

## **IV. Environmental Impact Analysis**

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### **J.4 Public Services—Parks and Recreation**

#### **1. Introduction**

This section analyzes the potential impacts of the Project on parks and recreational facilities. The analysis addresses questions listed in Section XIV, Public Services—Parks; and Section XV, Recreation, in Appendix G of the State CEQA Guidelines (Appendix G). CEQA requires projects to analyze the physical impacts associated with the provision of new or altered facilities, the construction of which could cause significant environmental impacts and the physical deterioration of existing parks from new project demands. The demand for park and recreational facilities created by the Project is evaluated in light of the open space and recreational facilities to be provided as part of the Project and applicable City of Los Angeles (City) goals and regulatory requirements regarding the need for such facilities. Information and analysis in this section is based, in part, on existing service ratios, existing parks and recreational facilities, and other information provided by the Los Angeles Department of Recreation and Parks (RAP) in correspondence dated January 19, 2021. This correspondence is included in Appendix P of this Draft EIR. The information and analysis are also based on the Department of Recreation and Parks Report and Recommendations Relative to VTT-82868, dated July 2, 2020.

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

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

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

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

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

## (1) State

### *(a) Quimby Act*

California Government Code Section 66477, also known as the Quimby Act, was enacted by the California legislature in 1965. The Quimby Act authorizes cities and counties to enact ordinances requiring the dedication of land, or the payment of fees for park and/or recreational facilities in lieu thereof, or both, by developers of residential subdivisions as a condition to the approval of a tentative tract map or parcel map. As discussed below, the City implemented the Quimby Act in the City through the adoption of Los Angeles Municipal Code (LAMC) Sections 17.12, 12.33 and 19.17.

## (2) Local

### *(a) The City of Los Angeles Charter*

The City Charter established the RAP to construct, maintain, operate, and control all parks, recreational facilities, museums, observatories, municipal auditoriums, sports centers and all lands, waters, facilities or equipment set aside or dedicated for recreational purposes and public enjoyment within the City. The Board of Recreation and Parks Commissioners oversees the RAP.

With regard to control and management of recreation and park lands, Section 594(c) of the City Charter provides that all lands set apart or dedicated as a public park shall forever remain for the use of the public inviolate. However, the Board of Recreation and Parks Commissioners may authorize the use of those lands for any park purpose and for other specified purposes.

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

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

The Framework Element Chapter 9, Infrastructure and Public Services, contains policies and objectives that address the provision of parks within the City. These standards are addressed in the following policies in Table IV.J.4-1 on page IV.J.4-4:

*(ii) Open Space Element*

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

The City's General Plan Open Space Element update was formally initiated pursuant to a Council motion adopted on May 24, 2001 (Council File 96-1358) and has been undergoing revisions by the Department of City Planning. Until approval of the pending updates to the Open Space Element, the RAP is operating under the guidance of the Public Recreation Plan (PRP) discussed below.

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

As a part of the General Plan's Service Systems Element, the PRP establishes policies and standards related to parks, and recreational facilities in the City. The PRP was adopted in 1980 by the Los Angeles City Council and amended by City Council resolution in March 2016. The amendments modernize the PRP's recommendations and provide for more

