

## **IV. Environmental Impact Analysis**

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### **H.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 February 1, 2022. This correspondence is included in Appendix H of this Draft EIR. The information and analysis are also based on the RAP Report and Recommendations Relative to VTT-82764, dated October 25, 2019.

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

## (1) State

### *(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 Framework Element**(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.H.4-1 on page IV.H.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 Public Recreation Plan (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

**Table IV.H.4-1  
Relevant General Plan Framework Element Parks and Recreation Policies**

| <b>Framework Element—Chapter 6, Open Space and Conservation</b>        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Policy 6.2.1                                                           | Establish, where feasible, the linear open space system represented in the Citywide Greenways Network map, to provide additional open space for active and passive recreational uses and to connect adjoining neighborhoods to one another and to regional open space resources.                                                                                                                                                                                                   |
| Policy 6.2.2                                                           | Protect and expand equestrian resources, where feasible, and maintain safe links in major public open space areas such as Hansen Dam, Sepulveda Basin, Griffith Park, and the San Gabriel, Santa Monica, Santa Susanna Mountains and the Simi Hills.                                                                                                                                                                                                                               |
| Policy 6.4.1                                                           | Encourage and seek to provide for usable open space and recreational facilities that are distributed throughout the City.                                                                                                                                                                                                                                                                                                                                                          |
| Policy 6.4.2                                                           | Encourage increases in parks and other open space lands where deficiencies exist, such as South East and South Central Los Angeles and neighborhoods developed prior to the adoption of the State Quimby Act in 1965                                                                                                                                                                                                                                                               |
| Policy 6.4.3                                                           | Encourage appropriate connections between the City's neighborhoods and elements of the Citywide Greenways Network.                                                                                                                                                                                                                                                                                                                                                                 |
| Policy 6.4.5                                                           | Provide public open space in a manner that is responsive to the needs and wishes of the residents of the City's neighborhoods through the involvement of local residents in the selection and design of local parks. In addition to publicly-owned and operated open space, management mechanisms may take the form of locally run private/non-profit management groups, and should allow for the private acquisition of land with a commitment for maintenance and public access. |
| Policy 6.4.6                                                           | Explore ways to connect neighborhoods through open space linkages, including the "healing" of neighborhoods divided by freeways, through the acquisition and development of air rights over freeways (such as locations along the Hollywood Freeway between Cahuenga Pass and Downtown), which could be improved as a neighborhood recreation resource.                                                                                                                            |
| Policy 6.4.7                                                           | Consider as part of the City's open space inventory of pedestrian streets, community gardens, shared school playfields, and privately-owned commercial open spaces that are accessible to the public, even though such elements fall outside the conventional definitions of "open space." This will help address the open space and outdoor recreation needs of communities that are currently deficient in these resources                                                       |
| Policy 6.4.8                                                           | Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods.                                                                                                                                                                                                                                                                                    |
| Policy 6.4.9                                                           | Encourage the incorporation of small-scaled public open spaces within transit-oriented development, both as plazas and small parks associated with transit stations, and as areas of public access in private joint development at transit station locations.                                                                                                                                                                                                                      |
| Policy 6.4.11                                                          | Seek opportunities to site open space adjacent to existing public facilities, such as schools, and encourage the establishment of mutually beneficial development agreements that make privately-owned open space accessible to the public. For example, encourage the improvement of scattered small open spaces for public access in private projects with small branch libraries, child care centers, or decentralized schools.                                                 |
| <b>Framework Element—Chapter 9, Infrastructure and Public Services</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Policy 9.23.2                                                          | Prioritize the implementation of recreation and park projects in areas of the City with the greatest existing deficiencies.                                                                                                                                                                                                                                                                                                                                                        |

**Table IV.H.4-1 (Continued)**  
**Relevant General Plan Framework Element Parks and Recreation Policies**

| <b>Framework Element—Chapter 9, Infrastructure and Public Services</b>                                                                               |                                                                                                                                                                                                                      |
|------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 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> |                                                                                                                                                                                                                      |

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

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

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

generally be within walking distance and not require users to cross a major arterial street or highway for access.

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

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

*(iv) Health and Wellness Element*

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

- Increase the number of neighborhood and community parks so that every Community Plan Area strives for 3 acres of neighborhood and community park space per 1000 residents (excluding regional parks and open spaces).
- Increase access to parks so that 75 percent of all residents are within a 0.25-mile walk of a park or open space facility.
- Increase the number of schools (public, private, and charter) that have shared use agreements for community use outside of normal school hours by 25 percent.
- Increase the miles of the Los Angeles River that are revitalized for natural open space and physical activity, particularly in low-income areas.
- Increase the number of parks that feature or incorporate universally-accessible features.

