

IV. Environmental Impact Analysis

K.4 Public Services—Parks and Recreation

1. Introduction

This section of the Draft EIR addresses the Project's potential impacts on public parks and recreation facilities administered by the City of Los Angeles (City) Department of Recreation and Parks (DRP) located within a 2-mile radius of the Project Site. The analysis identifies and describes the existing parks and recreational facilities located within a 2-mile radius of the Project Site and focuses on whether existing facilities are sufficient to accommodate the Project. This analysis is based, in part, on information provided by DRP, which is included in Appendix O of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) State

The Quimby Act codified in Government Code Section 66477(a)(2) was enacted in 1965 in an effort to promote the availability of park and open space areas in California and respond to the increased rate of urbanization and need for open space. 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. Within the City of the Los Angeles, the Quimby Act is implemented via Los Angeles Municipal Code (LAMC) Section 17.12, which 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. In addition, LAMC Section 12.33 extends these requirements to all multi-family residential use projects that require a change in zoning. 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. As discussed further below, effective January 11, 2017, the City's new Park Fee Ordinance amends sections of the LAMC that pertain to implementation of the Quimby Act.

(2) Local

(a) City of Los Angeles Charter

Section 500 of the City of Los Angeles Charter established the Department of Recreation and Parks 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 Department of Recreation and Parks.

With regard to the control and management of recreation and park lands, Section 594(c) of the City of Los Angeles 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 Framework Element

The City's General Plan Framework Element (adopted in December 1996 and readopted in August 2001) sets forth general guidance regarding land use issues for the entire City of Los Angeles and defines citywide policies regarding land use, including park and open space policies that address recreational uses throughout the City. Policy 9.23.5 of the Framework Element's Infrastructure and Public Services Chapter directs the Department of Recreation and Parks 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."

(c) City of Los Angeles Open Space Element

The City's General Plan Open Space Element was prepared in June 1973 to provide an official guide for the identification, preservation, conservation, and acquisition of open space in the City. The City's General Plan Open Space Element 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 the protection of individuals from the misuses of these lands. In addition, the Open Space Element 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.¹

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.^{2,3} During April 2017 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. The following key preliminary themes were identified by the Open Space Working Group:⁴

- 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 who will provide feedback that will be incorporated into the guiding principles for the Open Space Element. The OurLA2040 group also hosted a series of community workshops as part of their Community Conversations series in late 2017 and early 2018.⁵

Until approval of the pending updates to the Open Space Element, the Department of Recreation and Parks is operating under the guidance of the Public Recreation Plan, a

¹ City of Los Angeles Department of City Planning, *Open Space Plan*, June 1973.

² City Clerk: City of Los Angeles, <https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=96-1358>, accessed October 30, 2020.

³ City of Los Angeles Planning Department, *General Plan Structure, Summary of the General Plan Structure*, Spring 2014.

⁴ City of Los Angeles Planning Department, *OurLA2040, City of Los Angeles' General Plan Update, Open Space Working Group Summary*, August 2017.

⁵ City of Los Angeles Department of City Planning, *OurLA2040, Community Conversations—What We've Heard So Far*, <https://planning.lacity.org/plans-policies/community-plan-update/general-news-item/community-conversations-what-weve-heard-so-0>, accessed November 1, 2020.

portion of the Public Facilities and Services Element of the 1980 City of Los Angeles General Plan.⁶ The guidelines of the Public Recreation Plan are described below.

(d) City of Los Angeles 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.

According to the standard park characteristics identified in the Public Recreation Plan, park facilities are discussed in terms of local parks and regional facilities and their accessibility and service to residents. Local parks include neighborhood and community recreation sites, open space, and "small" parks, which are usually characterized as less than 1 acre in size. 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. Although the ideal size for a neighborhood park is considered to be 10 acres, such parks within the City of Los Angeles are typically 1 to 5 acres in size. 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. According to the Public Recreation Plan, the ideal size for a community park is considered to be 15 to 20 acres. Regional recreational sites and facilities provide specialized recreational facilities that have regional draw.

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 Department of Recreation and Parks on the basis of the service radius within residential areas throughout the City. The desired long-range standard for both neighborhood sites and facilities and community sites and facilities is 2 acres per 1,000 residents. In addition, the recommended service levels for regional

⁶ *Email communication, Melinda M. Gejer, City Planning Associate, Planning, Construction and Maintenance Branch, Department of Recreation and Parks, October 24, 2017.*

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.

(e) Department of Parks and Recreation Strategic Plan 2018–2022⁷

The City of Los Angeles Department of Recreation and Parks' Strategic Plan 2018–2022 (Strategic Plan) is comprised of seven 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. Every goal is accompanied by a specific vision of the park system, followed by outcomes. Under each of these outcomes, specific and actionable objectives are presented, which the Department aims to implement within the next five years.

The City intends to develop new neighborhood parks, particularly in areas of the City that lack adequate open space through acquisition, lease, and/or partnership. According to the Strategic Plan, 55 percent of Angelenos have access to a park within 0.5 mile from their home. The City aims to increase this to 60 percent by 2022 by supporting efforts to increase mobility to parks, and within parks, through new transit services and bicycle infrastructure.

(f) Citywide Community Needs Assessment

In 2009, the Department of Recreation and Parks completed a Citywide Community Needs Assessment. The Citywide Community Needs Assessment examined current and future recreation 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 Citywide Community Needs 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. The Citywide Community Needs 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 Recreation Plan, developing an updated pricing and revenue plan to offset capital and

⁷ City of Los Angeles Department of Recreation and Parks, *Park Proud LA, Strategic Plan 2018–2022*.

operational costs, and implementing a land acquisition strategy involving developer impact agreements based on the standards for open space desired.

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. 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.

