

## **IV. Environmental Impact Analysis**

---

### **F.4 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 (DRP). The analysis identifies and describes the existing parks and recreational facilities in the Project Site vicinity and focuses on whether existing facilities are sufficient to accommodate the growth that could be potentially generated by the Project. The analysis also evaluates the Project’s consistency with applicable City goals and regulatory requirements that address parks and recreation. This analysis is based, in part, on information provided by the DRP, which is included in Appendix H 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 in 1971. 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 DRP 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 DRP.

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) City of Los Angeles General Plan Framework 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 DRP to "[r]e-evaluate the current park standards and develop modified standards which recognize urban parks, including multi-level facilities, smaller sites, more intense use of land, public/private partnerships and so on." In addition, Policy 9.23.8 instructs the DRP to "[p]repare an update of the General Plan Public Facilities and Services Element based on the new Los Angeles Department of Recreation and Parks standards by 2005."

### *(c) City of Los Angeles General Plan Open Space Element*

The City's General Plan 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 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

---

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

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 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.<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
- 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.<sup>6</sup> Additional citywide workshops were held beginning in September 2017, October 2017, and February 2018.<sup>7</sup>

---

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

<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=ccfi.viewrecord&cfnumber=96-1358>, accessed December 27, 2018.*

<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, City of Los Angeles' General Plan Update, Open Space Working Group Summary, August 2017.*

<sup>7</sup> *City of Los Angeles Planning Department, OurLA2040, Past Events, [www.ourla2040.org/past-events](http://www.ourla2040.org/past-events), accessed February 20, 2019.*

Until approval of the pending updates to the Open Space Element, the DRP 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>8</sup> The guidelines of the Public Recreation Plan are described below.

*(d) Public Recreation Plan*

Originally adopted in 1980 by the Los Angeles 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 DRP on the basis of the service radius within residential areas throughout the City. The recommended service levels for both

---

<sup>8</sup> *Email communication, Melinda M. Gejer, City Planning Associate, Planning, Construction and Maintenance Branch, Department of Recreation and Parks, October 24, 2017.*

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.

*(e) Citywide Community Needs Assessment*

In 2009, the DRP 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>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 set forth in Section 17.12 of the LAMC and update the Public

---

<sup>9</sup> *City of Los Angeles Department of Recreation and Parks, Final Report of the Citywide Community Needs Assessment, 2009.*

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>

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 1 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>11</sup> The willingness to travel farther to a park or recreational facility is in part due to the increased accessibility of public transit, as it is now easy and convenient for people to access parks farther than 0.5 mile from their place of residence.<sup>12</sup>

Furthermore, following the Assessment, the City initiated the 50 Parks Initiative to increase the number of parks and facilities, with a specific focus on densely populated neighborhoods and communities that lack sufficient open space and recreational services.<sup>13</sup> As of 2017, according to the Department of City Planning, 39 parks have been completed.<sup>14</sup>

*(f) City of Los Angeles Health and Wellness Element/Plan for a Healthy Los Angeles<sup>15</sup>*

In March 2015, the City adopted the Plan for a Healthy Los Angeles as the Health and Wellness Element of the General Plan. This plan elevates existing health-oriented policies in the General Plan and, where policy gaps exist, creates new policies to reinforce the City's goal of creating healthy, vibrant communities. With a focus on public health and safety, the plan serves as a guide for addressing quality-of-life issues, such as safe

---

<sup>10</sup> Los Angeles Department of Recreation and Parks, *Final Report of the Citywide Community Needs Assessment, 2009*.

<sup>11</sup> Los Angeles Department of Recreation and Parks, *Final Report of the Citywide Community Needs Assessment, 2009*.

<sup>12</sup> City of Los Angeles Department of Recreation and Parks, *Final Report of the Citywide Community Needs Assessment, 2009*.

<sup>13</sup> City of Los Angeles Department of Recreation and Parks, *50 Parks Initiative*, [www.laparks.org/50parks](http://www.laparks.org/50parks), accessed December 8, 2017.

<sup>14</sup> City of Los Angeles Department of City Planning, *OurLA2040, Open Space Element Discussion Paper, 2017*.

<sup>15</sup> City of Los Angeles Department of City Planning, *Plan for a Healthy Los Angeles, A Health and Wellness Element of the General Plan, March 2015*.

neighborhoods, a clean environment, access to health services, affordable housing, healthy and sustainably produced food, and the opportunity to thrive. This plan identifies new policies and potential programs to create healthier neighborhoods by working toward seven goals: (1) Los Angeles, a Leader in Health and Equity; (2) A City Built for Health; (3) Bountiful Parks and Open Spaces; (4) Food that Nourishes the Body, Soul, and Environment; (5) An Environment Where Life Thrives; (6) Lifelong Opportunities for Learning and Prosperity; and (7) Safe and Just Neighborhoods.