**Table IV.J.4-1  
Relevant General Plan Policies—Framework Element**

No.	Policy
<b>Chapter 6: Open Space and Conservation Element</b>	
Policy 6.2.1	Establish, where feasible, the linear open space system represented in the Citywide Greenways Network map, to provide additional open space for active and passive recreational uses and to connect adjoining neighborhoods to one another and to regional open space resources.
Policy 6.2.2	Protect and expand equestrian resources, where feasible, and maintain safe links in major public open space areas such as Hansen Dam, Sepulveda Basin, Griffith Park, and the San Gabriel, Santa Monica, Santa Susanna Mountains and the Simi Hills.
Policy 6.4.1	Encourage and seek to provide for usable open space and recreational facilities that are distributed throughout the City.
Policy 6.4.2	Encourage increases in parks and other open space lands where deficiencies exist, such as South East and South Central Los Angeles and neighborhoods developed prior to the adoption of the State Quimby Act in 1965
Policy 6.4.3	Encourage appropriate connections between the City's neighborhoods and elements of the Citywide Greenways Network.
Policy 6.4.5	Provide public open space in a manner that is responsive to the needs and wishes of the residents of the City's neighborhoods through the involvement of local residents in the selection and design of local parks. In addition to publicly-owned and operated open space, management mechanisms may take the form of locally run private/non-profit management groups, and should allow for the private acquisition of land with a commitment for maintenance and public access.
Policy 6.4.6	Explore ways to connect neighborhoods through open space linkages, including the "healing" of neighborhoods divided by freeways, through the acquisition and development of air rights over freeways (such as locations along the Hollywood Freeway between Cahuenga Pass and Downtown), which could be improved as a neighborhood recreation resource.
Policy 6.4.7	Consider as part of the City's open space inventory of pedestrian streets, community gardens, shared school playfields, and privately-owned commercial open spaces that are accessible to the public, even though such elements fall outside the conventional definitions of "open space." This will help address the open space and outdoor recreation needs of communities that are currently deficient in these resources
Policy 6.4.8	Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods.
Policy 6.4.9	Encourage the incorporation of small-scaled public open spaces within transit-oriented development, both as plazas and small parks associated with transit stations, and as areas of public access in private joint development at transit station locations.
Policy 6.4.11	Seek opportunities to site open space adjacent to existing public facilities, such as schools, and encourage the establishment of mutually beneficial development agreements that make privately-owned open space accessible to the public. For example, encourage the improvement of scattered small open spaces for public access in private projects with small branch libraries, child care centers, or decentralized schools.
<b>Chapter 9: Infrastructure and Public Services</b>	
Policy 9.23.2	Prioritize the implementation of recreation and park projects in areas of the City with the greatest existing deficiencies.

**Table IV.J.4-1 (Continued)**  
**Relevant General Plan Policies—Framework Element**

No.	Policy
Policy 9.23.5	Re-evaluate the current park standards and develop modified standards which recognize urban parks, including multi-level facilities, smaller sites, more intense use of land, public/private partnerships and so on.
Policy 9.23.7	Establish guidelines for developing non-traditional public park spaces like community gardens, farmer's markets, and public plazas.
Policy 9.24.1	Phase the development of new programs and facilities to accommodate projected growth.
<p><i>Source: City of Los Angeles, The Citywide General Plan Framework, An Element of the City of Los Angeles General Plan, re-adopted 2001.</i></p>	

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

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

For a given neighborhood recreational site or facility, the amended PRP does not recommend a specific size, noting only that a school playground may partially serve this function (with up to one-half of its acreage counted toward the total acreage requirement [service level per capita]). The amended PRP does not define a specific service radius for neighborhood recreational sites and facilities, instead recommending that they should generally be within walking distance and not require users to cross a major arterial street or highway for access.

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

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

(iv) Health and Wellness Element

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

- Increase the number of neighborhood and community parks so that every Community Plan Area strives for 3 acres of neighborhood and community park space per 1000 residents (excluding regional parks and open spaces).
- Increase access to parks so that 75% of all residents are within a ¼ mile walk of a park or open space facility.
- Increase the number of schools (public, private, and charter) that have shared use agreements for community use outside of normal school hours by 25 percent.
- Increase the miles of the Los Angeles River that are revitalized for natural open space and physical activity, particularly in low-income areas.
- Increase the number of parks that feature or incorporate universally-accessible features.
- Improve the percentage of citywide population meeting physical fitness standards per week so that 50 percent of the population meets physical activity guidelines.

*(v) North Hollywood–Valley Village Community Plan*

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

As discussed in Section IV.G, Land Use, of this Draft EIR, the Project is located within the North Hollywood–Valley Village Community Plan (Community Plan) area. The Community Plan, adopted on May 14, 1996, includes the following objectives and policies that are relevant to parks and recreation:

*Objective 5.a: Providing neighborhood park and recreational facilities, including bicycle paths that utilize rights-of-way and other public lands where feasible.*

*Objective 7: To encourage open space for recreational uses for the enjoyment of both local residents and person throughout the Los Angeles region.*

*(c) Los Angeles Municipal Code*

In September 2016, the City adopted Ordinance No. 184,505, Parks Dedication and Fee Update Ordinance (Park Fee Ordinance). 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 amended LAMC Sections 12.21, 12.33, 17.03, 17.12 and 17.58, deleted LAMC Sections 17.07 and 19.01, and added LAMC Section 19.17. The Park Fee Ordinance increased Quimby in-lieu fees, provided a new impact fee for non-subdivision projects, eliminated the deferral of park fees for market rate projects that include residential units, increased the fee spending radii from the site from which the fee is collected, provided 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 updated the provisions for credits against park fees. The Park Fee Ordinance went into effect on January 11, 2017.

