2022*

The Park Proud LA Strategic Plan (Parks Strategic Plan) is the most recent strategic plan for the RAP, effective from 2018 until 2022. The Parks Strategic Plan highlights critical work that needs to be accomplished over the next several years to ensure that the City has an accessible, equitable, and first class park system. The Parks Strategic Plan reflects chief priorities of the RAP, confronts new and existing challenges, and lays the framework to pursue new opportunities. Within the Parks Strategic Plan, there are over two dozen outcomes organized under the following seven high-level priority goals:

- Provide safe and accessible parks;
- Offer affordable and equitable recreation programming;
- Create and maintain world class parks and facilities;
- Actively engage communities;
- Ensure an environmentally sustainable park system;
- Build financial strength and innovative partnerships; and
- Maintain a diverse and dynamic workforce.

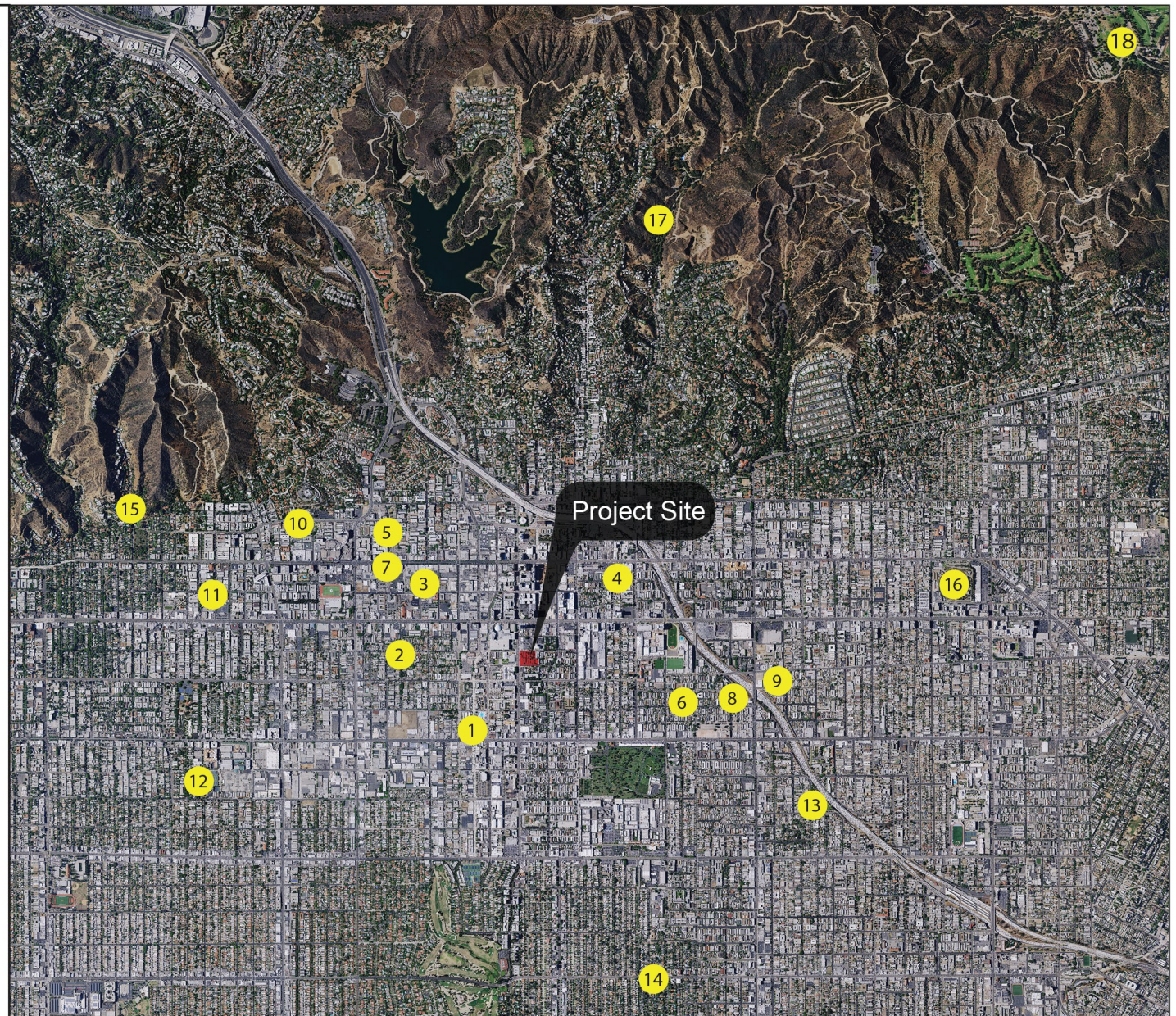
## **b. Existing Conditions**

There are no parks or recreational facilities located on the Project Site. As shown in Figure IV.I.5-1 on page Figure IV.I.5-1, there are a number of parks and recreational facilities located within an approximate 2-mile radius of the Project Site. Table IV.I.5-2 on page IV.I.5-13 lists the size, type of park, amenities, and approximate driving distance from the Project Site for these public parks and recreational facilities.



## LEGEND

- 1 **Hollywood Pool & Recreation Center**  
1122 Cole Ave., Los Angeles, CA 90038
- 2 **De Longpre Park**  
1350 N. Cherokee Ave., Los Angeles, CA 90028
- 3 **Selma Park**  
6567 Selma Ave., Los Angeles, CA 90028
- 4 **Carlton Way Park**  
5927 Carlton Way, Los Angeles, CA 90028
- 5 **Yucca Park & Community Center**  
6671 Yucca St., Los Angeles, CA 90028
- 6 **Seily Rodriguez Park**  
5707 Lexington Ave., Los Angeles, CA 90028
- 7 **Las Palmas Senior Citizen Center**  
1820 Las Palmas Ave., Los Angeles, CA 90028
- 8 **Lexington Avenue Pocket Park**  
5523 Lexington Ave., Los Angeles, CA 90038
- 9 **La Mirada Park**  
5401 La Mirada Ave., Los Angeles, CA 90029
- 10 **Dorothy & Benjamin Smith Park**  
7020 Franklin Ave., Los Angeles, CA 90028
- 11 **Runyon Canyon Park & Dog Park**  
2000 N. Fuller Ave., Los Angeles, CA 90046
