

IV. Environmental Impact Analysis

H.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 vicinity and focuses on whether existing parks or facilities are sufficient to accommodate the growth that could be potentially generated by the Project or if new or physically altered government facilities would be required. 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 L of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) State Level

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

(2) Local Level

(a) City Charter

The City Charter established the 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) 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 Open Space Element

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

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

² City of Los Angeles Planning Department, *Open Space Plan*, June 1973.

The City's General Plan Open Space Element update was formally initiated pursuant to a Council motion adopted on May 24, 2001 (Council File 96-1358) and has been undergoing revisions by the Department of City Planning.^{3,4}

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.⁵ As such, the Public Recreation Plan is applicable to the Project. The guidelines of the Public Recreation Plan are described below.

(d) Public Recreation Plan

Originally adopted in 1980 by the City Council and most recently amended in September 2016, the Public Recreation Plan, a component of the City's General Plan, sets forth recreational guidelines intended to provide a basis for satisfying the needs for City recreational sites.⁶ 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

³ 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 March 13, 2020.

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

⁵ Email communication, Melinda M. Gejer, City Planning Associate, Planning, Construction and Maintenance Branch, Department of Recreation and Parks, October 24, 2017.

⁶ Office of the City Clerk, City of Los Angeles, Council File Number: 16-0529, https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=vcfi.dsp_CFMS_Report&rptid=99&cfnumber=16-0529, accessed March 13, 2020.

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 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.⁷ The Assessment provided a number of key recommendations to be implemented through a detailed master planning process. These recommendations included, but were not limited to, working with the Department of City Planning to modify the Park and Recreation Site Acquisition and Development Provisions set forth in LAMC Section 17.12 and update the Public Recreation Plan, developing an updated pricing and revenue plan to offset capital and operational costs, and implementing a land acquisition strategy involving developer impact agreements based on the standards for open space desired.^{8,9}

Based on the Assessment, the expectation of people's willingness 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.¹⁰

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.¹¹ Based on the most recent information (i.e., as of 2017), according to the Department of City Planning, 39 parks have been completed.¹²

⁷ City of Los Angeles Department of Recreation and Parks, *Final Report of the Citywide Community Needs Assessment*, 2009.

⁸ Los Angeles Department of Recreation and Parks, *Final Report of the Citywide Community Needs Assessment*, 2009.

⁹ The Assessment was prepared and released prior to the implementation of the Park Fee Ordinance. As such, this reference LAMC Section 17.12 should be considered in context of the LAMC prior to the modifications of the Park Fee Ordinance.

¹⁰ City of Los Angeles Department of Recreation and Parks, *Final Report of the Citywide Community Needs Assessment*, 2009.

¹¹ City of Los Angeles Department of Recreation and Parks, *50 Parks Initiative*, www.laparks.org/50parks, accessed March 13, 2020.

¹² City of Los Angeles Department of City Planning, *OurLA2040, Open Space Element Discussion Paper*, 2017.

(f) *City of Los Angeles Health and Wellness Element/Plan for a Healthy Los Angeles*¹³

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 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.

¹³ *City of Los Angeles Department of City Planning, Plan for a Healthy Los Angeles, March 2015.*

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, as previously described.¹⁴

(g) Los Angeles Municipal Code

In September 2016, the City adopted Ordinance 184,505, Parks Dedication and Fee Update Ordinance (Park Fee Ordinance).¹⁵ 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 in order to mitigate the park- and open space-related impacts of new residential development projects. 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 in-lieu 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 Park Fee Ordinance went into effect on January 11, 2017. The LAMC provisions, as amended by the Park Fee 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

¹⁴ Email communication, Melinda M. Gejer, City Planning Associate, Planning, Construction and Maintenance Branch, Department of Recreation and Parks, October 24, 2017.

¹⁵ Ordinance No. 184,505, approved by City Council on September 7, 2016, signed by the Mayor on September 13, 2016 and published on September 19, 2016.

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 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. 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.¹⁶ Specifically, residential subdivision projects that contain more than 50 dwelling units are required to participate in an early consultation with the DRP and 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 DRP. 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 parks 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 DRP 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 DRP. 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.