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

125 square feet for each unit having three habitable rooms, and 175 square feet for each unit having more than three habitable rooms. LAMC Section 12.21 G also identifies what areas of a project would qualify as usable open space for the purposes of meeting the project's open space requirements.

As stated in LAMC Section 12.21 G, usable open space is defined as areas designated for active or passive recreation and may consist of private and 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 outdoor common open space area must be planted with ground cover, shrubs, or trees. Indoor recreational amenities can account for up to 25 percent of the usable open space requirements. Private open space is defined in an area that is contiguous to and immediately accessible from an individual dwelling unit, may have a dimension no less than six feet in any direction and must contain a minimum of 50 square feet, of which no more than 50 square feet per dwelling unit can be counted towards the total required usable open space. However, Section 12.21 G's open space requirements would be superseded by the provisions in the Project's proposed Specific Plan, which would provide open space through a combination of private and common open space areas within residential buildings and shared open space areas throughout the Project Site.

LAMC Section 12.33, *Park Fees and Land Dedication*, authorized under the Quimby Act, requires developers of most residential projects to dedicate land and/or pay in-lieu fees for parks and recreational facilities. Specific requirements are determined based on the type of project and number of units. Under LAMC Section 12.33 D, the area of land within a residential subdivision that is required to be dedicated for parks and recreational uses is determined by the formulas provide therein. Land dedication and in-lieu fee payment are subject to the restrictions set forth in Section 12.33 (i.e., land must be used for park or recreational uses and fees must be used for the acquisition or development of, and not the operation or maintenance of, park land).

LAMC Section 12.33 G, *Affordable Housing Exemption*, allows new residential dwelling units that are rented or sold to persons or households of very low, low, or moderate income to receive an affordable housing exemption from the park fee and land dedication requirement. An affordable housing unit shall receive an exemption from the requirement for dedication of land for park and recreational purposes and/or payment of the park fee if the affordable housing unit is affordable to a household at or below 120 percent of the area median income. In projects with a mix of market-rate and affordable units, only the affordable housing units shall receive this exemption.



LAMC Section 12.33 H, *Credits*, allows private recreational areas developed within a project site for use by the particular project's residents to be credited as meeting up to 35 percent of the project's calculated land dedication and/or in-lieu fee requirement. Recreational areas that qualify under this provision of LAMC Section 12.33 H include, in part, indoor recreation areas, gyms, swimming pools, and spas (when the spas are an integral part of a pool complex). Furthermore, in accordance with LAMC Section 12.33 H.2, the recreational areas proposed as part of a project must meet the following standards in order to be credited against the requirement for land dedication: (1) each facility is available for use by all of the 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 recreation and park facilities.

LAMC Section 21.10.3, *Dwelling Unit Construction Tax*, establishes the payment of a dwelling unit construction tax of \$200 per new residential unit. The tax is to be paid to a "Park and Recreational Sites and Facilities Fund" for the acquisition and development of park and recreational sites and facilities. If park and recreation provisions (i.e., fees, improvements, or land dedication) have been made pursuant to LAMC Section 12.33, the fair market value of those provisions is credited against the payment of this tax.

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 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.

*(d) Los Angeles Department of Recreation and Parks 2009 Citywide Community Needs Assessment*

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

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

In response to the 2009 Citywide Community Needs Assessment, the Department of Recreation and Parks developed the *50 Parks Initiative* with the purpose of substantially increasing the number of parks and facilities available across the City, with a specific focus

on densely populated neighborhoods and communities that lack sufficient open space and recreational services.