After completion of 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.⁸ As of 2017, according to the Department of City Planning, 39 parks have been completed.⁹

(g) City of Los Angeles Health and Wellness Element/Plan for a Healthy Los Angeles¹⁰

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 reinforces existing health-oriented policies in the General Plan and creates new policies to support the City's goal of creating healthy, vibrant communities.

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).

⁸ City of Los Angeles Department of Recreation and Parks, *50 Parks Initiative*, www.laparks.org/50parks, accessed November 1, 2020.

⁹ City of Los Angeles Department of City Planning, *OurLA2040, Open Space Element Discussion Paper*, 2017.

¹⁰ City of Los Angeles Department of City Planning, *Plan for a Healthy Los Angeles*, March 2015.

- 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.

(h) Los Angeles Municipal Code

In September 2016, the City adopted a new Park Fee Ordinance.¹¹ 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, 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 Section 12.26 A.3 of the LAMC prior to the effective date of the Park Fee Ordinance, and/or has an approved vesting tentative map pursuant to Section 17.15 of the LAMC, the application for which has been deemed complete prior to the effect date of the Park Fee Ordinance, shall not be subject to the park fees set forth in the

¹¹ 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.

Ordinance. The Project's entitlement applications, including its vesting tentative map application, were deemed complete on February 22, 2018, subsequent to the Park Fee Ordinance becoming effective. As such, the Project is subject to the park fee provisions of the Park Fee Ordinance. The LAMC provisions, as amended by the Ordinance, are summarized below.

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, picnic tables, benches, children's play areas, ball courts, barbecue 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 of at least 600 square feet for a development of at least 16 dwelling units may qualify as common open space but cannot constitute more than 25 percent of the total required usable open space. Private open space is defined as area which is contiguous to and immediately accessible from an individual dwelling unit and which contains a minimum of 50 square feet, of which no more than 50 square feet per dwelling unit is counted toward the total required usable open space. Private open space may not have a dimension of less than six feet in any direction.

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

Pursuant to LAMC Section 12.33, subdivision projects consisting of more than 50 residential units are subject to a Quimby in-lieu fee, while all other residential projects are subject to a park mitigation fee. LAMC Section 12.33 requires all new subdivisions containing residential dwelling units and/or joint living and work quarters to dedicate land, pay a fee, or provide a combination of land dedication and fee payment for the purpose of acquiring, expanding, and improving park and recreational facilities for new residents. Specifically, residential subdivision projects that contain more than 50 dwelling units are required to participate in an early consultation with the Department of Recreation and Parks and the Department of City Planning and may be required to dedicate land, make park improvements, pay a park fee or provide a combination of land dedication and park fee payment. LAMC Section 12.33 states that the area of parkland within a subdivision that is required to be dedicated is determined by the net new dwelling units in the project, average number of occupants per dwelling unit, and a park service factor determined by the

Department of Recreation and Parks. Park fees are calculated per new dwelling unit to be constructed and must be paid prior to the approval of the final subdivision map. LAMC Section 12.33 also allows credits toward or in lieu of park fees to be earned through public land dedication or improvements to dedicated land, privately owned park and recreational facilities, or Dwelling Unit Construction Tax credits (discussed further below). Recreation areas provided in a proposed residential development that are privately owned may be partially credited against the project's land dedication requirements and park fee payment if the following Department of Recreation and Parks standards are met: (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. Such facilities can include active and passive amenities, as determined by the Department of Recreation and Parks. However, credits cannot be given for yards, court areas, setbacks, and other open space areas required to be maintained by the LAMC, a specific plan, or any other planning document. Credits cannot also be provided for common open space and/or private open space required by the LAMC, a specific plan, or any other planning document, such as those included in LAMC Section 12.21 G as described above. However, a credit can be allowed whenever a Dwelling Unit Construction Tax has previously been paid for dwelling units constructed on land that requires a fee to be paid in accordance with LAMC Section 12.33.

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), the Dwelling Unit Construction Tax required is credited and reduced accordingly, if a developer has already acted upon the following, pursuant to the provisions of LAMC Sections 12.33 or 17.12: payment of park fees; installation, construction, or guarantee of improvements or recreational facilities to an existing City park or land being dedicated as a City park; dedication of land to the City; and/or a combination thereof.

Pursuant to LAMC Sections 17.12 and 17.58, a final subdivision map shall not be approved or recorded, unless a park fee has been paid or land within the subdivision has been dedicated to the City of Los Angeles for park or recreational purposes. Park fee rates for residential subdivision and non-subdivision residential projects are identified in LAMC Section 19.17 and adjusted for inflation annually.

(i) Central City North Community Plan

As previously noted, the Project Site is located within the Central City North Community Plan area. The Central City North Community Plan, adopted on August 17,

1999, includes the following objectives and policies that are relevant to parks and recreation:

- Objective 4-1: To conserve, maintain and better utilize existing recreation and park facilities which promote the recreational needs of the community.
 - Policy 4-1.1: Preserve the existing recreational facilities and park space.
- Objective 5-1: To preserve existing open space resources and where possible develop new open space.
 - Policy 5-1.1: Encourage the retention of passive and visual open space which provides a balance to the urban development of the Plan Area.
- Objective 5-2: To ensure to accessibility, security and safety of parks by their users, particularly families with children and senior citizens.
 - Policy 5-2.1: Ensure that parks are adequately illuminated for safe use at night.

In addition, the Central City North Community Plan recognizes that the provision of public services and other programs point to the complementary relationship that exists between land use and service programs. Accordingly, the Central City North Community Plan identifies the following actions, which are recommended to be promoted by the City to further the goals of the plan, that are relevant to parks and recreation:

- Encourage continuing efforts by County, State, and Federal agencies to acquire vacant land for publicly-owned open space.
- Ensure that parks are adequately illuminated and secured for safe use at night, as appropriate.
- Provide for the supervision of park activities and promote enforcement of codes restricting illegal activity.
- Coordinate with the DRP and the Police Department to ensure adequate police patrols and defensible space design.
- Improve utilization and development of recreational facilities at existing parks.
- Coordinate with City Departments, neighboring cities, and County, State, and federal agencies to utilize existing public lands such as flood control channels, utility easements, and Department of Water and Power properties to provide for such recreational needs as hiking, and biking and equestrian trails.