¹⁶ Exemptions (e.g., affordable housing; secondary dwelling units) are further detailed in LAMC Section 12.33-C,3.

In addition, 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 Los Angeles Department of Building and Safety. These taxes are placed into a “Park and Recreational Sites and Facilities Fund” to be used exclusively for the acquisition and development of park and recreational sites. As provided in LAMC Section 21.10.3(b), 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.

(h) Central City North Community Plan

As discussed in Section IV.F, Land Use, of this Draft EIR, the Project Site is located within the Central City North Community Plan area. The Central City North Community Plan, adopted on December 15, 2000 and amended on September 7, 2016, 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, Chapter IV of the Central City North Community Plan identifies actions which are recommended to be promoted by the City through the appropriate city departments and through other agencies, including federal, State, and private sector entities to further the goals of the plan. These are objectives or goals that the Department of City Planning does not have control over but which involve issues that should be identified in the community plan and which reinforce the intent of the objectives and policies above. The following 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 for safe use at night, where 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 the utilization of “defensible space” in the design of recreation and park facilities.
- 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 Los Angeles Department of Water and Power properties to provide for such recreational needs as hiking, biking, and horseback riding.
- 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.

The neighborhood and community parkland to population ratio in the Central City North Community Plan area is 0.84 acre per 1,000 residents.¹⁷ The Citywide neighborhood and community parkland-to-population ratio is 0.76 acre per 1,000 residents.¹⁸ As described above, the Public Recreation Plan includes a guideline of 2 acres per

¹⁷ Written correspondence from Darryl Ford, Senior Management Analyst II, Planning, Department of Recreation and Parks, Planning, Construction and Maintenance Branch, July 5, 2018.

¹⁸ Written correspondence from Darryl Ford, Senior Management Analyst II, Planning, Department of Recreation and Parks, Planning, Construction and Maintenance Branch, July 5, 2018.

1,000 persons for neighborhood sites and facilities and 2 acres per 1,000 persons for community sites and facilities. In addition, the recommended service level for regional recreational sites and facilities are 6 acres per 1,000 residents. Based on the neighborhood and community parkland to population ratio in the Central City North Community Plan area and Citywide, both the Community Plan area and the City are underserved when considering the guidelines provided in the Public Recreation Plan.

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, including 422 playgrounds, 321 tennis courts, 184 recreation centers, 72 fitness areas, 62 swimming pools and aquatic centers, 30 senior centers, 26 skate parks, 13 golf courses, 12 museums, 9 dog parks, 187 summer youth camps, 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.¹⁹

Consistent with the *L.A. CEQA Thresholds Guide*, potential impacts to parks and recreational facilities within a 2-mile radius of the Project Site area are evaluated. As shown in Figure IV.H.4-1 on page IV.H.4-12, there are a number of parks and recreational facilities located within an approximate 2-mile radius of the Project Site. Table IV.H.4-1 on page IV.H.4-13 lists the size, type of park, amenities, and approximate bird's eye view distance from the Project Site for these public parks and recreational facilities. DRP is also in the process of developing a park at the intersection of 1st Street and Broadway.²⁰

(2) Project Site

The Project Site is currently occupied by seven buildings with office, retail, and warehouse uses, as well as live-work units. The Project Site also includes two sheds and surface parking areas. Limited ornamental landscaping is provided within the Project Site. There are no parks or recreational facilities located on-site.

¹⁹ Los Angeles Department of Recreation and Parks, *Who We Are*, www.laparks.org/departments/who-we-are, accessed March 13, 2020.

²⁰ Written correspondence from Darryl Ford, Senior Management Analyst II, Planning, Department of Recreation and Parks, Planning, Construction and Maintenance Branch, July 5, 2018.