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

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

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

## **b. Existing Conditions**

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

As previously stated, RAP is responsible for the establishment, operation, and maintenance of parks and recreational facilities within the City. Currently, RAP maintains and operates more than 444 sites for recreational use, including 422 playgrounds, 321 tennis courts, 184 recreation centers, 72 fitness areas, 62 swimming pools and aquatic centers, 30 senior centers, 26 skate parks, 13 golf courses, 12 museums, 9 dog parks, 187 summer youth camps, Venice Beach, Cabrillo Marine Aquarium, 13 lakes, and hundreds of programs for youth, adults, and seniors. RAP also administers more than 16,000 acres of parkland, which includes Griffith Park, one of the largest municipal parks within the boundaries of any American city.<sup>1</sup>

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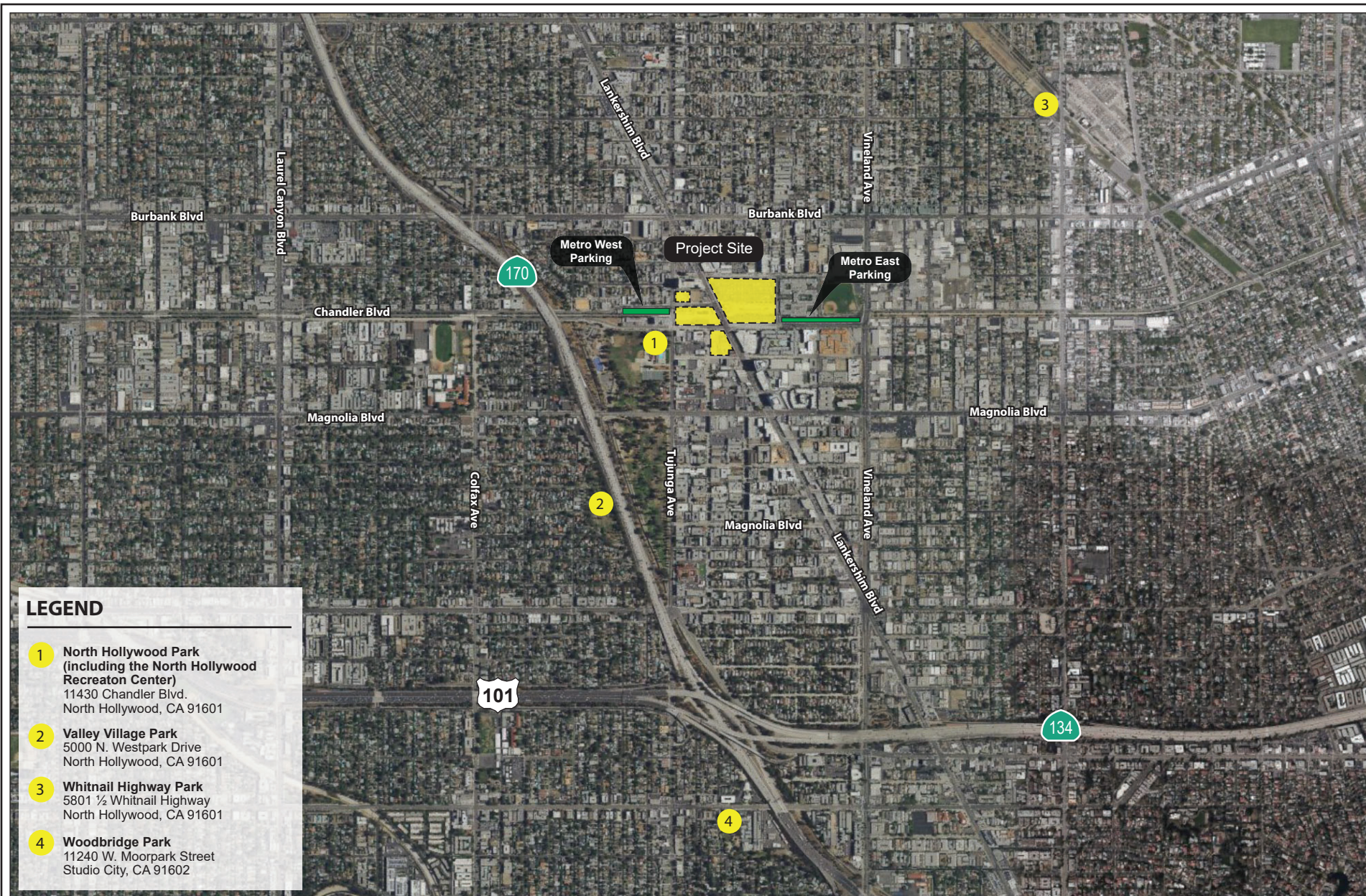
<sup>1</sup> Los Angeles Department of Recreation and Parks, *Who We Are*, [www.laparks.org/departments/who-we-are](http://www.laparks.org/departments/who-we-are), accessed February 19, 2021.