As such, this plan highlights the importance of parks and open spaces through the following objectives:

- 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.

Although this plan includes an objective to reach a standard of 3 acres of neighborhood and community park space per 1,000 residents (excluding regional parks and open space), the DRP is operating under the guidance and standards of the Public Recreation Plan, previously described.<sup>16</sup>

---

<sup>16</sup> *Email communication, Melinda M. Gejer, City Planning Associate, Planning, Construction and Maintenance Branch, Department of Recreation and Parks, October 24, 2017.*

*(g) 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 6 feet in any direction.

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.

In September 2016, the City adopted a new Park Fee Ordinance (Ordinance).<sup>17</sup> The aim of the Ordinance is to increase the opportunities for park space creation and expand the Quimby 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 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 is January 11, 2017. The 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 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

---

<sup>17</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.*

the park fees set forth in the Ordinance. The Project's entitlement applications and its vesting tentative map application were deemed complete by the Department of City Planning prior to the Ordinance becoming effective. 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's applications were deemed complete. These provisions are summarized below.

The former 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, the former provisions of LAMC Section 17.12 applicable to the Project allow 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 LAMC Section 17.12 include, in part, swimming pools and spas (when the spas are an integral part of a pool complex) and children's play areas with playground equipment comparable in type and quality to those found in City parks. Furthermore, the recreational areas proposed as part of a project must meet the following standards in order to be credited against the requirement for land dedication: (1) each facility is available for use by all residents of a project; and (2) the area and the facilities satisfy the park and recreation needs of a project so as to reduce that project's need for public park and recreation facilities. In addition, former LAMC 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 the former LAMC Section 17.12 described above, the former 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 the former LAMC Section 17.12.

In addition, pursuant to LAMC Section 21.10.3(a)(1) (Dwelling Unit Construction Tax), the City imposes a tax of \$200 per dwelling unit on the construction of all new dwelling units and modification of existing dwelling units to be paid to the Department of Building and Safety. These taxes are placed into a "Park and Recreational Sites and

Facilities Fund” to be used exclusively for the acquisition and development of park and recreational sites. 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.

*(h) Hollywood Community Plan*

As discussed in Section IV.D, 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 (2 acres per 1,000 persons for neighborhood parks and 2 acres per 1,000 persons for community parks). 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. The Hollywood 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 0.76 acre per 1,000 residents.<sup>18</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 1.8 miles from the Project Site, provides hiking opportunities and a children's play area.<sup>19</sup> The 4,511-acre Griffith Park, one of the largest municipal parks in North America and the largest historic landmark in the City, offers numerous family attractions, an assortment of educational and cultural institutions, and more than 70 miles of hiking and horseback riding trails.<sup>20</sup> Bronson Canyon, which is located within Griffith Park, also offers picnic areas and hiking trails.<sup>21</sup>

## b. Existing Conditions

### (1) Local Area

As previously stated, the DRP is responsible for the establishment, operation, and maintenance of parks and recreational facilities within the City. Currently, the DRP maintains and operates more than 444 sites for recreational use, which include 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,

---

<sup>18</sup> *Written correspondence from Darryl Ford, Senior Management Analyst, Planning, Construction and Maintenance Branch, Department of Recreation and Parks, April 26, 2018.*

<sup>19</sup> *City of Los Angeles, Department of Recreation and Parks, Runyon Canyon Park, [www.laparks.org/park/runyon-canyon](http://www.laparks.org/park/runyon-canyon), accessed February 20, 2019.*

<sup>20</sup> *City of Los Angeles, Department of Recreation and Parks, Griffith Park, Map & Guide, 2016.*

<sup>21</sup> *City of Los Angeles Department of Recreation and Parks, Bronson Canyon, [www.laparks.org/park/bronson-canyon](http://www.laparks.org/park/bronson-canyon), accessed February 20, 2019.*

9 dog parks, 187 summer youth camps, Venice Beach, Cabrillo Marine Aquarium, 13 lakes, and hundreds of programs for youth, adults, and seniors. The DRP 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>22</sup>

As shown in Figure IV.F.4-1 on page IV.F.4-13, there are a number of parks and recreational facilities located within an approximate 2-mile radius of the Project Site. Table IV.F.4-1 on page IV.F.4-14 lists the size, type of park, amenities, and approximate distances from the Project Site for these public parks and recreational facilities. Consistent with the *L.A. CEQA Thresholds Guide*, a 2-mile radius is evaluated as it is anticipated that patrons of parks and recreational facilities in the Project Site vicinity would reside within that distance.