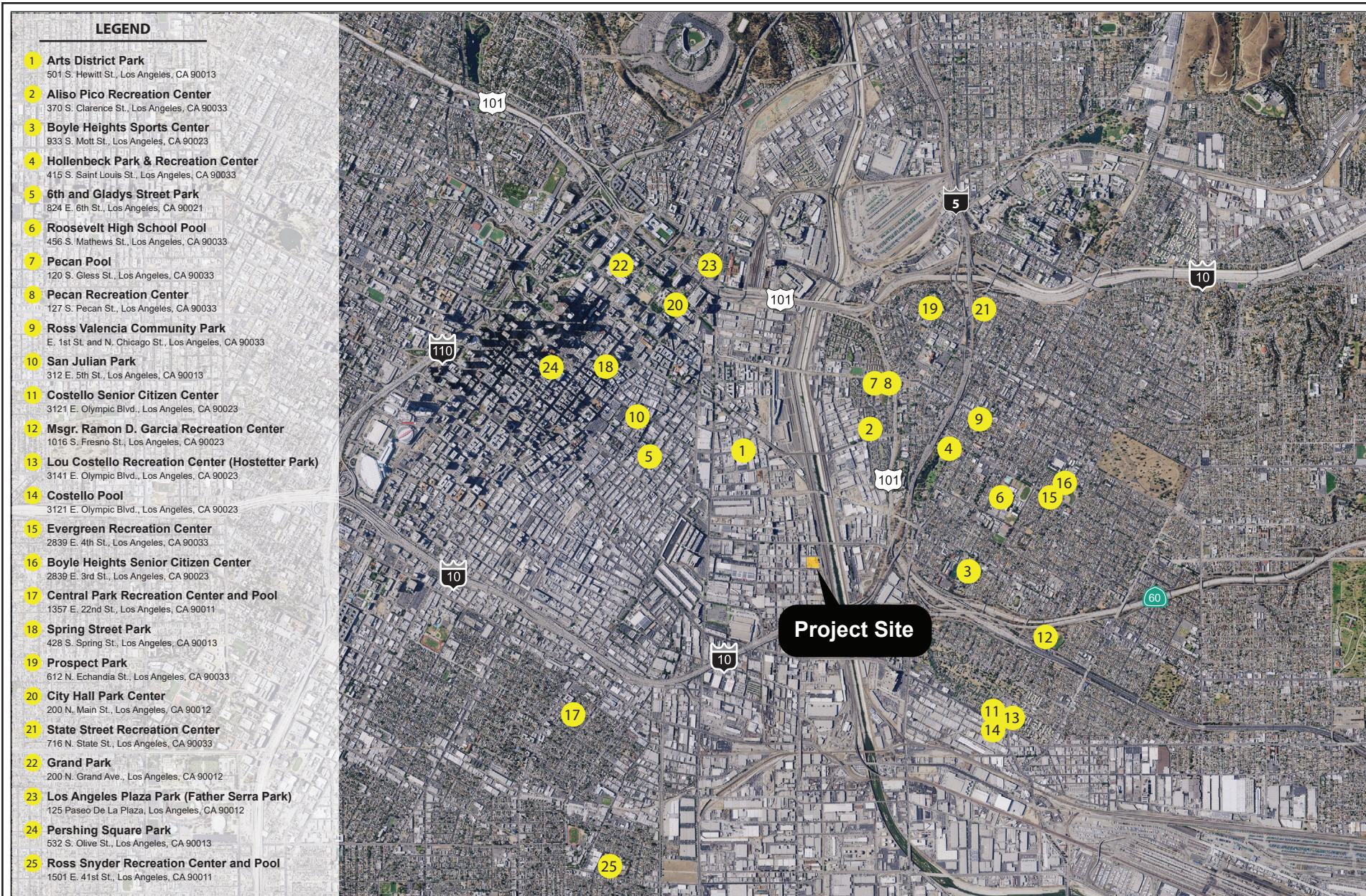


Figure IV.H.4-1
Parks and Recreational Facilities within a 2-Miles Radius of the Project Site