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

*(v) Hollywood Community Plan*

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

The Project Site is located within the Hollywood Community Plan area.<sup>1</sup> The Hollywood Community Plan includes an objective to encourage open space and parks in both local neighborhoods and in high density areas. In addition, the Community Plan includes the following policies that are relevant to parks and recreational facilities:

- Policy 1: That the desires of the local residents be considered in the planning of recreational facilities.
- Policy 2: That recreational facilities, programs, and procedures be tailored to the social, economic and cultural characteristics of individual neighborhoods and that these programs and procedures be continually monitored.
- Policy 3: That existing recreational sites and facilities be upgraded through site improvements, rehabilitation and reuse of sound structures, and replacement of obsolete structures, as funds become available.
- Policy 4. That, in the absence of public land, and where feasible, intensified use of existing facilities and joint use of other public facilities for recreational purposes be encouraged.

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<sup>1</sup> The Los Angeles Department of City Planning is currently preparing the Hollywood Community Plan Update. Information on the update can be accessed at <https://planning.lacity.org/plans-policies/community-plan-update/hollywood-community-plan-update>

- Policy 5: That the expansion of existing recreational sites and the acquisition of new sites be planned so as to minimize the displacement of housing and the relocation of residents.

*(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 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.

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 6 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.



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) 50 Parks Initiative*

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

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

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

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

## b. Existing Conditions

### (1) Local Area

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, nine dog parks, 187 summer youth camps, Venice Beach, Cabrillo Marine Aquarium, 13 lakes, 92 miles of hiking trails, and hundreds of programs for youth, adults, and seniors.<sup>2</sup>

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 two-mile radius of the Project Site.<sup>3</sup> Table IV.H.4-2 on page IV.H.4-13 lists the size, type of park, amenities, and approximate distance from the Project Site for these public parks and recreational facilities.

The Community Plan area has an existing neighborhood and community parks parkland acre-to-population ratio of 0.41 acre per 1,000 residents, and the City as a whole has a neighborhood and community parks parkland to population ratio of 0.84 acre per 1,000 residents.<sup>4</sup> Thus, the Community Plan area has a lower parkland-to-population ratio compared to the City, and both the Community Plan area and the City are underserved when considering the desired parkland guidelines provided in the PRP of two acres per 1,000 residents. However, the Community Plan ratio does not include regional parks, such as Runyon Canyon Park and Griffith Park, which are located within the Community Plan area. Runyon Canyon Park is a 130-acre regional park located approximately 1.23 miles northwest from the Project Site, and Griffith Park is a 4,210-acre regional park with the nearest entrance located approximately two miles northwest of the Project Site. Other than the replacement of the gymnasium at the Hollywood Recreation Center, no plans to develop new, or expand existing, parks or recreational facilities within a two-mile radius of the Project Site have been identified.<sup>5</sup>

<sup>2</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 March 23, 2021.

<sup>3</sup> 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.