While the DRP is in the process of implementing the 50 Parks Initiative, none of the planned parks will be sited within the 2-mile radius of the Project Site.<sup>23</sup> However, the City is investigating the feasibility of constructing a “cap park” over the Hollywood Freeway (US-101). This project, known as Hollywood Central Park, would create a 14.35-acre park that spans above the Hollywood Freeway between Santa Monica Boulevard and Hollywood Boulevard, approximately 0.46 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 Related Project No. 41 for purposes of assessing cumulative impacts throughout this Draft EIR, as noted in Section III, Environmental Setting, of this Draft EIR.

## (2) Project Site

As described in Section II, Project Description, of this Draft EIR, the Project Site is an approximately 1.1-acre site currently occupied by six buildings containing approximately 61,816 square feet of floor area, and consisting of warehouse, office, and commercial uses, as well as surface parking. Landscaping within the Project Site is limited, with one lemon gum tree located toward the southeastern portion of the Project Site. Beyond the property line are three ficus and three evergreen pear street trees located along Selma and Argyle Avenues. There are no parks or recreational facilities located on-site.

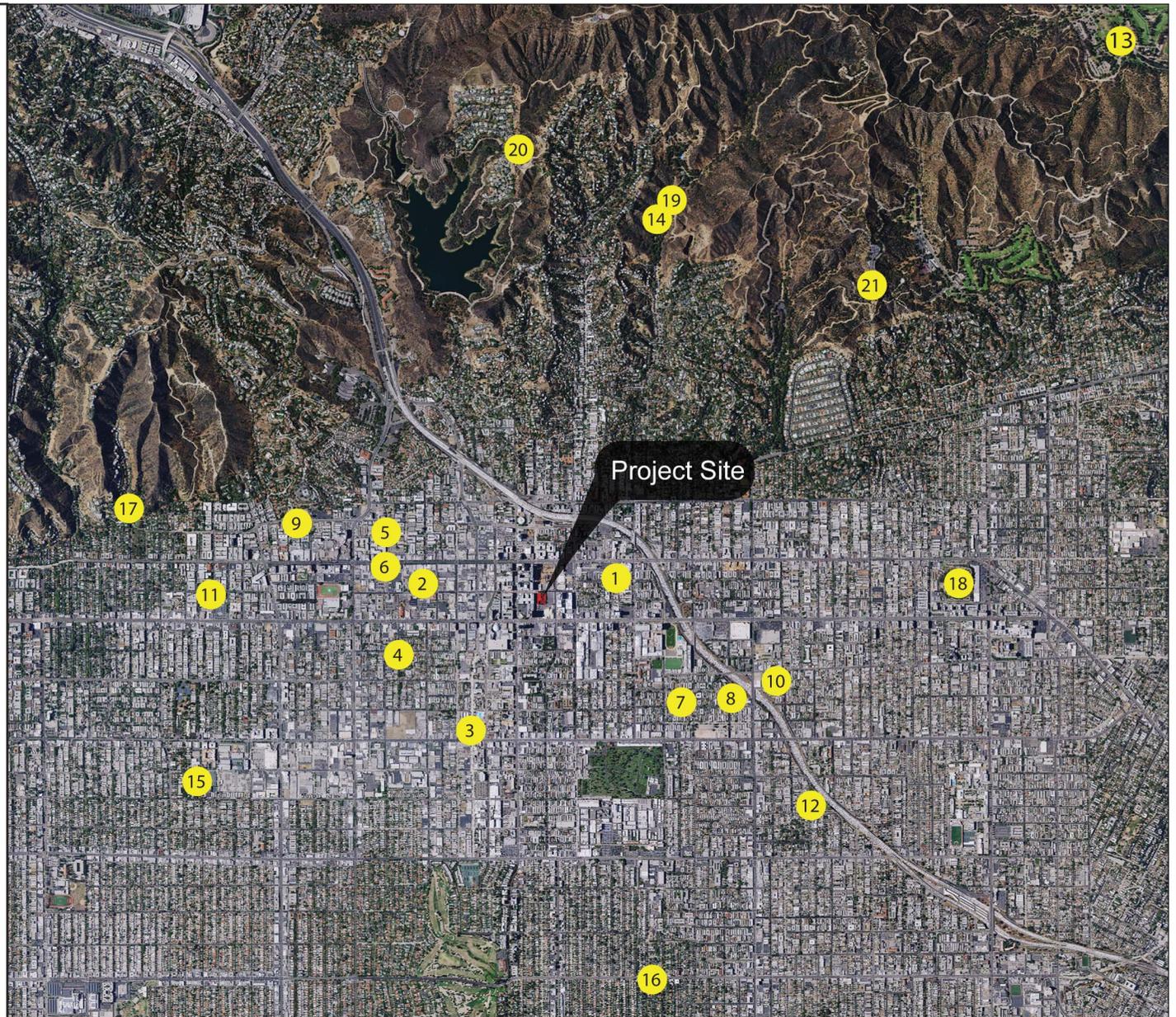
---

<sup>22</sup> *Los Angeles Department of Recreation and Parks, Who We Are, www.laparks.org/department/who-we-are, accessed February 20, 2019.*