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

Map No.^a	Facility and Address	Distance from Project Site^b (miles)	Type of Park/ Recreational Facilities^c	Amenities
1	Arts District Park 501 S. Hewitt St. Los Angeles, CA 90013	0.71	Park	Children's Play Area, Picnic Area
2	Aliso-Pico Recreation Center 370 S. Clarence St. Los Angeles, CA 90033	0.79	Recreation Center	Playground, Auditorium, Indoor Basketball, Baseball, Volleyball, Tennis, Computer Labs, Kitchens, Music Room, Youth Programs, Arts Programs
3	Boyle Heights Sports Center 933 S. Mott St. Los Angeles, CA 90023	0.83	Recreation Center	Barbecue Pits, Baseball Diamond (Lighted/ Unlighted), Basketball Courts (Lighted/Outdoor), Children's Play Area, Community Room, Picnic Tables, Track Field, Jogging Path, Multipurpose Sports Field
4	Hollenbeck Park, Recreation Center, Safe Spot Skate Spot, and Lake 415 S. Saint Louis St. Los Angeles, CA 90033	0.93	Park, Recreation Center, Skate Park, Aquatic	Barbecue Pits, Children's Play Area, Picnic Tables, Sports and Recreation Programs, Community Room, Bandshell, Kitchen, Preschool, Outdoor Fitness Equipment, Skating Area, Lake, Bridge
5	6th and Gladys Street Park 824 E. 6th St. Los Angeles, CA 90021	0.94	Park	Basketball Courts (Unlighted/ Outdoor), Outdoor Gym, Picnic Tables
6	Roosevelt High School Pool 456 S. Mathews St. Los Angeles, CA 90033	1.01	Pool	Year Round Pool (Outdoor/ Unheated), Jacuzzi, Aquatic Programs
7	Pecan Pool 120 S. Gless St. Los Angeles, CA 90033	1.02	Pool	Seasonal Pool (Outdoor/Unheated), Aquatic Programs
8	Pecan Recreation Center 127 S. Pecan St. Los Angeles, CA 90033	1.04	Recreation Center	Basketball Courts (Lighted/Indoor and Outdoor), Children's Play Area, Community Room, Handball Courts, Picnic Tables, Seasonal Pool, Volleyball Courts (Lighted), Multipurpose Sports Field, Baseball Diamond (Lighted)
9	Ross Valencia Community Park E. 1st St. and N. Chicago St. Los Angeles, CA 90033	1.22	Park	Benches

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

Map No.^a	Facility and Address	Distance from Project Site^b (miles)	Type of Park/ Recreational Facilities^c	Amenities
10	San Julian Park 312 E. 5th St. Los Angeles, CA 90013	1.25	Park	Picnic Tables, Benches
11	Costello Senior Citizen Center 3121 E. Olympic Blvd. Los Angeles, CA 90023	1.27	Senior Citizen Center	Auditorium, Lunch Program, Recreation Activities
12	Msgr. Ramon D. Garcia Recreation Center 1016 S. Fresno St. Los Angeles, CA 90023	1.30	Recreation Center	Auditorium, Barbecue Pits, Baseball Diamond (Lighted), Basketball Courts (Lighted/Indoor and Outdoor), Children's Play Area, Community Room, Picnic Tables, Kitchen, Multipurpose Sports Field, Stage, Sports Programs
13	Lou Costello Recreation Center (Hostetter Park) 3141 E. Olympic Blvd. Los Angeles, CA 90023	1.33	Recreation Center	Auditorium, Gymnasium, Basketball Courts (Unlighted/Outdoor), Baseball Diamond (Unlighted), Children's Play Area, Picnic Tables, Fitness Equipment, After School and Child Care Programs, Sports Programs, Day Camps
14	Costello Pool 3121 E. Olympic Blvd. Los Angeles, CA 90023	1.34	Pool	Seasonal Pool (Outdoor/Unheated), Aquatic Programs
15	Evergreen Recreation Center 2839 E. 4th St. Los Angeles, CA 90033	1.36	Recreation Center	Auditorium, Basketball Courts (Lighted/Outdoor), Children's Play Area, Community Room, Indoor Gym, Picnic Tables, Dodger Dream Field, Kitchen, Multipurpose Sports Field, Sports Programs
16	Boyle Heights Senior Citizen Center 2839 E. 3rd St. Los Angeles, CA 90023	1.41	Senior Citizen Center	Auditorium, Club Rooms, Kitchen, Stage, Cooling Center, Exercise and Recreation Activities, Trips
17	Central Park Recreation Center and Pool 1357 E. 22nd St. Los Angeles, CA 90011	1.53	Recreation Center, Pool	Basketball Courts (Lighted/Indoor), Children's Play Area, Kitchen, Stage, Preschool Room, Computer Lab, Sports and Recreation Programs, Aquatic Programs
18	Spring Street Park 428 S. Spring St. Los Angeles, CA 90013	1.57	Park	Walking Paths, Benches, Grass Area