Consistent with the L.A. CEQA Thresholds Guide, potential impacts to parks and recreational facilities within a two-mile radius of the Project Site area are evaluated. As shown in Figure IV.J.4-1 on page IV.J.4-12, there are three parks located within an approximate two-mile radius of the Project Site. Table IV.J.4-2 on page IV.J.4-13 lists the size, type of park, amenities, and approximate bird's eye view distance from the Project Site for these public parks. Included among these is North Hollywood Park (including the North Hollywood Recreation Center) which is located immediately southwest of the Project Site. The North Hollywood Recreation Center portion of North Hollywood Park includes a baseball diamond, basketball courts, children's play area, handball courts, seasonal pool, tennis courts, jogging path, kitchen, outdoor fitness equipment, and a stage.

## (2) Project Site

The Project Site and Off-Site Metro Parking Areas are currently developed with industrial/warehouse buildings, the Lankershim Depot, Metro facilities including the B (Red) Line station and G (Orange) Line terminus, and surface parking. Landscaping within and surrounding the Project Site and Off-Site Metro Parking Areas is limited to trees and shrubs throughout the surface parking areas, along the adjacent roadways, and around some building perimeters. There are no parks or recreational facilities located on-site.





**Figure IV.J.J.4-1**  
Parks and Recreational Facilities within a 2-Mile Radius of the Project Site



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

<b>Map No.<sup>a</sup></b>	<b>Facility and Address</b>	<b>Distance from Project Site<sup>b</sup> (miles)</b>	<b>Type of Park/ Recreational Facilities<sup>c</sup></b>	<b>Amenities<sup>c</sup></b>
1	<b>North Hollywood Park (including North Hollywood Recreation Center)</b> 11430 Chandler Blvd. North Hollywood, CA 91601	0.02	Park and Recreation Center	Baseball Diamond, Basketball Courts, Children's Play Area, Handball Courts, Seasonal Pool, Tennis Courts, Jogging Path, Kitchen, Outdoor Fitness Equipment, Stage
2	<b>Valley Village Park</b> 5000 N. Westpark Drive, North Hollywood, CA 91601	0.71	Park	Children's Play Area, Picnic Tables, Walking Paths
3	<b>Whitnail Highway Park</b> 5801 ½ Whitnail Highway, North Hollywood, CA 91601	0.83	Dog Park	Dog Park, Picnic Tables
4	<b>Woodbridge Park</b> 11240 W. Moorpark Street, Studio City, CA 91602	1.24	Park	Children's Play Area, Picnic Tables, Outdoor Fitness Equipment, Walking Paths
<p><sup>a</sup> Map numbers correspond with Figure IV.J.4-1 on page IV.J.4-12.</p> <p><sup>b</sup> Distances represent approximate bird's eye view distances from the nearest point of the Project Site.</p> <p><sup>c</sup> City of Los Angeles, Department of Recreation and Parks Facility Locator, <a href="http://www.laparks.org">www.laparks.org</a>, accessed April 2021.</p> <p>Source: City of Los Angeles, Department of Recreation and Parks Facility Locator; Written correspondence from Darryl Ford, Superintendent, Department of Recreation and Parks, Planning, Construction and Maintenance Branch, January 19, 2021 and Eyestone Environmental, 2022.</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 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 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 RAP).

## **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 RAP facilities, as well as the Project's recreational amenities. The analysis also considers whether the Project would conflict with applicable parks and recreation standards and requirements (i.e., the Quimby Act, LAMC, and General 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 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 would remove 49,111 square feet of existing floor area, retain the 1,725-square-foot Lankershim Depot, and construct 2,207,302 square feet of floor area. There are no residential uses currently on-site, but the Project would include 1,527 new multifamily residential units, which would generate 3,717 residents.<sup>2</sup> Thus, the Project would result in a net residential population of 3,717 residents. Therefore, the population increase associated with the Project would generate additional demand for parks and recreational facilities in the Project vicinity.