<sup>23</sup> *Written correspondence from Darryl Ford, Senior Management Analyst, Planning, Construction and Maintenance Branch, Department of Recreation and Parks, April 26, 2018*

**LEGEND**

- 1 **Carlton Way Park**  
5927 Carlton Way, Los Angeles, CA 90028
- 2 **Selma Park**  
6567 Selma Ave., Los Angeles, CA 90028
- 3 **Hollywood Pool & Recreation Center**  
1122 Cole Ave., Los Angeles, CA 90038
- 4 **De Longpre Park**  
1350 N. Cherokee Ave., Los Angeles, CA 90028
- 5 **Yucca Park & Community Center**  
6671 Yucca St., Los Angeles, CA 90028
- 6 **Las Palmas Senior Citizen Center**  
1820 Las Palmas Ave., Los Angeles, CA 90028
- 7 **Selly Rodriguez Park**  
5707 Lexington Ave., Los Angeles, CA 90038
- 8 **Lexington Avenue Pocket Park**  
5523 Lexington Ave., Los Angeles, CA 90038
- 9 **Dorothy & Benjamin Smith Park**  
7020 Franklin Ave., Los Angeles, CA 90028
- 10 **La Mirada Park**  
5401 La Mirada Ave., Los Angeles, CA 90029
- 11 **Runyon Canyon Park & Dog Park**  
2000 N. Fuller Ave., Los Angeles, CA 90046
- 12 **Lemon Grove Recreation Center**  
4959 Lemon Grove Ave., Los Angeles, CA 90029
- 13 **Griffith Park**  
4730 Crystal Springs Dr., Los Angeles, CA 90027
- 14 **Bronson Canyon**  
3200 Canyon Rd., Los Angeles, CA 90068
- 15 **Poinsettia Recreation Center**  
7341 Willoughby Ave., Los Angeles, CA 90046
- 16 **Robert L. Burns Park**  
4900 Beverly Blvd., Los Angeles, CA 90004
- 17 **Wattles Garden Park**  
1824 N. Curson Ave., Hollywood, CA 90046
- 18 **Barnsdall Art Park**  
4800 Hollywood Blvd., Los Angeles, CA 90027
- 19 **Hollywood Girl's Camp**  
3200 Canyon Dr., Los Angeles, CA 90068
- 20 **Lake Hollywood Park**  
3160 Canyon Lake Dr., Los Angeles, CA 90068
- 21 **Griffith Observatory**  
2800 E. Observatory Rd., Los Angeles, CA 90027



**Figure IV.F.4-1**

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

Source: Apple Maps, 2017; Eyestone Environmental, 2017.

**Table IV.F.4-1  
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 (miles)</b>	<b>Type of Park/ Recreational Facilities</b>	<b>Amenities</b>
1	<b>Carlton Way Park</b> 5927 Carlton Way Los Angeles, CA 90028	0.35	Park	Children's Play Area, Fitness Equipment
2	<b>Selma Park</b> 6567 Selma Ave. Los Angeles, CA 90028	0.46	Park	Children's Play Area, Benches, Outdoor Tables
3	<b>Hollywood Pool &amp; Recreation Center</b> 1122 Cole Ave. Los Angeles, CA 90038	0.58	Pool, Recreation Center	Youth Sports and Lessons, Recreational and Tutoring Programs, Pool, Auditorium, Basketball Courts, Children's Play Area, Community Room, Kitchen, Multipurpose Sports Field
4	<b>De Longpre Park</b> 1350 N. Cherokee Ave. Los Angeles, CA 90028	0.65	Park	Children's Play Area, Benches
5	<b>Yucca Park &amp; Community Center</b> 6671 Yucca St. Hollywood, CA 90028	0.68	Park, Community Center	Youth Sports, After School Club, Youth Education Programs, Computer Lab, Basketball Courts, Soccer Field, Synthetic Field, Children's Play Area, Picnic Tables, Benches
6	<b>Las Palmas Senior Citizen Center</b> 1820 Las Palmas Ave. Los Angeles, CA 90028	0.74	Senior Citizen Center	Exercise and Recreational Programs, Computer Lab, Auditorium, Community Room, Stage
7	<b>Seily Rodriguez Park</b> 5707 Lexington Ave. Hollywood, CA 90038	0.76	Park	Basketball Courts, Children's Play Area, Picnic Tables, Benches
8	<b>Lexington Avenue Pocket Park</b> 5523 Lexington Ave. Los Angeles, CA 90038	0.92	Park	Children's Play Area, Benches
9	<b>Dorothy &amp; Benjamin Smith Park</b> 7020 Franklin Ave. Los Angeles, CA 90028	1.05	Park	Benches, Sitting Area
10	<b>La Mirada Park</b> 5401 La Mirada Ave. Los Angeles, CA 90029	1.09	Park	Outdoor Fitness Equipment, Picnic Tables