- Plan and design the expansion of existing facilities and the acquisition of new sites to minimize the displacement of housing and the relocation of the residents.
- Target park and recreation projects in areas with the greatest deficiencies.
- Pursue resources to clean up land that could be used for public recreation safely.

The neighborhood and community parkland to population ratio in the Central City North Community Plan area is 0.84 acre per 1,000 residents.¹² The Citywide neighborhood and community parkland-to-population ratio is 0.76 acre per 1,000 residents.¹³

b. Existing Conditions

The Project Site is currently developed and no existing parks or recreational facilities are located on-site. As shown in Figure IV.K.4-1 on page IV.K.4-12, there are a number of parks and recreational facilities located within an approximate 2-mile radius of the Project Site. Table IV.K.4-1 on page IV.K.4-13 lists the type of park, amenities, and approximate driving distance from the Project Site for these public parks and recreational facilities. In addition, there is one upcoming park construction in the vicinity of the Project Site. The City is developing a 1.96-acre park known as First and Broadway (FAB) Park at 1st Street and Broadway which would include landscaped and hardscaped space to accommodate a variety of park activities, programs, and events as well as outdoor seating areas, walking pathways, passive recreational uses, and a new two-story building for restaurant uses. The FAB Park is scheduled for completion in 2021.¹⁴

¹² Written correspondence from Darryl Ford, Senior Management Analyst II, Department of Recreation and Parks, Planning, Construction and Maintenance Branch, October 18, 2018.

¹³ Written correspondence from Darryl Ford, Senior Management Analyst II, Department of Recreation and Parks, Planning, Construction and Maintenance Branch, October 18, 2018.

¹⁴ City of Los Angeles, Initial Study/Mitigation Negative Declaration for 1st & Broadway Civic Center Park Project, January 2019.

LEGEND

- | | |
|---|---|
| 1 Everett Triangle Park
988 Everett St.
Echo Park, CA 90026 | 20 Grace E. Simons Lodge
1025 Elysian Park Dr.
Los Angeles, CA 90012 |
| 2 Alpine Recreation Center
817 Yale St.
Los Angeles, CA 90012 | 21 Downey Recreation Center
1772 N. Spring St.
Los Angeles, CA 90031 |
| 3 Lilac Terrace Park
1254 W. Lilac Terrace
Los Angeles, CA 90012 | 22 Downey Pool
1775 N. Spring St.
Los Angeles, CA 90031 |
| 4 Patton Street Park
327 Patton St.
Los Angeles, CA 90026 | 23 San Julian Park
312 E. 5th St.
Los Angeles, CA 90013 |
| 5 Vista Hermosa Park
100 N. Toluca St.
Los Angeles, CA 90026 | 24 Sunnynook River Park
Los Angeles River Bike Path,
Los Angeles, CA 90039 |
| 6 Echo Park Indoor Pool
1419 Colton St.
Los Angeles, CA 90026 | 25 Macarthur Park and Recreation Center
2230 W. 6th St.
Los Angeles, CA 90057 |
| 7 Echo Park Recreation Center
1632 Bellevue Ave.
Los Angeles, CA 90026 | 26 Macarthur Park Lake
653 S. Alvarado St.
Los Angeles, CA |
| 8 Echo Park
751 Echo Park Ave.
Los Angeles, CA 90026 | 27 Gladys Park
824 E. 6th St.
Los Angeles, CA 90021 |
| 9 Montecillo De Leo Politi Park
Scott Rd. & Academy Rd.
Los Angeles, CA 90012 | 28 Hope and Peace Park
843 S. Bonnie Brae St.
Los Angeles, CA 90057 |
| 10 Los Angeles Plaza Park
125 Paseo De La Plaza
Los Angeles, CA 90012 | 29 Occidental Parkway
Occidental Parkway
Los Angeles, CA |
| 11 Unidad Park
1644 W. Beverly Blvd.
Los Angeles, CA 90027 | 30 Arts District Park
501 S Hewitt St.
Los Angeles, CA 90013 |
| 12 City Hall Park Center
200 N. Main St.
Los Angeles, CA 90012 | 31 Prospect Park
Echandia St.
Los Angeles, CA 90033 |
| 13 Pershing Square
532 S. Olive St.
Los Angeles, CA 90013 | 32 Lafayette Park
2830 W. 6th St.
Los Angeles 90057 |
| 14 Bishop Canyon
929 Academy Rd.
Los Angeles, CA 90012 | 33 Lafayette Multipurpose Community Center and Skate Park
625 S. Lafayette Pl.
Los Angeles, CA 90057 |
| 15 Elysian Park and Therapeutic Recreation Center
929 Academy Road
Los Angeles, CA 90012 | 34 Grand Hope Park
900 S. Hope St.
Los Angeles, CA 90015 |
| 16 Lake Street Park and Community Center
227 N. Lake St.
Los Angeles, CA 90026 | 35 Lacy Street Neighborhood Park
Ave 26 & Lacy St.
Los Angeles, CA 90031 |
| 17 Buena Vista Meadow Picnic Area
Elysian Park Dr.
Los Angeles, CA 90012 | 36 Pecan Pool
120 S. Gless St.
Los Angeles, CA 90033 |
| 18 Spring Street Park
428 S. Spring St.
Los Angeles, CA 90013 | 37 Cypress Park and Recreation Center
2630 Pepper Ave.
Los Angeles, CA 90065 |
| 19 Chavez Ravine Arboretum
Chavez Ravine Rd.
Los Angeles, CA 90012 | |