As discussed above, the PRP's 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. However, as previously indicated, these guidelines are Citywide goals and are not intended to be requirements for individual development projects.

Based on the estimated 3,717 residents that would be generated by the Project, the Project would need to provide approximately 7.4 acres of neighborhood parkland to meet the

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<sup>2</sup> Based on population generation factors by use type from the Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020, Table 1. They are in residents per residential unit, and include: Multi-Family Residential = 2.25 and Affordable Housing-Family = 3.14:  $(1,216 * 2.25) + (311 * 3.14) = 3,713$ . However, because the VMT calculator itself uses 2.2533455879541 residents per multifamily unit, the resulting population is 3,717  $(1,216 * 2.2533455879541) + (311 * 3.14) = 3,717$ .

PRP's long-range standard of 2 acres per 1,000 residents and 22.3 acres of regional recreational sites and facilities to meet the PRP's standard for 6.0 acres per 1,000 residents. Similarly, the Project would need to provide 7.4 acres of community parkland to meet the PRP's long-range standard for community parks of 2 acres per 1,000 residents. However, as noted above, the PRP does not establish requirements for individual development projects.

As described in the Section II, Project Description, of this Draft EIR, the Project would provide 211,280 square feet (approximately 4.85 acres) of open space within the Project Site, 87,225 square feet (approximately 2 acres) of which would be publicly accessible but privately operated and maintained, including the ground floor open space in Blocks 0 East and 5/6, Promenade, Transit Square, and NoHo Square. The Promenade would provide approximately 27,160 square feet of open space and an urban tree canopy to provide and shade and framing along the edges of the Lankershim Boulevard and Chandler Boulevard intersection. The Transit Square would consist of approximately 39,590 square feet of open space and would feature a retail area along with a terrace and planting area that would facilitate safe and convenient access to the Metro east portal and pedestrian activity. The NoHo Square would consist of approximately 20,475 square feet of open space and would continue the Promenade open tree canopy, providing an open lawn and both fixed and movable seating areas. The Project would also include private residential balconies and rooftop amenity decks for residents.

The Project's approximately 4.85 acres of open space (including approximately 2 acres of publicly accessible open space) would fall short of the 7.4 acres required to meet the PRP's standards for neighborhood and community parks. The 4.85 acres would also fall short of the 22.3 acres required to meet PRP's standards for regional recreational sites and facilities. However, due to the Project's inclusion of common open space and recreational opportunities such as seating areas, outdoor kitchens, BBQs, Promenade, Transit Square, NoHo Square, and landscaped areas, the use of such amenities in 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 PRP's parkland standards would be met through compliance with State law as enforced through applicable LAMC requirements and Specific Plan provisions related to the provision 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. In its July 2, 2020 letter, RAP approved the payment of in-lieu fees in order to fulfill the Project's parkland requirements.



*(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 166,100 square feet of usable open space, as shown in Table IV.J.4-3 on page IV.J.4-18. The Project would provide a total of 211,280 square feet of usable open space, which includes 87,225 square feet of publicly accessible open space, portions of which may be counted towards the residential open space requirement per the Project's proposed Specific Plan. Thus, the Project would exceed the LAMC's requirement for the provision of usable open space.

Although not a requirement under the Project's proposed Specific Plan, LAMC Section 12.21 G requires that common open space must constitute at least 50 percent of the total required usable open space requirement, which would be a minimum of 83,050 square feet of common open space for the Project. The Project would exceed the requirements of LAMC Section 12.21 G on a Project-wide basis via the provision of common open space areas within the residential buildings, together with 87,225 square feet of common open space in the Promenade, Transit Square, and NoHo Square. This 87,225 square feet of ground-floor open space in Blocks 0 East and 5/6 would offer a publicly-accessible destination that is safe, comfortable, and convenient. Like traditional squares and plazas, seating would be located within the development to serve Project residents, patrons, and employees and to support public gatherings.

Additionally, although not a requirement of the Project's proposed Specific Plan, 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 20,763 square feet of landscaped common open space. The Project would provide over 50,000 square feet of landscaped common open space areas throughout a combination of the Project's residential buildings and central open space areas including the Promenade, Transit Square, and NoHo Square. 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 1,527 dwelling units proposed by the Project, 382 trees would be required. However, because of the Project's design that includes a high density of residential uses in close proximity to one another and immediate access to approximately 2 acres of open space, the Project's Specific Plan proposes a slightly reduced tree ratio of one 24-inch box tree per 4.2 dwelling units, which would supersede the provisions of the LAMC. The Project's proposed 363 trees would meet the Specific Plan's requirement.