**Table IV.F.4-1 (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 (miles)</b>	<b>Type of Park/ Recreational Facilities</b>	<b>Amenities</b>
11	<b>Runyon Canyon Park</b> 2000 N. Fuller Ave. Los Angeles, CA 90046	1.45	Park	Hiking Trail, Children's Play Area
12	<b>Lemon Grove Recreation Center</b> 4959 Lemon Grove Ave. Los Angeles, CA 90029	1.49	Recreation Center	Youth Sports, After School Club, Recreational Programs, Auditorium, Barbecue Pits, Baseball Diamond, Batting Cages, Basketball Courts, Children's Play Area, Picnic Tables, Jogging Path, Outdoor Fitness Equipment, Stage
13	<b>Griffith Park</b> 4730 Crystal Springs Dr. Los Angeles, CA 90027	1.50 <sup>c</sup>	Park	Children's Play Area, Picnic Tables, Soccer Field, Tennis Courts, Bike Path, Hiking Trail, Horseback Riding Trail, Pony Rides, Merry-Go-Round
14	<b>Bronson Canyon</b> 3200 Canyon Rd. Los Angeles, CA 90068	1.60	Park	Picnic Tables, Hiking Trail
15	<b>Poinsettia Recreation Center</b> 7341 Willoughby Ave. Los Angeles, CA 90046	1.66	Recreation Center	Youth Sports, After School Club, Recreational Programs, Baseball Diamond, Basketball Courts, Children's Play Area, Handball Courts, Tennis Courts, Outdoor Fitness Equipment, Kitchen, Stage
16	<b>Robert L. Burns Park</b> 4900 Beverly Blvd. Los Angeles, CA 90004	1.71	Park	Children's Play Area, Picnic Tables
17	<b>Wattles Garden Park</b> 1824 N. Curson Ave. Hollywood, CA 90046	1.73	Park	Community Garden, Hiking Trail
18	<b>Barnsdall Art Park</b> 4800 Hollywood Blvd. Los Angeles, CA 90027	1.76	Historic, Park, Museum	Educational Programs and Tours, Barnsdall Art Center, Junior Arts Center Gallery, Hollyhock House Gallery Theatre
19	<b>Hollywood Girl's Camp</b> 3200 Canyon Dr. Los Angeles, CA 90068	1.80	Camp	Educational and Camp Programs

**Table IV.F.4-1 (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 (miles)</b>	<b>Type of Park/ Recreational Facilities</b>	<b>Amenities</b>
20	<b>Lake Hollywood Park</b> 3160 Canyon Lake Dr. Los Angeles, CA 90068	1.91	Park	Children's Play Area, Picnic Tables, Barbecue Pits
21	<b>Griffith Observatory</b> 2800 E. Observatory Rd. Los Angeles, CA 90027	1.93	Historic	Educational Programs

<sup>a</sup> Map numbers correspond with Figure IV.F.4-1 on page IV.F.4-13.

<sup>b</sup> Distances represent approximate bird's eye view distances.

<sup>c</sup> This distance is from the Project Site to a portion of Griffith Park itself and not the listed Griffith Park Visitor Center.

Source: City of Los Angeles, Department of Recreation and Parks, Facility Map Locator, [www.laparks.org/parks](http://www.laparks.org/parks), accessed February 20, 2019; City of Los Angeles, Department of Recreation and Parks, Griffith Park, [www.laparks.org/park/griffith](http://www.laparks.org/park/griffith), accessed February 20, 2019; City of Los Angeles, Department of Recreation and Parks, Bronson Canyon, [www.laparks.org/park/bronson-canyon](http://www.laparks.org/park/bronson-canyon), accessed February 20, 2019; City of Los Angeles, Department of Recreation and Parks, Camp Hollywoodland, [www.laparks.org/camp/camp-hollywoodland](http://www.laparks.org/camp/camp-hollywoodland), accessed February 20, 2019; Written correspondence from Darryl Ford, Senior Management Analyst I, Planning, Construction, and Maintenance Branch, Department of Recreation and Parks, April 26, 2018; and Google Maps, 2019.