- 12 **Poinsettia Recreation Center**  
7341 Willoughby Ave., Los Angeles, CA 90046
- 13 **Lemon Grove Recreation Center**  
4959 Lemon Grove Ave., Los Angeles, CA 90029
- 14 **Robert L. Burns Park**  
4900 Beverly Blvd., Los Angeles, CA 90004
- 15 **Wattles Garden Park**  
1850 N. Curson Ave., Los Angeles, CA 90046
- 16 **Barnsdall Art Park**  
4800 Hollywood Blvd., Los Angeles, CA 90027
- 17 **Bronson Canyon**  
3200 Canyon Rd., Los Angeles, CA 90068
- 18 **Griffith Park**  
4730 Crystal Springs Dr., Los Angeles, CA 90027



**Figure IV.I.5-1**

Parks and Recreational Facilities within a 2-Mile Radius of the Project Site



**Table IV.I.5-2  
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>Hollywood Pool &amp; Recreation Center</b> 1122 Cole Ave. Los Angeles, CA 90038	0.34	Pool, Recreation Center	Youth Sports, Arts & Crafts, Cooking, Day Camp, Basketball Courts, Sports Field, Pool
2	<b>Selma Park</b> 6567 Selma Ave. Los Angeles, CA 90028	0.46	Park	Children's Play Area, Benches, Outdoor Tables
3	<b>De Longpre Park</b> 1350 N. Cherokee Ave. Los Angeles, CA 90028	0.51	Park	Children's Play Area, Benches
4	<b>Carlton Way Park</b> 5927 Carlton Way Los Angeles, CA 90028	0.54	Park	Children's Play Area, Fitness Equipment
5	<b>Yucca Park &amp; Community Center</b> 6671 Yucca St. Los Angeles, CA 90028	0.73	Park, Community Center	Youth Sports, After School Club, Computer Lab, Seasonal Camps, Basketball, Soccer
6	<b>Seily Rodriguez Park</b> 5707 Lexington Ave. Los Angeles, CA 90028	0.74	Park	Basketball, Children's Play Area, Picnic Tables, Benches
7	<b>Las Palmas Senior Citizen Center</b> 1820 Las Palmas Ave. Los Angeles, CA 90028	0.82	Senior Citizen Center	Community Events, Exercise Programs, Computer Lab, Auditorium
8	<b>Lexington Avenue Pocket Park</b> 5523 Lexington Ave. Los Angeles, CA 90038	0.91	Park	Children's Play Area, Benches
9	<b>Dorothy &amp; Benjamin Smith Park</b> 7020 Franklin Ave. Los Angeles, CA 90028	1.07	Park	Benches, Sitting Area
10	<b>La Mirada Park</b> 5401 La Mirada Ave. Los Angeles, CA 90029	1.12	Park	Outdoor Fitness Equipment, Picnic Tables
11	<b>Lemon Grove Recreation Center</b> 4959 Lemon Grove Ave. Los Angeles, CA 90029	1.44	Recreation Center	Youth Sports, After School Club, Arts & Crafts, Music Programs, Baseball, BBQ, Basketball, Picnic Tables