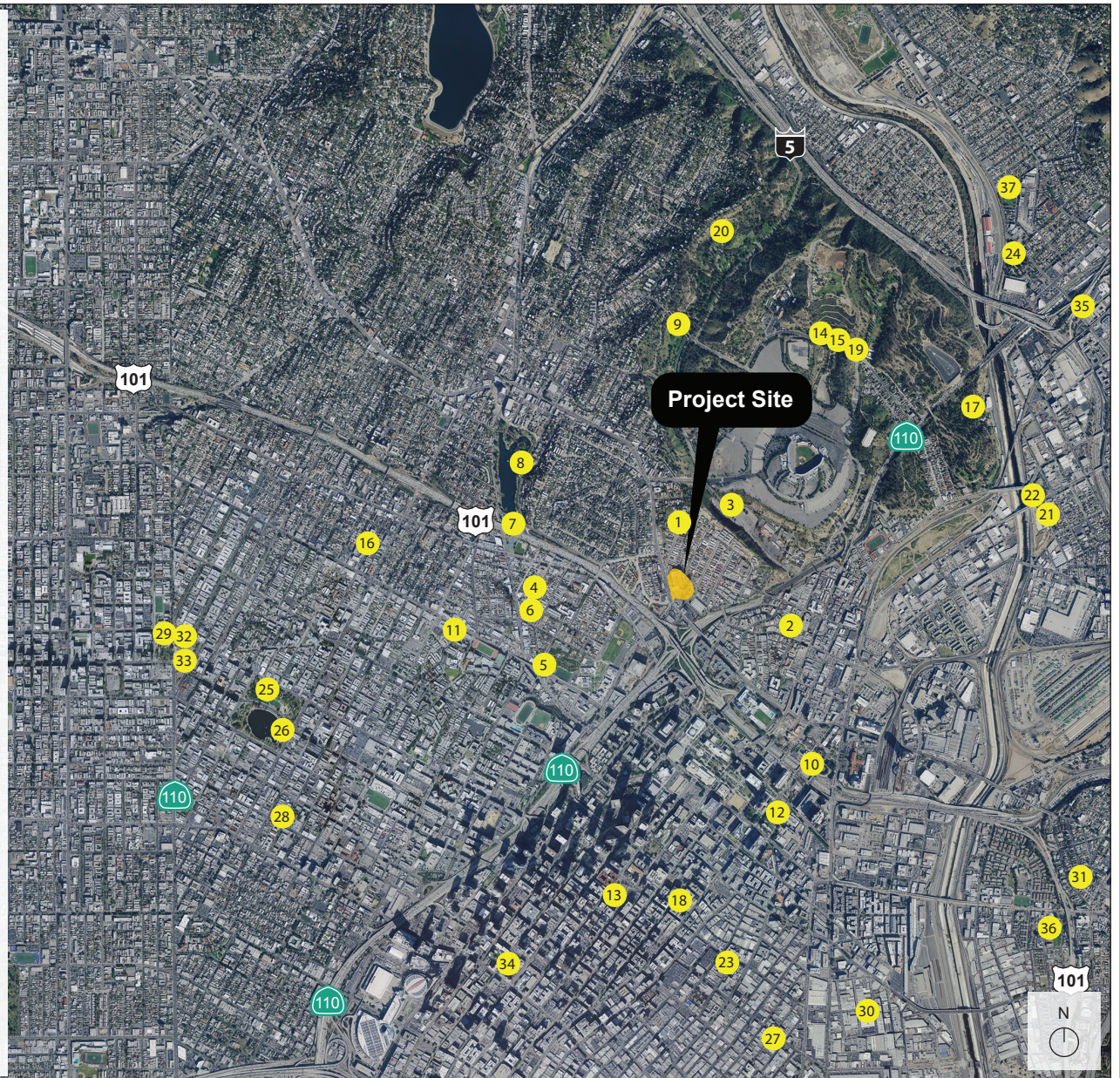


Figure IV.K.4-1
Parks and Recreational Facilities Within a 2-Mile Radius of the Project Site

**Table IV.K.4-1
Public Parks and Recreational Facilities Within a 2-Mile Radius of the Project Site**

Map No.^a	Facility and Address	Distance from Project Site^b (miles)	Type of Park/ Recreational Facilities	Amenities
1	Everett Triangle Park Everett St. Echo Park, CA 90026	0.26	Park	Grass Area
2	Alpine Recreation Center 817 Yale St. Los Angeles, CA 90012	0.48	Recreation Center	Auditorium, Basketball Courts (Lighted/Indoor), Basketball Courts (Lighted/Outdoor), Children's Play Area, Volleyball Courts (Lighted), Pergola, Small Grass Area, Table Tennis Table
3	Lilac Terrace Park 1254 W. Lilac Terrace Los Angeles, CA 90012	0.53	Park	Walking Paths, Grass Area
4	Patton Street Park 327 Patton St. Los Angeles, CA 90026	0.57	Park	Children's Play Area, Outdoor Fitness Equipment, Walking Path, Benches
5	Vista Hermosa Park 100 N. Toluca St. Los Angeles, CA 90026	0.59	Park	Walking Trails
6	Echo Park Indoor Pool 1419 Colton St. Los Angeles, CA 90026	0.61	Pool	Year-Round Pool (Indoor/Heated), Aquatic Programs
7	Echo Park Recreation Center 1632 Bellevue Ave. Los Angeles, CA 90026	0.69	Recreation Center	Barbecue Pits, Baseball Diamond (Lighted), Basketball Courts (Lighted/Indoor), Basketball Court (Lighted/Outdoor), Children's Play Area, Community Room, Soccer Field (Lighted), Tennis Courts (Lighted), Stage, Picnic Tables, Indoor Gym (without Weights), Seasonal Pool
8	Echo Park 751 Echo Park Ave. Los Angeles, CA 90026	0.81	Lake	Pedal Boats, Picnic Tables, Walking Paths
9	Montecillo De Leo Politi Park Scott Rd. & Academy Rd. Los Angeles, CA 90012	0.85	Park	Barbecue Pits, Picnic Tables, Restroom(s), Tennis Courts (Unlighted), Benches, Grass Area, Hiking Trail, Horseshoe Pits
10	Los Angeles Plaza Park 125 Paseo De La Plaza Los Angeles, CA 90012	0.88	Park	Seating Area, Walking Paths
11	Unidad Park 1644 W. Beverly Blvd. Los Angeles, CA 90027	0.92	Park	Children's Play Area, Benches