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

Map No.^a	Facility and Address	Distance from Project Site^b (miles)	Type of Park/ Recreational Facilities^c	Amenities
19	Prospect Park 612 N. Echandia St. Los Angeles, CA 90033	1.57	Park	Children's Play Area, Benches
20	City Hall Park Center 200 N. Main St. Los Angeles, CA 90012	1.64	Park	Grass Area
21	State Street Recreation Center 716 N. State St. Los Angeles, CA 90033	1.66	Recreation Center	Auditorium, Baseball Diamond (Lighted), Basketball Courts (Lighted/Outdoor), Children's Play Area, Community Room, Kitchen, Multipurpose Sports Field, Stage, Sports and Recreation Programs
22	Grand Park 200 N. Grand Ave. Los Angeles, CA 90012	1.71	Park	Grass Area, Interactive Fountain, Performance Lawn, Courtyards
23	Los Angeles Plaza Park (Father Serra Park) 125 Paseo De La Plaza Los Angeles, CA 90012	1.74	Park	Benches
24	Pershing Square Park 532 S. Olive St. Los Angeles, CA 90013	1.79	Park	Ice Skating Rink (Seasonal), Stage, Amphitheater
25	Ross Snyder Recreation Center and Pool 1501 E. 41st St. Los Angeles, CA 90011	1.94	Recreation Center, Pool	Baseball Diamond (Lighted), Basketball Courts (Lighted/Indoor and Outdoor), Children's Play Area, Picnic Tables, Seasonal Pool (Outdoor/Unheated), Soccer Field (Lighted), Tennis Courts (Lighted), Two Baseball Diamonds (Lighted), Beach Volleyball Courts (Unlighted), Seasonal Pool (Outdoor/Unheated), Sports and Recreation Programs

^a Map numbers correspond with Figure IV.H.4-1 on page IV.H.4-12.

^b Distances represent approximate bird's eye view distances.

Source: City of Los Angeles, Department of Recreation and Parks Facility Locator; Written correspondence from Darryl Ford, Senior Management Analyst II, Planning, Department of Recreation and Parks, Planning, Construction and Maintenance Branch, July 5, 2018.

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 parks and recreation if it would:

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

Threshold (b): Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

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

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

The L.A. CEQA Thresholds Guide identifies the following factors to evaluate impacts to parks and recreation:

- The net population increase resulting from the proposed project;
- The demand for recreational and park services anticipated at the time of project build-out compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand, and;
- Whether the project includes features that would reduce the demand for recreational and park services (e.g., on-site recreation facilities, land dedication or direct financial support to the Department of Recreation and Parks).

b. Methodology

The methodology used to evaluate potential park and recreation impacts included the following: (1) reviewing the existing parks and recreational facilities in the 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. Project Design Features

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

d. Analysis of Project Impacts

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

(1) Impact Analysis

(a) Public Recreation Plan

As discussed in Section II, Project Description of this Draft EIR, the Project Site is currently developed with seven buildings that comprise approximately 63,530 square feet of floor area and range in height from one to three stories and are used for 6,983 square feet of office, 25,739 square feet of retail, 2,109 square feet of warehouse use, and 10 live-work units comprised of 28,699 square feet. The Project Site also includes two sheds and surface parking areas. As the Project would remove four existing live-work units, an estimated 10 fewer people would be located on-site.²¹ However, the Project

²¹ Based on a rate of 2.42 persons per multi-family unit based on the 2017 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019.

proposes to develop 347 new live-work units within the Project Site, which would generate 840 residents. Thus, the Project would result in a net residential population of 830 residents. Therefore, the population increase associated with the Project would generate additional demand for parks and recreational facilities in the Project vicinity.