**Table IV.I.5-2 (Continued)**  
**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>
12	<b>Runyon Canyon Park &amp; Dog Park</b> 2000 N. Fuller Ave. Los Angeles, CA 90046	1.45	Regional Park, Dog Park	Hiking Trail, Dog Park, Children's Play Area
13	<b>Poinsettia Recreation Center</b> 7341 Willoughby Ave. Los Angeles, CA 90046	1.48	Recreation Center	Baseball, Basketball, Children's Play Area, Sports Leagues, Camps, Tennis Courts, Fitness Equipment, Stage
14	<b>Robert L. Burns Park</b> 4900 Beverly Blvd. Los Angeles, CA 90004	1.53	Park	Children's Play Area, Picnic Tables
15	<b>Wattles Garden Park</b> 1850 N. Curson Ave. Los Angeles, CA 90046	1.75	Regional Park	Community Garden, Hiking Trail
16	<b>Barnsdall Art Park</b> 4800 Hollywood Blvd. Los Angeles, CA 90027	1.87	Regional Park	Art Center, Gallery Theatre, Hollyhock House, Junior Art Center, Municipal Art Gallery
17	<b>Bronson Canyon</b> 3200 Canyon Rd. Los Angeles, CA 90068	2.0	Regional Park	Picnic Tables, Hiking Trail
18	<b>Griffith Park</b> 4730 Crystal Springs Dr. Los Angeles, CA 90027	1.4–3.7 <sup>d</sup>	Regional Park	Hiking Trails, Dog Area, Observatory, Zoo, Picnic Areas

<sup>a</sup> Map numbers correspond with Figure IV.I.5-1 on page IV.I.5-12.

<sup>b</sup> Distances represent approximate aerial bird's eye view distances as determined by Google Maps.

<sup>c</sup> Facilities classified as Regional Parks draw visitors from outside a two-mile radius and are listed for informational purposes.

<sup>d</sup> RAP identified Griffith Park at 4730 Crystal Springs Drive (Griffith Park Visitor Center Auditorium), which is approximately 3.7 miles from the Project Site. However, as Griffith Park is over 4,000 acres in size and is accessible at multiple points throughout the City, distance from Project Site can depend on which entrance visitors use. For informational purposes, the approximately 1.4-mile distance listed from the Project Site to the closest portion of Griffith Park is also included.

Source: RAP Facility Locator, [www.laparks.org](http://www.laparks.org), accessed August 5, 2020; Written correspondence from Darryl Ford, Acting Superintendent, Planning, Maintenance, and Construction Branch, Department of Recreation and Parks, July 23, 2020.

### 3. Project Impacts

#### a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G (Appendix G), the 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 governmental 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 Thresholds as the thresholds of significance. The factors and considerations identified below from the *L.A. CEQA Thresholds Guide* will be used where applicable and relevant to assist in answering the Appendix G thresholds. The *L.A. CEQA Thresholds Guide* identifies the following criteria to evaluate parks and recreation:

- 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 park and recreation impacts included the following: (1) reviewing the existing parks and recreational facilities in the vicinity of the

Project Site; (2) projecting the future population associated with the Project; and (3) evaluating the demand for park and recreation service anticipated at the time of buildout of the Project 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 PRP).

### c. Project Design Features

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

### d. Analysis of Project Impacts

As set forth in Section II, Project Description, of this Draft EIR, the Project proposes two development options—the Residential Option and the Office Option.

The Residential Option would develop a new high-rise building with four levels of subterranean parking consisting of up to 429 new residential units, including 36 units designated for Very Low Income households, an approximately 55,000-square-foot grocery store, approximately 5,000 square feet of neighborhood-serving commercial retail uses, and 8,988 square feet of uses in the bungalows. The bungalows would be rehabilitated and adapted for reuse as either restaurants or 12 residential units, in which case the development would still propose a total of 429 residential units.