Table IV.K.4-1 (Continued)
Public Parks and Recreational Facilities Within a 2-Mile Radius of the Project Site

Map No.^a	Facility and Address	Distance from Project Site^b (miles)	Type of Park/ Recreational Facilities	Amenities
12	City Hall Park Center 200 N. Main St. Los Angeles, CA 90012	0.95	Park	Seating Area
13	Pershing Square 532 S. Olive St. Los Angeles, CA 90013	1.19	Park, Concert, Historic Banquet	Benches, Children's Play Area
14	Bishop Canyon 929 Academy Rd. Los Angeles, CA 90012	1.20	Park	Barbecue Pits, Baseball Diamond (Unlighted), Children's Play Area, Picnic Tables, Restroom(s), Walking Paths, Grass Area
15	Elysian Park and Therapeutic Recreation Center 929 Academy Road Los Angeles, CA 90012	1.20	Park, Recreation Center	Bike Path, Hiking Trail, Horseshoe Pits, Jogging Path, Restroom(s), Barbecue Pits, Basketball Courts (Unlighted/ Outdoor), Children's Play Area, Indoor Gym (with Weights), Picnic Tables, Amphitheater, Indoor Gym (without Weights), Classroom(s), Stage
16	Lake Street Park and Community Center 227 N. Lake St. Los Angeles, CA 90026	1.23	Park, Recreation Center	Basketball Courts (Lighted/Outdoor), Children's Play Area, Community Room, Indoor Gym (without Weights), Volleyball Courts (Unlighted), Small Grass Area, Skate Park
17	Buena Vista Meadow Picnic Area Meadow Rd Los Angeles, CA 90012	1.24	Park	Barbecue Pits, Children's Play Area, Picnic Tables, Benches
18	Spring Street Park 428 S. Spring St. Los Angeles, CA 90013	1.24	Park	Walking Paths, Benches
19	Chavez Ravine Arboretum Chavez Ravine Rd. Los Angeles, CA 90012	1.34	Horticulture, Park	Barbecue Pits, Children's Play Area, Picnic Tables, Restroom(s), Benches
20	Grace E. Simons Lodge 1025 Elysian Park Dr. Los Angeles, CA 90012	1.42	Reservations, Banquet	Banquet Hall, Picnic Area
21	Downey Recreation Center 1772 N. Spring St. Los Angeles, CA 90031	1.47	Recreation Center	Auditorium, Baseball Diamond (Lighted), Children's Play Area, Picnic Tables, Classroom(s), Club Room(s), Indoor Gym (without Weights), Kitchen, Multipurpose Sports Field, Stage

Table IV.K.4-1 (Continued)
Public Parks and Recreational Facilities Within a 2-Mile Radius of the Project Site

Map No.^a	Facility and Address	Distance from Project Site^b (miles)	Type of Park/ Recreational Facilities	Amenities
22	Downey Pool 1775 N. Spring St. Los Angeles, CA 90031	1.50	Pool	Seasonal Pool, Aquatic Programs
23	San Julian Park 312 E. 5th St. Los Angeles, CA 90013	1.51	Park	Benches, Picnic area
24	Sunnynook River Park Los Angeles River Bike Path Los Angeles, CA 90039	1.56	Park	Walking Path, Benches, Picnic Area
25	Macarthur Park and Recreation Center 2230 W. 6th St. Los Angeles, CA 90057	1.67	Park, Recreation Center	Baseball Diamond (Unlighted), Children's Play Area, Picnic Tables, Lake, Bandshell, Kitchen, Outdoor Fitness Equipment, Synthetic Field, Multipurpose Room
26	Macarthur Park Lake 653 S. Alvarado St. Los Angeles, CA	1.74	Lake	Barbecue Pits, Children's Play Area, Pedal Boats, Picnic Tables, Synthetic Field, Walking Paths
27	Gladys Park 824 E. 6th St. Los Angeles, CA 90021	1.82	Park	Basketball Courts (Unlighted/Outdoor), Outdoor Gym, Picnic Tables
28	Hope and Peace Park 843 S. Bonnie Brae St. Los Angeles, CA 90057	1.83	Park	Basketball Courts (Unlighted/outdoor), Benches
29	Occidental Parkway Occidental Parkway Los Angeles, CA	1.85	Park	
30	Arts District Park 501 S Hewitt St, Los Angeles, CA 90013	1.87	Park	Children's Play Area, Picnic Area
31	Prospect Park Echandia St, Los Angeles, CA 90033	1.98	Park	Picnic Area, Children's Play Area
32	Lafayette Park 2830 W. 6th St. Los Angeles 90057	1.98	Park	Basketball Courts (Unlighted/Outdoor), Soccer Field (Unlighted/Outdoor), Tennis Courts (Lighted/Outdoor), Children's Play Area, Community Room, Picnic tables, Jogging Path, Skate Park

Table IV.K.4-1 (Continued)
Public Parks and Recreational Facilities Within a 2-Mile Radius of the Project Site