### 3. Project Impacts

#### a. Thresholds of Significance

##### (1) State CEQA Guidelines Appendix G

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to public facilities such as parks, as well as recreation, if it would:

**Threshold (a): Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks.**

***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.***

## (2) 2006 L.A. CEQA Thresholds Guide

The *L.A. CEQA Thresholds Guide* states that the determination of significance shall be made on a case-by-case basis, considering the following criteria to evaluate impacts to parks and recreation facilities:

- 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).

In assessing impacts related to parks and recreation in this section, the City will use Appendix G as the thresholds of significance. The criteria identified above from the *L.A. CEQA Thresholds Guide* will be used where applicable and relevant to assist in analyzing the Appendix G thresholds.

### **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 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 DRP 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. Analysis of Project Impacts

### (1) Project Design Features

No specific project design features beyond the open space and recreation features described in Section II, Project Description, of this Draft EIR are proposed with regard to parks and recreation.

### (2) Project Impacts

***Threshold (a): Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?***

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

As discussed above, the Public Recreation Plan's desired 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 and are not intended to be requirements for individual development projects. In addition, based on the 2009 Citywide Community Needs Assessment, the expectation as to how far people are willing to travel to parks and recreational facilities has increased since the Public Recreation Plan was adopted in 1980. Furthermore, the Community Plan ratio does not include regional parks such as Runyon Canyon Park and Griffith Park, which are located within the Community Plan Area. These larger regional parks provide additional recreational opportunities to residents of the area and help to achieve the established standards in the Community Plan.

Based on the estimated 671 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<sup>24</sup> and

---

<sup>24</sup>  $671 \text{ Project residents} \times (2 \text{ acres}/1,000 \text{ residents}) = 1.3 \text{ acres of neighborhood parkland}$

approximately 0.7 acre to meet the Public Recreation Plan's more attainable short- and intermediate-range standard of 1 acre per 1,000 residents.<sup>25</sup> 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<sup>26</sup> and approximately 0.7 acre to meet the Public Recreation Plan's more attainable short- and intermediate-range standard of 1 acre per 1,000 residents.<sup>27</sup>

The Project would include a minimum of approximately 0.39 acre (16,865 square feet) of common open space, which would consist of a variety of open space features and recreational amenities to serve residents' recreational needs. While the Project's 0.39 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, as previously stated, the Public Recreation Plan parkland standards are Citywide goals and do not constitute requirements for individual development projects. However, due to the Project's inclusion of common open space and recreational opportunities, the use of existing community parks in the area would be minimized. 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. 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, 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 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.

---

<sup>25</sup>  $671 \text{ Project residents} \times (1 \text{ acre}/1,000 \text{ residents}) = 0.7 \text{ acre of neighborhood parkland}$

<sup>26</sup>  $671 \text{ Project residents} \times (2 \text{ acres}/1,000 \text{ residents}) = 1.3 \text{ acres of community parkland}$

<sup>27</sup>  $671 \text{ Project residents} \times (1 \text{ acre}/1,000 \text{ residents}) = 0.7 \text{ acre of community parkland}$

As described above, LAMC Section 12.21-G requires that residential developments containing six or more dwelling units on a lot provide a specified 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 28,450 square feet of usable open space, as shown in Table IV.F.4-2 on page IV.F.4-25 later in the section. The Project would provide a minimum of approximately 28,665 square feet of usable open space consisting of common open space (e.g., club house, lounge/lobby, courtyard) and private open space (balconies) for its residents.<sup>28</sup> 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. Therefore, the Project would be required to provide 14,225 square feet of common open space. The Project would exceed this requirement via the provision of a minimum of approximately 16,865 square feet of common open space, which would constitute approximately 59 percent of the total required usable open space.

In addition, 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 Project would be required to provide a minimum of 3,556 square feet of landscaped common open space. The Project would meet this requirement by landscaping 25 percent of the planted common area within the Levels 1, 2, and 7, meeting the requirement for the Project. Therefore, the Project would be consistent with this provision of the LAMC. Furthermore, LAMC Section 12.21-G requires one 24-inch box tree per four dwelling units. Based on the 276 dwelling units proposed by the Project, 69 trees would be required. As the Project would provide a total of 69 trees within the Project Site and on the ground floor along Argyle Avenue and Selma Avenue, the Project would be consistent with this provision of the LAMC.

LAMC Section 12.21-G also 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 will include 6,926 square feet of qualifying interior open space under the retail/restaurant option, and 7,046 square feet of qualifying interior open space under the grocery store option, which constitute approximately 24.3 percent and 24.8 percent of the total required open space for the Project, respectively. Therefore, the

---

<sup>28</sup> *The numbers presented are for the retail/restaurant option. The grocery store option would provide 28,785 square feet of open space, with 16,985 of common open space. The additional common open space would be located on Level 1.*

Project would be consistent with LAMC provisions regarding allowable indoor common open space.