The Office Option would develop a new high-rise building with eight levels of subterranean parking with approximately 463,521 square feet of office uses and 11,914 square feet of restaurant uses in the proposed building, as well as 8,988 square feet of uses in the bungalows. The bungalows would be rehabilitated and adapted for reuse as either restaurants or nine residential units.

The following analysis accounts for both development options and the term "Project" is used unless stated otherwise.

***Threshold (a): Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental 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 PRP's recommended long-range standard for both neighborhood sites and facilities and community sites and facilities are 2 acres per 1,000 residents. The PRP also 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 Plan Area currently does not meet the PRP's recommended standards. However, as previously indicated, these standards are Citywide goals and are not intended to serve as requirements for individual development projects. Furthermore, as described above in Section 2.a.(2)(d), the Citywide Community Needs Assessment states that since the time that the PRP was adopted in 1980, the distance many people are willing to travel to parks and recreational facilities has increased substantially.

As described above, the Residential Option would develop 429 residential units, and the Office Option would develop nine residential units. As such, the Residential Option would provide a more conservative approach in determining a new service population. In providing 429 residential units, the Project would result in approximately 966 new residents on the Project Site.<sup>6</sup> When applying the Citywide goals to the Project, based on the Project's estimated 966 new residents, the Project would need to provide approximately 2 acres of neighborhood parkland to meet the PRP's long-range standard of 2 acres per 1,000 residents and approximately 1.0 acre to meet the PRP's more attainable short- and intermediate-range standard of 1 acre per 1,000 residents. Similarly, the Project would need to provide 2 acres of community parkland to meet the PRP's long-range standard for community parks of 2 acres per 1,000 residents and approximately 1 acre to meet the PRP's more attainable short- and intermediate-range standard of 1 acre per 1,000 residents.

The Residential Option would include approximately 38,400 square feet (0.88 acre) of common open space, which would consist of a variety of open space features and recreational amenities that serve residents' recreational needs. The Office Option would provide 36,331 sf (approx. 0.83 acre) of common open space, of which 2,100 square feet of open space would be set aside for use by residents if the bungalows are rehabilitated as residential units. These amounts of common open space would fall short of the PRP's short-, intermediate-, and long-range standards for neighborhood and community sites and facilities. However, as previously stated, the PRP parkland standards are Citywide goals and do not constitute requirements for individual development projects. Furthermore,

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<sup>6</sup> Based on City of Los Angeles VMT Calculator Documentation (Version 1.3), May 2020, Table 1: Land Use and Trip Generation Base Assumptions.

compliance with regulatory requirements, including applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces (discussed below), would ensure that the intent of the PRP's parkland policies and standards would be met. Such requirements include the provision of on-site recreational amenities and open space and payment of the Dwelling Unit Construction Tax and Quimby fees.

*(b) Los Angeles Municipal Code*

As discussed above, a new Park Fee Ordinance became effective on January 11, 2017. However, as the Project's entitlement applications, including its vesting tentative tract map application, were deemed complete prior to this date, it is not subject to the new park fee provisions of the Ordinance and is, instead, subject to the LAMC provisions that were in effect when the Project's entitlement applications were deemed complete. An evaluation of the Project's consistency with these provisions is provided below.

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 Residential Option would be required to provide a total of 54,275 square feet of usable open space, as shown in Table IV.I.5-3 on page IV.I.5-19. The Residential Option would provide a total of 54,850 square feet of usable open space consisting of common open space (e.g., courtyards, pool, fitness centers) and private open space (balconies) for its residents. Thus, the Residential Option would meet the LAMC's requirement for the provision of usable open space. If the Office Option is developed with restaurants (i.e., not residential uses) within the rehabilitated bungalows, then open space would not be required by the LAMC. Nonetheless, this scenario would provide 15,541 square feet of outdoor open space on the ground floor, a 4,969-square-foot outdoor deck on Level 17, and 15,821 square feet of indoor amenities on Level 17. Such indoor amenities would include an 8,243-square-foot fitness center, 1,283-square-foot yoga room, 3,156-square-foot lounge, and 3,139-square-foot billiard room.