Map No.^a	Facility and Address	Distance from Project Site^b (miles)	Type of Park/ Recreational Facilities	Amenities
33	Lafayette Multipurpose Community Center and Skate Park 2830 W. 6th St. Los Angeles, CA 90057	1.98	Recreation Center, Skate Park	Auditorium, Basketball Courts (Lighted/ Outdoor), Children's Play Area, Community Room, Picnic Tables, Soccer Field (Lighted), Tennis Courts (Lighted), Jogging Path, Kitchen, Synthetic Field, Skate Park
34	Grand Hope Park 900 S. Hope St. Los Angeles, CA 90015	1.9	Park	Playground, Public Art, Seating Areas
35	Lacy Street Neighborhood Park Ave 26 & Lacy St. Los Angeles, CA 90031	1.99	Park	Picnic Tables
36	Pecan Pool 120 S. Gless St. Los Angeles, CA 90033	2.0	Summer Pool	Seasonal Pool (Outdoor/Unheated), Aquatic Programs
37	Cypress Park and Recreation Center 2630 Pepper Ave. Los Angeles, CA 90065	2.11	Park, Recreation Center	Auditorium, Barbecue Pits, Children's Play Area, Indoor Gym (with Weights), Picnic Tables, Basketball Courts (Lighted / Indoor), Volleyball Courts (Lighted), Kitchen, Multipurpose Sports Field, Stage
<p>^a Map numbers correspond with Figure IV.K.4-1 on page IV.K.4-12.</p> <p>^b Distances are approximate driving distances from Project Site.</p> <p>Source: Written correspondence from Darryl Ford, Senior Management Analyst II, Department of Recreation and Parks, Planning, Construction and Maintenance Branch, October 18, 2018; City of Los Angeles, Department of Recreation and Parks Facility Locator, www.laparks.org, accessed February 2, 2021; table prepared by Eyestone Environmental, 2021.</p>				

3. Project Impacts

a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, the Project would have a significant impact related to public services (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 park services?

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?

For this analysis the Appendix G Thresholds listed above are relied upon. The analysis utilizes the following factors and considerations identified in the City's 2006 L.A. Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

The L.A. CEQA Thresholds Guide identifies the following criteria to evaluate impacts to parks:

- The net population increase resulting from the proposed project;
- The demand for recreation 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 Department of Recreation and Parks facilities, as well as the Project's recreational amenities.

c. 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 regards 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 scenarios—the Mixed Use Development Scenario and the No-Hotel Development Scenario. Under the Mixed Use Development Scenario, up to 737 residential units, up to 180 hotel rooms, up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area are proposed. Under the No-Hotel Development Scenario, a maximum of up to 827 residential units would be constructed along with up to 48,000 square feet of office space, and up to 95,000 square feet of general commercial floor area. The additional residential units (under the No-Hotel Development Scenario) would be located in the Sunset Building and would replace the 180 hotel rooms proposed by the Mixed Use Development Scenario. Regardless of the removal of the hotel, the Project design would remain as proposed. Specifically, the total floor area, building heights, massing, and footprint would be the same under both development scenarios. In addition, construction activities including depth of excavation, overall amount of grading, and the types of equipment to be used would be the same under both development scenarios. Both development scenarios are evaluated in the following analysis.

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

(1) Impact Analysis

(a) Construction

As provided above, the thresholds of significance primarily consider whether a project would increase the population in the area thereby resulting in an associated increase in 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. Given the temporary nature of construction activities, construction of a project would not introduce a permanent population to an area which could result in an increase in

the use of existing parks and recreational facilities that would result in the need for new parks and recreational facilities or the expansion of existing facilities. Additionally, 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. While there is a potential for construction workers to seek a nearby park to spend their lunch breaks, any resulting increase in the use of nearby parks and recreational facilities would be negligible. Thus, construction of the Project would not generate a demand for park facilities that cannot be adequately accommodated by existing or planned facilities and services. Therefore, the construction workers associated with the Project would not result in a notable increase in the residential population within the vicinity of the Project Site, which would result in a corresponding permanent demand for parks in the vicinity of the Project Site.

(b) Operation

The Mixed Use Development Scenario is anticipated to generate approximately 2,359 persons on-site, including 1,777 residents¹⁵ and 582 employees.¹⁶ The No-Hotel Development Scenario is anticipated to generate approximately 2,376 persons, including 2,486 residents¹⁷ and 492 employees.¹⁸ As such, the No-Hotel Development Scenario is anticipated to generate a greater number of persons onsite. It is noted, however, that the

¹⁵ Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.

¹⁶ Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the employee generation rate 0.5 employee per room for “Hotel” land use is applied to the 180 hotel rooms, the rate 0.002 employee per square foot for “General Retail” land use is applied to the 18,200 square feet of commercial uses, the rate 0.004 employee per square foot for “Supermarket” land use is applied to the 27,300-square-foot grocery store, the rate 0.001 employee per square foot for “Health Club” land use is applied to the 14,500-square-foot health club/spa, the rate 0.004 employee per square foot for “High-Turnover Sit-Down Restaurant” land use is applied to the 35,000-square-foot restaurant, and the rate 0.004 employee per square foot for “General Office” land use is applied to the 48,000 square feet of office uses.

¹⁷ Based on a household rate of 2.41 persons for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates. Source: Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.

¹⁸ Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the employee generation rate 0.002 employee per square foot for “General Retail” land use is applied to the 18,200 square feet of commercial uses, the rate 0.004 employee per square foot for “Supermarket” land use is applied to the 27,300-square-foot grocery store, the rate 0.001 employee per square foot for “Health Club” land use is applied to the 14,500-square-foot health club/spa, the rate 0.004 employee per square foot for “High-Turnover Sit-Down Restaurant” land use is applied to the 35,000-square-foot restaurant, and the rate 0.004 employee per square foot for “General Office” land use is applied to the 48,000 square feet of office uses.

Mixed Use Development Scenario would generate a greater overall visitor population associated with the proposed hotel and additional commercial uses not proposed under the No-Hotel Development Scenario.