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. The guarantee of payment of fees is to be to the satisfaction of the Department of Recreation and Parks. 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 32 percent 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 approximately 15,489 square feet 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 Hollywood 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 and urbanized area, the Project would provide a feasible use of recreational sites and facilities for its residents. The Project would also provide open space to residents with amenities that, as addressed by the Hollywood Community Plan, would be tailored to the social, economic, 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. As such, impacts with respect to consistency with the Hollywood Community Plan would be less than significant.

*(d) Conclusion*

**Based on the analysis above, the Project would be generally consistent with the Public Recreation Plan, LAMC, and the Hollywood Community Plan. The Project would not result in the need for new or physically altered parks and recreation facilities, the construction of which would cause significant environmental impacts,**

**in order to maintain acceptable service ratios and standards. Impacts would be less than significant and no mitigation measures are required.**

***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?***

*(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. 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 (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). As shown in Table IV.F.4-1 on page IV.F.4-14, the closest park facilities to the Project Site are limited to Carlton Way Park (5927 Carlton Way), approximately 0.35 mile northeast of the Project Site, and Selma Park (6567 Selma Avenue), approximately 0.46 mile northwest of the Project Site; all other parks identified in Table IV.F.4-1 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.F.4-1 on page IV.F.4-13, there are no parks or recreational facilities adjacent to the Project Site along Argyle Avenue or Selma 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, 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.G, Transportation, of this Draft EIR, the

Project's proposed haul route from the Project Site would include use of Argyle Avenue and Gower Street 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.

**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. Thus, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities during construction such that substantial physical deterioration of the facilities would occur or be accelerated. As such, impacts on parks and recreational facilities during Project construction would be less than significant, and mitigation measures are not required.**

*(b) Operation*

As described in Section II, Project Description, of this Draft EIR, the Project Site is currently occupied by approximately 61,816 square feet of existing uses, including six buildings and associated surface parking. The Project would construct a mixed-use development with 276 residential units and approximately 24,000 square feet of neighborhood-serving commercial retail and restaurant uses under the Retail/Restaurant Option. Alternatively, under the Grocery Store Option, the Project would construct an approximately 27,000 square-foot grocery store in lieu of the proposed retail and restaurant uses. As no housing currently exists on the Project Site, there are no residents on the Project Site that generate an existing demand for parks and recreational facilities in the Project vicinity. The existing commercial uses on the Project Site currently generate approximately 155 employees.<sup>29</sup> Under both options, the Project's new residential units would introduce an estimated residential population of approximately 671 persons, based on the most recent estimated household size of 2.43 persons per unit for multi-family

---

<sup>29</sup> *Based on Los Angeles Unified School District, 2016 Developer Fee Justification Study, March 2017. For existing commercial uses, the employee generation rate for "Neighborhood Shopping Center" (i.e., 0.00271 employee per square foot) is applied. For existing office uses, the employee generation rate for "Standard Commercial Office" (i.e., 0.00479 employee per square foot) is applied. For existing warehouse uses, the employee generation rate for "Industrial Parks" (i.e., 0.00135 employee per square foot) is applied.*

housing units in the City of Los Angeles area.<sup>30</sup> The population increase associated with the Project would generate additional demand for parks and recreational facilities in the Project vicinity.

The Project would include various open space and recreational amenities to serve residents and guests. Specifically, as discussed in Section II, Project Description, of this Draft EIR, the Project would include a lobby/lounge, clubhouse, and outdoor patio area located on the ground floor, and additional clubhouse open space area at the mezzanine level. On the second level, a pool and courtyard would be provided, along with a second clubhouse area and landscaped rear and side yard setback areas. Private balconies would be provided for the majority of units in the Project.

As shown in Table IV.F.4-2 on page IV.F.4-25, the Project would provide a minimum of 28,665 square feet of open space, consisting of 16,865 square feet of common open space and 11,800 square feet of private open space in the form of residential balconies.<sup>31</sup> In total, the Project would provide a minimum of 28,665 square feet of open space, exceeding the 28,450 square feet required by LAMC Section 12.21-G.

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 671 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 are estimated to generate approximately 65 employees under the Retail/Restaurant Option or approximately 73 employees under the Grocery Store Option.<sup>32</sup> As compared to existing uses on the Project Site, which generate approximately 155 employees, the Project's non-residential components would result in a net reduction in employees. The employees generated by

---

<sup>30</sup> Based on a 2.43 persons per household rate for multi-family units based on the 2016 American Community Survey 5-Year Average Estimate (2012–2016) per correspondence with Jack Tsao, Los Angeles Department of City Planning Demographics Unit, March 8, 2018.

<sup>31</sup> The numbers presented are for the retail/restaurant option. The grocery store option would provide 28,785 square feet of open space, with 16,985 square feet of common open space. The additional common open space would be located on Level 1.