As shown in Table IV.I.5-4 on page IV.I.5-20, pursuant to LAMC Section 12.21-G, if the Office Option is developed with nine two-bedroom residential units within the rehabilitated bungalows, then 1,575 square feet of open space would be required by the LAMC. The Office Option would exceed this requirement by providing 2,100 square feet of open space on the ground level for residential use. Under this scenario, the new building would also include the amenities for use by office tenants as discussed above.

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 Residential Option would be required to provide 27,138 square feet of common open space. The Residential Option would exceed this requirement via the provision of 38,400 square feet of

**Table IV.I.5-3  
Open Space Required by LAMC Section 12.21-G and Provided by the Residential Option**

Open Space Requirement	Quantity	Requirement per Unit	Total Required
1-bed (with less than 3 habitable rooms)	240 du	100 sf per du	24,000 sf
1-bed plus den (with 3 habitable rooms)	56 du	125 sf per du	7,000 sf
2-bed (with more than 3 habitable rooms)	133 du	175 sf per du	23,275 sf
Total Open Space Required			54,275 sf
Open Space Proposed	Total Provided		
Outdoor Common			
Level 1 Open and Landscaped Areas	13,350 sf		
Level 10 Outdoor Landscaped Amenity Deck	13,800 sf		
Outdoor Common Space Subtotal	27,150 sf (approx. 0.62 acre)		
Indoor Common			
Level 1 Indoor Lobby/Lounge	1,000 sf		
Level 10 Indoor Amenity Area	10,250 sf		
Indoor Common Space Subtotal	11,250 sf (approx. 0.26 acre)		
Private			
Unit Balconies	16,450 sf (approx. 0.38 acre)		
Total Provided	54,850 sf (approx. 1.26 acres)		
<hr/>			
du = dwelling units			
sf = square feet			
Source: ONNI, 2021.			

common open space, which would constitute approximately 70 percent of the total usable open space provided. The Office Option with residential bungalows would be required to provide 787.5 square feet of common open space. The Office Option would provide 2,100 square feet of common open space for the residential bungalows, which would exceed the requirement.

Additionally, pursuant to LAMC Section 12.21-G, a minimum of 25 percent of the required common open space must be planted with ground cover, shrubs, and trees. Therefore, the Residential Option would be required to provide a minimum of 6,785 square feet of landscaped common open space. The Residential Option would provide 10,889 square feet of landscaping on-site, including 3,893 square feet on the ground floor and 6,996 square feet on the amenity deck on Level 10. Therefore, the Residential Option would be consistent with this provision of the LAMC. Furthermore, Section 12.21-G requires one 24-inch box tree per four dwelling units. Based on the 429 dwelling units proposed by the Residential Option, 108 trees would be required. As the Residential

**Table IV.I.5-4**  
**Open Space Required by LAMC Section 12.21-G and Provided by the Office Option with Residential Bungalows**

Open Space Requirement	Quantity	Requirement per Unit	Total Required
2-bed (with more than 3 habitable rooms)	9 du	175 sf per du	1,575 sf
<b>Total Open Space Required</b>			<b>1,575 sf</b>
<b>Open Space Proposed</b>	<b>Total Provided</b>		
<b>Outdoor Common</b>			
Level 1 Open and Landscaped Areas	15,541 sf (including 2,100 sf for residents)		
Level 17 Deck	4,969 sf		
<i>Outdoor Common Space Subtotal</i>	<i>20,510 sf (approx. 0.47 acre)</i>		
<b>Indoor Common</b>			
Level 17 Indoor Amenities	15,821 sf		
<i>Indoor Common Space Subtotal</i>	<i>15,821 sf (approx. 0.36 acre)</i>		
<b>Total Provided</b>	<b>36,331 sf (approx. 0.83 acre)</b>		
<hr/>			
<i>du = dwelling units</i>			
<i>sf = square feet</i>			
<i>Source: ONNI, 2021.</i>			

Option would provide a total of 146 trees on-site, the Residential Option would be consistent with this provision of the LAMC.

The Office Option with residential bungalows would be required to provide a minimum of 393.75 square feet of landscaped common open space and three trees. The development would exceed these requirements by providing 2,100 square feet of landscaped common open space for residential use, 23,438 square feet of landscaping for non-residential use, and 146 trees on-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. On Level 10, the Residential Option would provide 10,250 square feet of indoor common areas which may include a fitness center and/or club room. Additionally, the Residential Option would provide a 1,000-square-foot lobby/lounge on the ground floor. Both of these amenities would meet the minimum 600-square-foot size requirement set forth in LAMC Section 12.21-G. In total, these enclosed recreation areas comprise an area of 11,250 square feet, or approximately 21 percent of the total

open space required. Therefore, these enclosed areas would not exceed the 25 percent maximum, and the Residential Option would be consistent with this provision of the LAMC.