As discussed in Section II, Project Description, of this Draft EIR, the Project would provide a variety of open space and recreational amenities to comply with the LAMC requirements. As summarized in Table IV.K.4-2 on page IV.K.4-21 the Mixed Use Development Scenario would provide a total of 82,925 square feet of common open space, including approximately 70,175 square feet of exterior common open space; 7,800 square feet of interior common open space; and 4,950 square feet of private open space and the No-Hotel Development Scenario would provide 93,050 square feet of open space, including approximately 77,075 square feet of exterior common open space; 9,075 square feet of interior common open space; and 6,900 square feet of private open space, pursuant to the requirements of the LAMC.

The primary open space amenity, under both development scenarios, would be a 20,925-square-foot courtyard (referred to as The Hill) that would be located at the center of the Project Site. The Hill would include active and passive recreation spaces such as family play features and a lawn with lounge furniture and views to the Downtown skyline. Interior common areas would include resident amenities such as fitness areas, game rooms, lounges and meeting rooms. In addition, a spa and other common areas, such as a lobby with an outdoor terrace, lounge, meeting spaces, restaurants, and a roof top pool deck would be included as part of the hotel. Additional common and private open space areas, such as gardens and terraces, would be provided throughout the Project Site. As shown in Table IV.K.4-2, the Project's proposed open space, under both development scenarios, would meet the residential open space requirement of Section 12.21 G of the LAMC.

It is anticipated that Project residents would generally utilize on-site open space, thereby offsetting projected recreational needs by the amount, variety, and availability of the proposed open space and recreational amenities provided. Although the Project's residents would be expected to utilize off-site public parks and recreational facilities such as the Alpine Recreation Center and Echo Park, 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, while the Project's commercial component could result in a demand for parks and recreational facilities, as discussed above, the Project includes an approximately 20,925-square-foot courtyard, which would be publicly accessible and available for use by other users of the Project Site.

Table IV.K.4-2
Section 12.21-G LAMC—Open Space Required and Provided by the Project
(Both Alternate Development Scenarios)

Dwelling Type	Quantity	Open Space Requirement	Total Open Space Required
Mixed Use Development Scenario			
Residential Apartments			
1BR (1BR w/2 habitable rooms)	368 du	100 sf per unit	36,800 sf
2BR (2BR w/3 habitable rooms)	369 du	125 sf per unit	46,125 sf
Total Open Space Required			82,925 sf
Open Space Proposed		Total Open Space Provided	
Exterior Common Open Space		70,175 sf	
Interior Common Open Space		7,800 sf	
Private Open Space		4,950 sf	
Total Common Open Space		82,925 sf	
Total Open Space Provided		82,925 sf	
Total Open Space Provided Above Requirement		0 sf	
No Hotel Development Scenario			
Residential Apartments			
1BR (1BR w/2 habitable rooms)	413 du	100 sf per unit	41,300 sf
2BR (2BR w/3 habitable rooms)	414 du	125 sf per unit	51,750 sf
Total Open Space Required			93,050 sf
Open Space Proposed		Total Open Space Provided	
Exterior Common Open Space		77,075 sf	
Interior Common Open Space		9,075 sf	
Private Open Space		6,900 sf	
Total Common Open Space		93,050 sf	
Total Open Space Provided		93,050 sf	
Total Open Space Provided Above Requirement		0 sf	
<hr/>			
du = dwelling units			
sf = square feet			
Source: Skidmore, Owings & Merrill LLP, 2020.			

As provided in Section II, Project Description, of this Draft EIR, the Project requires approval of a Vesting Tentative Tract Map, thus the Project would be required to either dedicate a percentage of the lot area as parkland based on the Project's proposed density and/or pay in-lieu fees in accordance with Section 17.12 of the LAMC, the City's parkland dedication ordinance enacted under the Quimby Act. As previously stated, the City's current Parks Fee Ordinance, including amendments to LAMC Sections 12.33 and 17.12,

was adopted in order to mitigate the park- and open space-related impacts of new residential development projects. Pursuant to LAMC Section 12.33, subdivision projects consisting of more than 50 residential units are subject to a Quimby in-lieu fee, while all other residential projects are subject to a park mitigation fee. LAMC Section 12.33 requires all new subdivisions containing residential dwelling units or joint living and work quarters to dedicate land, pay a fee, or provide a combination of land dedication and fee payment for the purpose of developing park and recreational facilities for new residents. Although the Project would not include dedicated parkland, as stated above, Section 17.12 provides that common open space may be credited against a project's land dedication requirement if approved by the City. However, there is the potential that some or all of the Project's recreational amenities 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, the Project would comply with Sections 12.33 and 17.12 of the LAMC.

(c) Conclusion

In determining the Project's potential impacts to parks, this analysis evaluates the potential demand of the Project for parks and recreational facilities. The Project would meet the applicable requirements set forth in Sections 12.21, 12.33, 17.12, and 21.10.3(a)(1) of the LAMC regarding the provision of useable open space and the payment of fees. **Thus, the Project would not generate a demand for park or recreational facilities that would result in the need for new or physically altered governmental facilities (i.e., parks), the construction of which could result in an impact on the environment. Therefore, impacts to parks would be less than significant.**

(2) Mitigation Measures

Project-level impacts related to parks and recreation would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to parks and recreation were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains 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

As discussed above, given the temporary nature of construction activities, construction of a project would not introduce a permanent population to an area which could result in an increase in the use of existing parks and recreational facilities that would result in the need for new parks and recreational facilities or the expansion of existing facilities. Additionally, 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. However, any resulting increase in the use of such parks and recreational facilities would be temporary and negligible. Thus, construction of the Project would not generate a demand for park facilities that cannot be adequately accommodated by existing or planned facilities and services. **Therefore, the construction workers associated with the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of park and recreational facilities would occur. Impacts would be less than significant.**