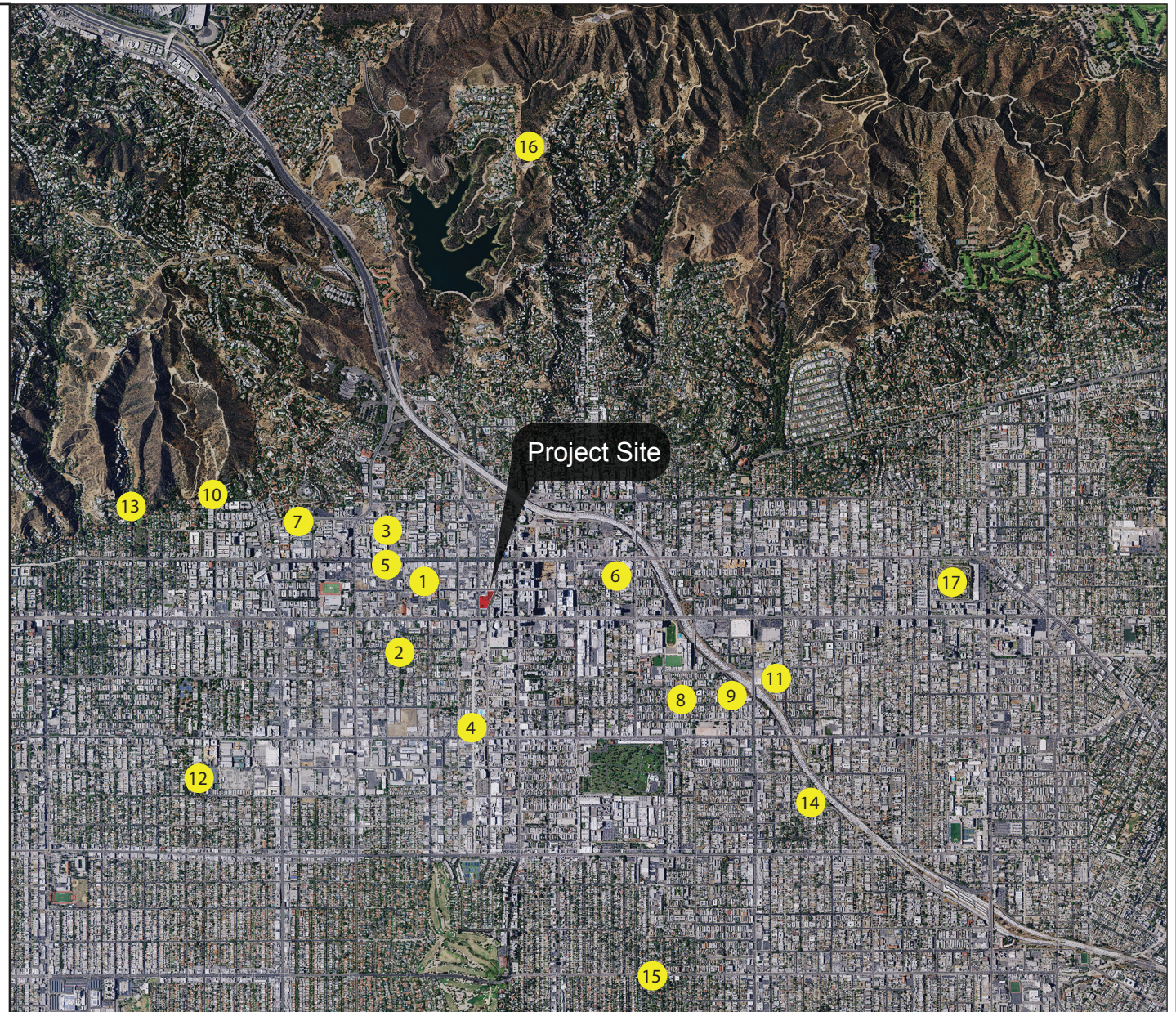
<sup>4</sup> Written correspondence from Cathie M. Santo Domingo, Assistant General Manager, and Darryl Ford, Superintendent, Department of Recreation and Parks, Planning, Maintenance, and Construction Branch, February 1, 2022.

<sup>5</sup> Written correspondence from Cathie M. Santo Domingo, Assistant General Manager, and Darryl Ford, Superintendent, Department of Recreation and Parks, Planning, Maintenance, and Construction Branch, February 1, 2022.



## LEGEND

- 1 **Selma Park**  
6567 Selma Ave., Los Angeles, CA 90028
- 2 **De Longpre Park**  
1350 N. Cherokee Ave., Los Angeles, CA 90028
- 3 **Yucca Park & Community Center**  
6671 Yucca St., Los Angeles, CA 90028
- 4 **Hollywood Recreation Center and Pool**  
1122 Cole Ave., Los Angeles, CA 90038
- 5 **Las Palmas Senior Citizen Center**  
1820 Las Palmas Ave., Los Angeles, CA 90028
- 6 **Carlton Way Park**  
5927 Carlton Way, Los Angeles, CA 90028
- 7 **Dorothy J. & Benjamin Smith Park**  
7020 Franklin Ave., Los Angeles, CA 90028
- 8 **Seily Rodriguez Park**  
5707 Lexington Ave., Los Angeles, CA 90028
- 9 **Lexington Avenue Pocket Park**  
5523 Lexington Ave., Los Angeles, CA 90038
- 10 **Runyon Canyon Park & Dog Park**  
2000 N. Fuller Ave., Los Angeles, CA 90046
- 11 **La Mirada Avenue Park**  
5401 La Mirada Ave., Los Angeles, CA 90029
- 12 **Poinsettia Recreation Center**  
7341 Willoughby Ave., Los Angeles, CA 90046
- 13 **Wattles Garden Park**  
1850 N. Curson Ave., Los Angeles, CA 90046
- 14 **Lemon Grove Recreation Center**  
4959 Lemon Grove Ave., Los Angeles, CA 90029
- 15 **Robert L. Burns Park**  
4900 Beverly Blvd., Los Angeles, CA 90004
- 16 **Lake Hollywood Park**  
3160 Canyon Lake Drive, Los Angeles, CA 90068
- 17 **Barnsdall Art Park**  
4800 Hollywood Blvd., Los Angeles, CA 90027