As previously stated, the Public Recreation Plan parkland guidelines are Citywide goals and do not constitute requirements for individual development projects. Based on the estimated 830 residents that would be generated by the Project, the Project would need to provide approximately 1.7 acres of neighborhood parkland to meet the Public Recreation Plan's long-range standard of 2 acres per 1,000 residents and approximately 0.8 acre to meet the Public Recreation Plan's more attainable short- and intermediate-range standard of 1 acre per 1,000 residents. Similarly, the Project would need to provide 1.7 acres of community parkland to meet the Public Recreation Plan's long-range standard for community parks of 2 acres per 1,000 residents and approximately 0.8 acre to meet the Public Recreation Plan's more attainable short- and intermediate-range standard of 1 acre per 1,000 residents.

The Project would include approximately 1.25 acres (54,369 square feet) of common open space, which would consist of a variety of open space features and recreational amenities that serve the needs of residents. The Project's 1.25 acres of common open space would fall short of the acreage required to meet the Public Recreation Plan's long-, intermediate-, and short-range standards for neighborhood and community parks. However, due to the Project's inclusion of common open space and recreational opportunities such as seating areas, outdoor kitchens, BBQs, and landscaped areas, the use of such amenities existing community parks in the area would be reduced. Notwithstanding, Project residents would still be expected to utilize neighborhood and community park amenities, including sports facilities, open space, and children's play areas.

Compliance with regulatory requirements would ensure that the intent of the Public Recreation Plan's parkland standards would be met through compliance with State law as enforced through applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces. Such requirements include the provision of on-site open space; payment of the Dwelling Unit Construction Tax; and with the Project requiring approval of a Vesting 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 previously described, LAMC Section 12.21-G requires that residential developments containing six or more dwelling units on a lot provide a minimum square footage of usable open space per dwelling unit. Based on the proposed dwelling unit types, the Project would be required to provide a total of 42,775 square feet of usable open space, as shown in Table IV.H.4-2 on page IV.H.4-20. The Project would provide a total of 71,719 square feet of usable open space consisting of 54,369 square feet of common open space (e.g., swimming pool, lounge areas, fitness centers) and 17,350 square feet of private open space (e.g., patios, balconies) for its residents. Thus, the Project would exceed the LAMC's requirement for the provision of usable open space.

According to LAMC Section 12.21-G, common open space must constitute at least 50 percent of the total required usable open space requirement. Therefore, the Project would be required to provide a minimum of 21,388 square feet of common open space. The Project would exceed the requirements of LAMC Section 12.21-G via the provision of 54,369 square feet of common open space, which would constitute approximately 76 percent of the total usable open space provided. The Project would also include a ground-level pedestrian paseo that connects the existing and proposed buildings.

Additionally, pursuant to LAMC Section 12.21-G, a minimum of 25 percent of the required common open space must be planted with ground cover, shrubs, and trees. Therefore, the Project would be required to provide a minimum of 5,347 square feet of landscaped common open space. The Project would provide approximately 8,491 square feet of landscaping within the ground level pedestrian paseo and within the outdoor amenity spaces on Levels 4 and 8 of the office building. Therefore, the Project would be consistent with this provision of the LAMC. Furthermore, Section 12.21-G requires one 24-inch box tree per four dwelling units. Based on the new 347 dwelling units proposed by the Project, 87 trees would be required. As the Project would provide a total of 129 trees on-site, the Project would be consistent with this provision of the LAMC.