<sup>32</sup> Based on Los Angeles Unified School District, 2016 Developer Fee Justification Study, March 2017. For proposed grocery store uses, the employee generation rate for "Neighborhood Shopping Center" (i.e., 0.00271 employee per square foot) is applied.

**Table IV.F.4-2**  
**Section 12.21-G LAMC—Open Space Required and Provided by the Project**

<b>Open Space Requirement</b>	<b>Quantity</b>	<b>Requirement per Unit</b>	<b>Total Required</b>
Studio (with less than 3 habitable rooms)	46 du	100 sf per du	4,600 sf
1-bed (with less than 3 habitable rooms)	196 du	100 sf per du	19,600 sf
2-bed (with 3 habitable rooms)	34 du	125 sf per du	4,250 sf
<b>Total Required</b>			<b>28,450 sf</b>
<b>Open Space Type</b>			<b>Minimum Provided<sup>a</sup></b>
<b>Common Open Space</b>			
Level 1			4,543 sf
Level 2			10,746 sf
Level 7			1,576 sf
<i>Common Open Space Subtotal</i>			<i>16,865 sf</i> <i>(0.39 acre)</i>
<b>Private Open Space</b>			
Residential Balconies (236 units)			11,800 sf
<i>Private Open Space Subtotal</i>			<i>11,800 sf</i> <i>(0.27 acre)</i>
<b>Total Open Space Provided</b>			<b>28,665 sf</b> <b>(0.66 acre)</b>
<hr/> <i>du = dwelling units</i> <i>sf = square feet</i> <sup>a</sup> <i>The numbers presented are for the retail/restaurant option. The grocery store option would provide 28,785 square feet of open space, with 16,985 square feet of common open space. The additional common open space would be located on Level 1.</i> <i>Source: Togawa Smith Martin, 2018.</i>			

the Project would result in a negligible indirect demand for parks and recreational facilities, which would be off-set by the net reduction in employees attributed to the removal of the Project Site's existing uses. As discussed above, the Project employees could potentially spend their lunch breaks at the parks and recreational facilities near the Project Site, specifically Carlton Way Park (5927 Carlton Way), approximately 0.35 mile northeast of the Project Site, and Selma Park (6567 Selma Avenue), approximately 0.46 mile northwest of the Project Site. However, employees would not be expected to 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). Rather, it is anticipated that Project employees would utilize on-site open space, resulting in a negligible demand for surrounding parks and recreational facilities. 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 significantly increase the demand for off-site public parks and recreational facilities.

Based on the above, 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 to meet their recreational needs. Furthermore, the Project would meet the applicable requirements set forth in LAMC Sections 12.21, 17.12, 12.33, and 21.10.3(a)(1) of the LAMC regarding the provision of useable open space and the dedication of parkland or the payment of in-lieu fees. The Project would not meet the parkland provision goals set forth in the Public Recreation Plan. However, as previously indicated, these are Citywide goals and are not intended to be requirements for individual development projects. Furthermore, through compliance with the above-referenced LAMC 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. **Thus, the Project would be adequately accommodated by existing or planned facilities, and 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 facilities would occur or be accelerated. Therefore, impacts to parks and recreational facilities would be less than significant and mitigation measures are not required.**

***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?***

As detailed above in the discussions under Thresholds (a) and (b), 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.**

## 4. Cumulative Impacts

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 108 related projects are located in the vicinity of the Project Site. In addition, Related Project No. 109, the Hollywood Community Plan Update, is identified.

As discussed in Section III, Environmental Setting, of this Draft EIR, the projected growth reflected by Related Project Nos. 1 through 108 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 108 are fully built out by 2023, unless otherwise noted. Related Project No. 109 is the Hollywood Community Plan Update, which 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 Community Plan Update's horizon year. Moreover, 2023 is a similar projected buildout year as many of the 108 related development 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.

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 noted above, the Hollywood Community Plan area is currently underserved when considering the desired parkland standards provided in the Public Recreation Plan. As the population continues to grow in the Project Site vicinity, increased demand would lower the existing parkland to population ratio if new facilities, such as the Hollywood Central Park (Related Project No. 41), are not constructed.

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 areas's deficiency in parkland per the Public Recreation Plan's standards, with the exception of the Hollywood Central Park (Related Project No. 41), 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. In addition, future

parks planned for development under the City's 50 Parks Initiative may not necessarily be within the service radius of the related projects. 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. Furthermore, 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 the DRP. 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) (pursuant to the Ordinance), as applicable. 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.

## **5. Mitigation Measures**

Project-level and 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.

## **6. Level of Significance After Mitigation**

Project-level and cumulative impacts related to parks and recreational facilities would be less than significant.