**Figure IV.H.4-1**

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



**Table IV.H.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</b>                                                                                                                                                      |
|----------------------------|----------------------------------------------------------------------------------------------------|-------------------------------------------------------|----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1                          | <b>Selma Park</b><br>6567 Selma Ave.<br>Los Angeles, CA 90028                                      | 0.22                                                  | Park                                                     | Children's Play Area, Benches, Outdoor Tables                                                                                                                         |
| 2                          | <b>De Longpre Park</b><br>1350 N. Cherokee Ave.<br>Los Angeles, CA 90028                           | 0.42                                                  | Park                                                     | Children's Play Area, Benches                                                                                                                                         |
| 3                          | <b>Yucca Park and Community Center</b><br>6671 Yucca St.<br>Hollywood, CA 90028                    | 0.49                                                  | Recreation Center and Park                               | Basketball Courts (Lighted/Outdoor), Children's Play Area, Picnic Tables, Soccer Field (Unlighted), Community Room, Synthetic Field                                   |
| 4                          | <b>Hollywood Recreation Center and Pool<sup>c</sup></b><br>1122 Cole Ave.<br>Los Angeles, CA 90038 | 0.49                                                  | Recreation Center and Pool                               | Auditorium/Gymnasium, Basketball Courts (Lighted/Outdoor), Children's Play Area, Community Room, Kitchen, Multipurpose Sports Field; Seasonal Pool (Outdoor/Unheated) |
| 5                          | <b>Las Palmas Senior Citizen Center</b><br>1820 Las Palmas Ave.<br>Los Angeles, CA 90028           | 0.57                                                  | Senior Citizen Center                                    | Auditorium, Community Room, Stage                                                                                                                                     |
| 6                          | <b>Carlton Way Park</b><br>5927 Carlton Way<br>Los Angeles, CA 90028                               | 0.60                                                  | Park                                                     | Children's Play Area, Outdoor Fitness Equipment                                                                                                                       |
| 7                          | <b>Dorothy J. &amp; Benjamin B. Smith Park</b><br>7020 Franklin Ave.<br>Los Angeles, CA 90028      | 0.83                                                  | Park                                                     | Benches, Sitting Area                                                                                                                                                 |
| 8                          | <b>Seily Rodriguez Park</b><br>5707 Lexington Ave.<br>Hollywood, CA 90038                          | 0.96                                                  | Park                                                     | Basketball Courts (Lighted/Outdoor), Children's Play Area, Picnic Tables, Benches                                                                                     |
| 9                          | <b>Lexington Avenue Pocket Park</b><br>5523 Lexington Ave.<br>Los Angeles, CA 90038                | 1.16                                                  | Pocket Park                                              | Soccer Field, Children's Play Area                                                                                                                                    |
| 10                         | <b>Runyon Canyon Park</b><br>2000 N. Fuller Ave.<br>Los Angeles, CA 90046                          | 1.23                                                  | Regional Park                                            | Urban Wilderness; Trails; Dog Park                                                                                                                                    |
| 11                         | <b>La Mirada Avenue Park</b><br>5401 La Mirada Ave.<br>Los Angeles, CA 90029                       | 1.31                                                  | Park                                                     | Outdoor Fitness Equipment, Picnic Tables                                                                                                                              |