The Office Option with residential bungalows would also be consistent with these provisions as the 2,100 square feet of common open space for residents would be open to the sky.

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 both a Tentative Tract Map and a Zone Change/Height District Change, LAMC Sections 17.12 and 12.33 would require that approximately 2.37 acres of the lot area be dedicated as parkland based on the Project's proposed density of over 100 dwelling units per acre. Thus, the Project would be required to dedicate a minimum of 2.37 acres of the Project Site as parkland, or pay in-lieu fees. Although the Project would not include dedicated parkland, as stated above, LAMC Section 17.12 provides that common open space may be credited against a project's land dedication requirement if approved by the Advisory Agency. However, there is the potential that some or all of the Project's common open space may not be credited toward the Project's land dedication requirement, in which case the Project would be required to pay in-lieu fees as determined by the City. Through one or a combination of these methods, as determined by the City, impacts with regard to compliance with LAMC Sections 12.33 and 17.12 would be less than significant.

*(c) Hollywood Community Plan*

The Project would support the objectives and policies of the Community Plan through the provision of on-site open space, recreational amenities, and landscaping, as discussed above, which would offset the demand that would be generated by Project residents for public parks and recreational facilities in the Community Plan area. In the absence of public land in the surrounding high-density area, the Project would provide recreational sites and facilities for its residents. Specifically, the Project would provide open space for residents, and a publicly accessible retail plaza, within a highly urbanized area. The Project would provide a variety of passive recreation areas, including seating and shaded trees, allowing residents to have flexible use of open space. In addition, landscaping and greenery would surround and preserve the area surrounding the historic bungalows. As such, the Project would tailor amenities and open space to the social and cultural characteristics of the neighborhood. In addition, Project development would not diminish the quality or accessibility of, or result in the removal of, existing parks or recreational facilities in the Community Plan area. Thus, impacts with respect to consistency with the Community Plan would be less than significant.

*(d) Conclusion*

In determining the Project's potential impacts to parks and recreational facilities, this analysis evaluates the potential demand of Project residents for public parks and recreational facilities, as well as the Project's consistency with applicable plans, policies, and regulations related to parks and recreational facilities. As discussed above, due to the amount, variety, and availability of the Project's proposed open space and recreational amenities, it is anticipated that Project residents would generally utilize on-site open space and recreational amenities to meet their needs. Furthermore, the Project would meet the applicable requirements set forth by the LAMC. The Project would not meet the parkland provision goals set forth in the PRP. However, as previously indicated, these are Citywide goals and are not intended to be requirements for individual development projects. Furthermore, the Project would ensure that the intent of the PRP'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.

**Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks and recreational facilities, need for new or physically altered parks and recreational 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. As such, impacts would be less than significant.**

**(2) Mitigation Measures**

Project impacts with regard to parks and recreational facilities would be less than significant with compliance with regulatory requirements. Therefore, no mitigation measures are required.

**(3) Level of Significance After Mitigation**

Project impacts related to parks and recreational facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact levels remain less than significant.

***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, and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on the Project is negligible. 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 (i.e., less than 0.5 mile). 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). According to Table IV.I.5-2 on page IV.I.5-13, most parks and recreational facilities within a 2-mile radius of the Project are at least 0.5 mile from the Project Site. Therefore, it is unlikely that construction workers would utilize any parks and recreational facilities near the Project during Project construction.

As shown in Figure IV.I.5-1 on page IV.I.5-12, there are no parks or recreational facilities adjacent to the Project Site along Vine Street. 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, nor interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity. As described in Section IV.J, Transportation, of this Draft EIR, the Project's proposed haul route options from the Project Site would include use of Vine Street and Sunset Boulevard to/from the US-101. The haul route would not travel adjacent to any public park or recreational facility. Therefore, use of this haul route would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site nor interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity.