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

**Table IV.J.4-3**  
**LAMC Section 12.21 G—Open Space Required and Provided by the Project**

Open Space Requirement	Quantity	LAMC Requirement per Unit	Total Required
Residential Apartments			
Studio (1BR w/2 habitable rooms)	441 du	100 sf/du	44,100 sf
1BR/1BA (1BR w/2 habitable rooms)	708 du	100 sf/du	70,800 sf
2BR (2BR w/3 habitable rooms)	299 du	125 sf/du	37,375 sf
3BR (3BR w/>3 habitable rooms)	79 du	175 sf/du	13,825 sf
<i>Residential Apartments Total</i>	<i>1,527 du</i>		<i>166,100 sf</i>
<b>Total Open Space Required</b>			<b>166,100 sf</b>
Open Space Location	Total Provided		
Residential Open Space			
Block 1	26,000 sf		
Block 2	24,500 sf		
Block 3	20,000 sf		
Block 4	20,575 sf		
Block 5/6	23,300 sf		
Block 7	9,680 sf		
<i>Residential Open Space Subtotal</i>	<i>124,055 sf (2.85 acres)</i>		
Publicly Accessible <sup>a</sup>			
The Promenade	27,160 sf		
Transit Square	39,590 sf		
NoHo Square	20,475 sf		
<i>Publicly Accessible Subtotal</i>	<i>87,225 sf (2.00 acres)</i>		
<b>Total Open Space Provided</b>	<b>211,280 sf (4.85 acres)</b>		
<i>du = dwelling units</i>			
<i>sf = square feet</i>			
<i><sup>a</sup> Portions of the Project's publicly accessible open space may be counted towards the residential open space requirement per the Project's proposed Specific Plan.</i>			
<i>Source: NoHo Development Associates, LLC, 2020.</i>			

space-related impacts of new residential development projects. As noted above, on July 2, 2020, RAP approved the payment of in lieu fees to meet the Project's requirements under LAMC Section 12.33.

*(c) North Hollywood–Valley Village Community Plan*

The Project would support the objectives and policies of the 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. 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.

*(d) Conclusion*

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 payment of in-lieu fees as approved by RAP on July 2, 2020. The Project would also meet the requirements of the proposed Specific Plan, which would supersede provisions of the LAMC Section 12.21. The Project would not meet the parkland provision goals set forth in the PRP. However, as previously indicated, these are Citywide goals and are not intended to be requirements for individual development projects. Furthermore, the Project would ensure that the intent of the PRP's parkland standards would be met through compliance with State law as enforced through applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces. **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. Therefore, no mitigation measures were required, 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*

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). As shown in Table IV.J.4-2 on page IV.J.4-13, only North Hollywood Park (including the North Hollywood Recreation Center) is located within 0.5 mile from the Project Site.

As shown in Figure IV.J.4-1 on page IV.J.4-12, North Hollywood Park (including the North Hollywood Recreation Center) is located immediately southwest of the Project Site. Therefore, Project construction activities (including along the proposed construction haul route, one of which would pass by North Hollywood Park along Chandler Boulevard)<sup>3</sup> would

<sup>3</sup> *Project construction haul trucks would travel on Burbank Boulevard and Lankershim Boulevard between SR-170 and the Project Site (for dump sites to the north) and on Lankershim Boulevard, Vineland Avenue, and Chandler Boulevard between the Project Site and SR-134 (for dump sites to the east). The haul route is subject to LADOT review and approval during the construction permitting process.*

have the potential to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site or interfere with existing park usage. However, as described in Section IV.K, Transportation, of this Draft EIR, a Construction Traffic Management Plan would be implemented that would identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor throughout the duration of demolition of existing Project Site improvements and construction of the Project. The Construction Traffic Management Plan would minimize the potential conflicts between construction activities, street traffic, bicyclists and pedestrians. Therefore, Project construction activities on and in the vicinity of the Project Site (including along the proposed construction haul routes which the Construction Traffic Management Plan would also apply to) would not be expected to: (1) result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site; or (2) 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 3,717 persons, based on the residents per residential unit factors in the City's VMT Calculator.<sup>4</sup>