In addition, LAMC Section 12.21-G generally requires that common open space be open to the sky; however, enclosed recreation rooms of at least 600 square feet or greater may count as common open space but cannot qualify for more than 25 percent of the total required usable open space. The Project would provide 2,008 square feet of indoor residential amenities on Level 9 of the residential tower, 926-square-foot community room on the ground level of the office building, and additional indoor amenities on Level 8 of the office building. These indoor amenities would meet the minimum 600-square-foot size requirement set forth in LAMC Section 12.21-G. In total, the Project would provide 10,527 square feet of indoor common areas, or approximately 24.6 percent of the total open space required. Therefore, these enclosed areas would not exceed the 25 percent maximum, and the Project would be consistent with this provision of the LAMC.

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

Open Space Requirement	Quantity	Requirement per Unit	Total Required
1-Bedroom Units (with less than 3 habitable rooms)	144 du	100 sf per du	14,400 sf
1-Bedroom Units with Den; 2-Bedroom (with 3 habitable rooms)	143 du	125 sf per du	17,875 sf
2-Bedroom Units with Den; 3-Bedroom (with more than 3 habitable rooms)	60 du	175 sf per du	10,500 sf
Total Open Space Required			42,775 sf
Minimum Common Open Space Required (50% of Total Open Space)			21,388 sf
Open Space Proposed	Total Provided		
Indoor Common			
Level 9 (Residential Tower) Indoor Amenity Rooms	2,008 sf		
Level 1 (Office Building) Community Room	926 sf		
Level 8 (Office Building) Indoor Amenity Rooms	7,593 sf		
Subtotal	10,527 sf (0.24 acre)		
Outdoor Common			
Ground Level Paseo	12,280 sf		
Level 4 (Office Building) Outdoor Residential/ Office Amenity Area	3,499 sf		
Level 8 (Office Building) Outdoor Residential/ Office Amenity Area	28,063 sf		
Subtotal	43,842 sf (1.02 acres)		
Private			
Residential Tower Private Patio/Balconies	17,350 sf		
Subtotal	17,350 sf (0.40 acre)		
Total Provided	71,719 sf (1.66 acres)		
du = dwelling units sf = square feet Source: ONNI, Enns Gauthier Landscape Architects, 2018.			

As previously stated, the City's current Park 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. Although the Project would not include dedicated parkland, as stated above, LAMC Section 12.33 provides that certain on-site recreational facilities 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 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, impacts with regard to compliance with LAMC Sections 12.33 and 17.12 would be less than significant.

(c) Central City North Community Plan

The Project would support the objectives and policies of the Central City North Community Plan through the provision of new 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 developed area, the Project would develop and provide a feasible use of recreational sites and facilities for its residents. In addition, as suggested in the Community Plan, the Project would incorporate lighting and safety features in its design. Low-level exterior lights would be installed on the building and along pathways for security and wayfinding features. During Project operation, 24-hour security would monitor entrances and exits, manage and monitor the fire/life/safety systems, patrol the perimeter of the property, and control and monitor activities in the public spaces and private outdoor areas. As such, the Project would support Community Plan objectives and policies to ensure accessibility, security, and safety to users of the recreational amenities and open space. 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 Central City North Community Plan would be less than significant.

(d) Conclusion

In determining the Project's potential impacts to parks and recreational facilities, this analysis evaluates the potential demand of Project residents for public parks and recreational facilities, as well as the Project's consistency with applicable plans, policies, and regulations related to parks and recreational facilities. As discussed above, due to the amount, variety, and availability of the Project's proposed open space and recreational amenities, it is anticipated that Project residents would generally utilize on-site open space 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) 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, the Project 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 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 mitigations measures are required.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts related to parks and recreational facilities would be less than significant without mitigation.

Threshold (b): Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

(1) Impact Analysis

(a) Construction

Construction of the Project would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on the Project is negligible.

During Project construction, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. There is a potential for construction workers to spend their lunch breaks at parks and recreational facilities that may be located in proximity to the Project Site (i.e., less than 0.5 mile). However, any resulting increase in the use of such parks and recreational facilities would be temporary and negligible. Furthermore, it is unlikely that workers would utilize parks and recreational facilities beyond a 0.5-mile radius from the Project Site, as lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes). According to Table IV.H.4-1 on page IV.H.4-13, all parks within a 2-mile radius of the Project are at least 0.5 mile from the Project Site. Therefore, it is unlikely that

construction workers would utilize any parks and recreational facilities near the Project during Project construction.