(b) Operation

As discussed above, while the Project would introduce a new residential population within the Project Site that would result in an increase in the use of existing neighborhood and regional parks and other recreation facilities, the Project would comply with the City's requirements regarding the provision of open space for the number of residential units to be provided. As previously discussed, the Mixed Use Development Scenario would provide a total of 82,925 square feet of common open space, including approximately 70,175 square feet of exterior common open space; 7,800 square feet of interior common open space; and 4,950 square feet of private open space and the No-Hotel Development Scenario would provide 93,050 square feet of open space, including approximately 77,075 square feet of exterior common open space; 9,075 square feet of interior common open space; and 6,900 square feet of private open space, pursuant to the requirements of the LAMC. The Project would provide common open space at the ground level that could be publicly accessible during daytime hours in the form of gardens, courtyards, and terraces. As discussed above, the primary open space amenity, under both development scenarios, would be a 20,925-square-foot courtyard (referred to as The Hill) that would be located at the center of the Project Site and would include active and passive recreation spaces such as family play features and a lawn with lounge furniture and views to the Downtown skyline. The Project would also provide interior common areas, including resident amenities such as fitness areas, game rooms, lounges and meeting rooms. In addition, a spa and other common areas, such as a lobby with an

outdoor terrace, lounge, meeting spaces, restaurants, and a roof top pool deck would be included as part of the hotel (under the Mixed Use Development Scenario).

Due to the amount, variety, and availability of the open space and recreational amenities proposed by the Project, it is anticipated that Project residents would generally utilize on-site open space to meet their recreational needs. While the Project's residents would be expected to utilize off-site public parks 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. If new facilities were necessary at some point in the future, State law (CEQA) would require that associated impacts be evaluated and mitigated if necessary and feasible. Similarly, while the Project's commercial component could result in a demand for parks and recreational facilities, as discussed above, the Project also includes a 20,925-square-foot courtyard, which would be publicly accessible and available for use by all users of the Project Site. **Therefore, the Project operation would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of park and recreational facilities would occur. Impacts would be less than significant.**

(2) Mitigation Measures

Project-level impacts related to parks and recreation would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to parks and recreation were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

(1) Impact Analysis

As described above, Section 12.21 G of the LAMC 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, a total of 82,925 square feet of usable open space would be required under the Mixed Used Development Scenario and 93,050 square feet of usable open space under the No-Hotel Development Scenario. As summarized in Table IV.K.4-2 on page IV.K.4-21,

the Mixed Use Development Scenario would provide a total of 82,925 square feet of common open space, and the No-Hotel Development Scenario would provide a total of 93,050 square feet of common open space. Thus, the Project would meet the LAMC's requirements for the provision of usable open space. As described in Section II, Project Description, of this Draft EIR, the Project proposes numerous open space areas and recreational amenities throughout the Project Site that could be used by Project residents and visitors. In particular, the Project would feature landscaped pedestrian walkways and a central 20,925-square-foot courtyard. Elements of the publicly accessible spaces include family play features and a lawn with lounging furniture. Additionally, the residential buildings would include resident amenities such as fitness areas, game rooms, lounges, and meeting rooms. A spa and open spaces would also be included should the Project's hotel component be built. **Therefore, as the Project would comply with the City's requirements regarding the provision of open space and due to the amount, variety, and availability of the Project's proposed open space and recreational amenities, the Project would not require the construction or expansion of existing recreational facilities, the construction of which might have an adverse physical effect on the environment. Impacts would be less than significant.**

(2) Mitigation Measures

Project-level impacts related to parks and recreation would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to parks and recreation were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e. Cumulative Impacts

(1) Impact Analysis

Cumulative growth in the vicinity of the Project Site includes specific known development projects as well as general ambient growth projected to occur. As described in Section III, Environmental Setting, of this Draft EIR, a total of 89 related projects have been identified in the vicinity of the Project Site. Much of this growth is anticipated by the City and will be incorporated into the Central City North Community Plan Update, known as the DTLA 2040 Plan, which the Department of City Planning is in the process of preparing. According to the DTLA 2040 projections, an additional approximately 125,000 people,

70,000 housing units, and 55,000 jobs will be added to the downtown area by the year 2040.¹⁹ As such, given the transformation that has and is continuing to occur in the vicinity of the Project Site, the City anticipates the proposal and development of other mixed-use developments that would increase population and the need for public services within the area, even without implementation of this Project. To this end, the City is currently developing a 2-acre park known as FAB Park at 1st Street and Broadway, which would include a restaurant building, art space, and seating areas and is scheduled for completion in 2021. In addition, there are a number of parks and recreational facilities within a 2-mile radius of the Project Site, as listed in Figure IV.K.4-1 on page IV.K.4-13, that would be available to serve new residents in the community. All 89 identified related projects fall within this 2-mile radius, which is the geographic area analyzed for purposes of assessing impacts to parks and recreational facilities. Furthermore, as with the Project, other residential or mixed-use residential projects proposed would be required to provide a certain amount of open space to comply with the requirements of the LAMC, which would help offset the demand for parks and recreational facilities generated by the related projects. Additionally, as with the Project, the related projects would undergo discretionary and CEQA review on a case-by-case basis and would be expected to coordinate with the Department of Recreation and Parks regarding the provision of open space. **Therefore, based on compliance with applicable regulatory requirements, the Project and related projects would not result in significant cumulative impacts associated with the provision of new or physically altered government facilities (i.e., parks), need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, the Project's contribution would not be, and cumulative impacts on parks and recreational facilities would be less than significant.**

(2) Mitigation Measures

Cumulative impacts related to parks and recreation would be less than significant with compliance with applicable regulatory requirements. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts related to parks and recreation were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

¹⁹ City of Los Angeles, *DTLA 2040, About This Project*, <https://planning.lacity.org/plans-policies/community-plan-update/downtown-los-angeles-community-plan-update>, accessed October 30, 2020.