Thus, based on the above, Project construction would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services, nor would Project construction interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity. **The construction workers associated with the Project would not result in a notable increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration the**

**facilities would occur or be accelerated. Therefore, impacts on parks and recreational facilities during Project construction would be less than significant.**

*(b) Operation*

As discussed above, the Project would introduce approximately 1,034 new residents. This added population could increase the use of existing neighborhood and regional parks or other recreational facilities. Specifically, the Project residents could increase the use of the neighborhood and regional park facilities including Selma, De Longpre, and Carlton Way neighborhood parks and Robert L. Burns and Griffith regional parks.

The Residential Option would include various open space and recreational amenities to serve residents and guests. Specifically, as discussed above, the Residential Option would provide on the ground level a 1,000-square-foot indoor lobby/lounge and 13,350 square feet of landscaped open space, which would include a dog run and a publicly accessible walkway. Level 10 would include a 13,800-square-foot outdoor amenity deck featuring a pool with chaise lounges, seating areas, fire pits, and new trees and shrubs. In addition, interior residential amenity spaces on Level 10 totaling approximately 10,250 square feet would abut the pool amenity deck and may include a fitness center and/or club room. The Residential Option would also provide 16,450 square feet of private residential balconies. In total, the Project's Residential Option would provide 54,850 square feet of open space, exceeding the 54,275 square feet required by LAMC Section 12.21-G.

The Office Option would provide outdoor open space on the ground floor as well as open space and recreational amenities within the new high-rise building. Specifically, on the ground floor, 15,541 square feet of open space would be provided east of the private buffer, and a minimum of 2,100 square feet of this area would be provided for use by residents. On Level 17 of the new building, the Office Option would provide a 4,969-square-foot outdoor deck and 15,821 square feet of indoor amenities for use by office tenants. Such indoor amenities would include an 8,243-square-foot fitness center, 1,283-square-foot yoga room, 3,156-square-foot lounge, and 3,139-square-foot billiard room.

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 1,034 new 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 non-residential



components 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 below, the Project would pay in-lieu parkland fees in accordance with LAMC Sections 12.33 and 17.12. **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, and impacts would be less than significant.**

## (2) Mitigation Measures

Project impacts with regard to increasing the use of existing parks and recreational facilities would be less than significant. Therefore, no mitigation measures are required.

## (3) Level of Significance After Mitigation

Project impacts regard to increasing the use of existing parks and recreational facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact levels remain less than significant.

***Threshold (c): Would 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

This Project does not include on-site public parks or recreational facilities. As discussed above, due to the amount, variety, and availability of the Project's proposed open space and recreational amenities, it is anticipated that Project residents would generally utilize on-site amenities to meet their recreational needs. Furthermore, the Project would meet the applicable requirements set forth in the LAMC with regard to the provision and/or funding of parks and recreational spaces. **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, and impacts would be less than significant.**

## (2) Mitigation Measures

Project impacts with regard to including or requiring the construction or expansion of recreational facilities would be less than significant. Therefore, no mitigation measures are required.

### (3) Level of Significance After Mitigation

Project impacts regard to including or requiring the construction or expansion of recreational facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact levels remain less than significant.

## **e. Cumulative Impacts**

### (1) Impact Analysis

Cumulative growth in the greater Project area through 2027 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 102 related projects are located in the vicinity of the Project Site. As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 102 is a conservative assumption, as some of the related projects may not be built out by 2027 (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 102 are fully built out by 2027, unless otherwise noted. In addition, Related Project No. 103, 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 2027, well before the Community Plan Update's horizon year. Moreover, 2027 is a similar projected buildout year as many of the 102 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 Community Plan Update upon its adoption.

For this analysis, a 2-mile radius is chosen as the geographic scope. As shown in Figure III-1 in Section III, Environmental Setting, of this Draft EIR, a majority of the identified related projects and ambient growth projections fall within a 2-mile radius of the Project Site. 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 PRP. Development of the related projects would exacerbate the Community Plan Area's deficiency in parkland per the PRP's standards, with the exception of the Hollywood Central Park (Related Project No. 99), which, if approved and constructed, would make a substantial positive contribution toward meeting these goals. Notwithstanding, as previously indicated, the standards set

forth in the PRP are Citywide goals and are not intended to be requirements for individual development projects. However, as with the Project, the related projects 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 set forth by the LAMC.

**Based on compliance with these regulatory requirements, 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 with regard to parks and recreational facilities would be less than significant with compliance with regulatory requirements. Therefore, no mitigation measures are required.

## (3) Level of Significance After Mitigation

Cumulative impacts related to parks and recreational facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact levels remain less than significant.