The Project would include various open space and recreational amenities to serve residents and guests. Specifically, the Project would provide 211,280 square feet of open space within the Project, 87,225 square feet of which would be publicly accessible, privately operated and maintained. The ground-floor open space in Blocks 0 East and 5/6 (including but not limited to the Transit Square, Promenade, and NoHo Square, respectively)

<sup>4</sup> *City of Los Angeles VMT Calculator Documentation Version 1.3, May 2020, Table 1. The residents per residential unit factors applied are: Multi-Family Residential = 2.25 and Affordable Housing-Family = 3.14. Calculation:  $(1,216 * 2.25) + (311 * 3.14) = 3,713$ . However, because the VMT calculator itself uses 2.2533455879541 residents per multifamily unit, the resulting population is 3,717  $(1,216 * 2.2533455879541) + (311 * 3.14) = 3,717$ .*

would offer a publicly-accessible destination that is safe, comfortable, and convenient. Like traditional squares and plazas, seating would be located within and along the public streets bordering the proposed development to help activate dining, shopping, and gathering activities. The Promenade would provide approximately 27,160 square feet (approximately 0.62 acre) of open space, while the Transit Square would consist of approximately 39,590 square feet (approximately 0.91 acre) of open space. The Transit Square would also feature a retail area along with several planted areas and seating designed to facilitate safe and convenient access to the Metro east portal, socialization, and pedestrian activity. The NoHo Square would consist of approximately 20,475 square feet (approximately 0.47 acre) of open space that would continue the Promenade urban tree canopy, provide an open lawn, and include both fixed and movable seating areas. The Project's residential, retail, and office buildings would be located adjacent to the Promenade, Transit Square, and NoHo Square, allowing residents and pedestrians to walk outside directly into a large park-like space. Trees and landscaping are proposed at various buildings throughout the Project Site, creating a series of publicly accessible open spaces that would serve as neighborhood assets and gathering places for the residents and the North Hollywood community. Planting would be present at upper floors and along terrace edges, expanding the landscape that would be seen and experienced from the ground level. Also, as discussed above, amenities would be located throughout multiple floors within the proposed residential buildings, including pools, outdoor dining areas, landscaped park spaces, and shaded seating areas. In total, the Project would provide 211,280 square feet of open space.

Due to the amount, variety, and availability of the proposed open space and recreational amenities, it is anticipated that Project residents would generally utilize on-site open space to meet their recreational needs. Thus, while the Project's 3,717 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 above, 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. Therefore, no mitigation measures were required, and the impact level remains less than significant.

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

## (1) Impact Analysis

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. Therefore, no mitigation measures were required, and the impact level remains less than significant.

## e. Cumulative Impacts

### (1) Impact Analysis

Cumulative growth in the greater Project area through 2037 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 34 related projects are located in the vicinity of the Project Site. The projected growth reflected by Related Project Nos. 1 through 34 is a conservative assumption, as some of the related projects may not be built out by 2037 (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 34 related projects are fully built out by 2037, unless otherwise noted.

A number of the identified related projects and ambient growth projections fall within a two-mile radius of the Project Site, the geographic area analyzed for purposes of assessing impacts to parks and recreational facilities. As noted above, the Community Plan area is currently underserved when considering the desired parkland standards provided in the PRP. As the population continues to grow in the Project vicinity, increased demand would lower the existing parkland to population ratio if new facilities.

As discussed above, while it is anticipated that the Project's provision of on-site open space would serve the recreational needs of Project residents, the Project would not meet all of the parkland provision goals set forth in the PRP. Development of the related projects would exacerbate the Community Plan Area's deficiency in parkland per the PRP's standards. 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 PRP are Citywide goals and are not intended to be requirements for individual development projects. Furthermore, as with the Project, many of the related projects and other future development projects in the Community Plan area would undergo discretionary review on a case-by-case basis and would be expected to coordinate with the RAP. Future development projects would also be required to comply with the park and recreation requirements of LAMC Sections 12.21 G, 17.12, 12.33, and 21.10.3(a)(1), 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. Therefore, no mitigation measures were required, and the impact level remains less than significant.