As shown in Figure IV.H.4-1 on page IV.H.4-12, there are no parks or recreational facilities adjacent to the Project Site along Violet Street or Santa Fe Avenue. Therefore, Project construction would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site or interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity. As described in Section IV.I, Transportation, of this Draft EIR, the Project's proposed haul route option from the Project Site would include use of Violet Street and Santa Fe Avenue to/from I-10 and I-605. The haul route would not travel on streets 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 or interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity.

Thus, based on the above, Project construction would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity. **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, and, as such, a substantial physical deterioration of parks and recreational facilities would not occur or be accelerated. Accordingly, impacts on parks and recreational facilities during Project construction would be less than significant.**

(b) Operation

As discussed above, the Project would introduce a net new residential population of approximately 830 persons, based on the most recent estimated household size of 2.42 persons per unit for multi-family housing units in the City of Los Angeles area.²²

The Project would include various open space and recreational amenities to serve residents and guests. Specifically, on the ground floor, the Project would feature a 12,280-square-foot pedestrian paseo system as well as 926-square-foot community room

²² Based on a rate of 2.42 persons per multi-family unit based on the 2017 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019.

within the office building. In the office building, Level 4 would include 3,499 square feet of outdoor amenities, while Level 8 would include 28,063 square feet of additional outdoor amenities. Level 8 of the office building would also provide 7,593 square feet of indoor amenities. In the residential tower, Level 9 would also include 2,008 square feet of indoor residential amenities. The Project would provide amenities such as a swimming pool, seating areas with barbeques and fire pits, a fitness center, and lounge space. In addition, the Project would provide 17,350 square feet of private residential patios/balconies. In total, the Project would provide 71,719 square feet of open space, exceeding the 42,775 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 830 net new residents would be expected to utilize off-site public parks and recreational facilities to some degree, the amenities included in the Project would reduce demand for these facilities and as a result, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities. Similarly, while the Project's non-residential components could result in indirect demand for parks and recreational facilities, such indirect demand would be partially off-set by the removal of the Project Site's existing uses and the provision of on-site open space which would be available to employees. Furthermore, as discussed below, the Project would pay in-lieu parkland fees in accordance with LAMC Sections 12.33 and 17.12. **Therefore, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. As such, impacts would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts related to parks and recreational facilities would be less than significant without mitigation.

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

(1) Impact Analysis

The Project does not include the construction or expansion of a park or recreational facility. In addition, as detailed above in the discussions under **Thresholds (a) and (b)**, the Project would comply with regulations regarding open space and recreational facilities. Furthermore, 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, thereby reducing demand for these 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. As such, impacts would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts related to parks and recreational facilities would be less than significant without mitigation.

e. Cumulative Impacts

(1) Impact Analysis

Cumulative growth in the greater Project area through 2024 includes specific known development projects, as well as general ambient growth projected to occur. As identified in Section III, Environmental Setting, of this Draft EIR, a total of 74 related projects are located in the vicinity of the Project Site. The projected growth reflected by Related Project Nos. 1 through 74 is a conservative assumption, as some of the related projects may not be built out by 2024 (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 all 74 related projects are fully built out by 2024, unless otherwise noted.

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 Central City North 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 vicinity, increased demand would lower the existing parkland to population ratio if new facilities, such as the proposed park at 1st Street and Broadway, 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 Community Plan Area's deficiency in parkland per the Public Recreation Plan's standards. 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 Central City North 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), as recently amended by the City's current Park Fee Ordinance, which was adopted in order to mitigate the park- and open space-related impacts of new residential development projects. **As such, cumulative impacts to parks and recreational facilities would be less than significant. Furthermore, based on the above, the Project's contribution to cumulative impacts to parks and recreational facilities would not be cumulatively considerable.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Cumulative impacts related to parks and recreational facilities would be less than significant without mitigation.