**Table IV.H.4-2 (Continued)**  
**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</b>                                                                                                                                                                                                         |
|----------------------------|-------------------------------------------------------------------------------------------|-------------------------------------------------------|----------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 12                         | <b>Poinsettia Recreation Center</b><br>7341 Willoughby Ave.<br>Los Angeles, CA 90046      | 1.44                                                  | Recreation Center                                        | Baseball Diamond (Lighted), Basketball Courts (Lighted/Indoor), Basketball Courts (Lighted/Outdoor), Children's Play Area, Handball Courts (Lighted), Tennis Courts (Lighted), Kitchen, Outdoor Fitness Equipment, Stage |
| 13                         | <b>Wattles Garden Park</b><br>1850 N. Curson Ave.<br>Hollywood, CA 90046                  | 1.54                                                  | Park                                                     | Community Garden, Hiking Trail                                                                                                                                                                                           |
| 14                         | <b>Lemon Grove Recreation Center</b><br>4959 Lemon Grove Ave.<br>Los Angeles, CA 90029    | 1.68                                                  | Recreation Center                                        | Auditorium, Barbecue Pits, Baseball Diamond (Lighted), Basketball Courts (Lighted/Outdoor), Children's Play Area, Picnic Tables, Batting Cages, Jogging Path, Kitchen, Outdoor Fitness Equipment, Stage, TV Area         |
| 15                         | <b>Robert L. Burns Park</b><br>4900 Beverly Blvd.<br>Los Angeles, CA 90004                | 1.77                                                  | Park                                                     | Children's Play Area, Picnic Tables                                                                                                                                                                                      |
| 16                         | <b>Lake Hollywood Park<sup>d</sup></b><br>3160 Canyon Lake Drive<br>Los Angeles, CA 90068 | 1.95                                                  | Park                                                     | Children's Play Area, Picnic Tables                                                                                                                                                                                      |
| 17                         | <b>Barnsdall Art Park<sup>d</sup></b><br>4800 Hollywood Blvd.<br>Los Angeles, CA 90027    | 2.00                                                  | Museum, Historic, Park                                   |                                                                                                                                                                                                                          |

<sup>a</sup> Map numbers correspond with Figure IV.H.4-1 on page IV.H.4-12.

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

<sup>c</sup> According to RAP, the City plans to demolish the existing gymnasium building at the Hollywood Recreation Center and construct a new gymnasium building. The project is currently in the design phase.

<sup>d</sup> Facility was not included on the list of facilities provided by RAP but was identified in the RAP Parks Facility Locator.

Source: Written correspondence from Cathie M. Santo Domingo, Assistant General Manager, and Darryl Ford, Superintendent, Department of Recreation and Parks, Planning, Maintenance, and Construction Branch, February 1, 2022, and City of Los Angeles, Department of Recreation and Parks Facility Locator, [www.laparks.org/maplocator](http://www.laparks.org/maplocator), accessed March 23, 2021.

## (2) Project Site

The 1.55 acre Project Site is currently occupied by a surface parking area (Development Area) and six one- and two-story commercial structures, which will remain. The commercial uses contain approximately 33,828 square feet of floor area and include a variety of retail, restaurant, and service uses. There is limited ornamental landscaping on the Project Site. There are no parks or recreational facilities located on-site.

## 3. Project Impacts

### a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G (Section XIV, Public Services—Parks), the Project would have a significant impact related to parks 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.***

In accordance with the State CEQA Guidelines Appendix G (Section XV, Recreation), the Project would have a significant impact related to recreation if it would:

***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 RAP facilities, as well as the Project's recreational amenities. The analysis also considers whether the Project would conflict with the parks and recreation standards set forth in regulatory documents (i.e., the Quimby Act, the LAMC, the General Plan, and the PRP).

## c. Project Design Features

No specific project design features beyond the provided open space described in Section II, Project Description, of this Draft EIR, are 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) Construction*

As provided above, the thresholds of significance primarily consider whether a project would increase the population in the area, thereby resulting in an associated increase in the use of existing neighborhood and regional parks or other recreational



facilities such that substantial physical deterioration of the facility would occur or be accelerated. Given the temporary nature of construction activities, construction of a project would not introduce a permanent population to an area that could result in an increase in the use of existing parks and recreational facilities that would result in the need for new parks and recreational facilities or the expansion of existing facilities. Additionally, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. While there is a potential for construction workers to seek a nearby park to spend their lunch breaks, any resulting increase in the use of nearby parks and recreational facilities would be negligible, particularly because there are no park facilities directly adjacent to the Project Site. Thus, construction of the Project would not generate a demand for park facilities that cannot be adequately accommodated by existing or planned facilities and services. **Therefore, the construction workers associated with the Project would not result in an increase in the residential population within the vicinity of the Project Site, which would result in a corresponding permanent demand for parks in the vicinity of the Project Site.**

*(b) Operation*

As discussed in Section II, Project Description of this Draft EIR, the Project Site is currently developed with a surface parking area (Development Area) and six one- and two-story structures that contain approximately 33,828 square feet of floor area and provide a variety of retail, restaurant, and service uses (4,000 square feet of this floor area has been vacant since prior to 2018). The Project would replace the surface parking within the Project Site and retain the six existing buildings. The Project proposes to develop 270 new residential dwelling units within the Project Site, including 27 units restricted for Extremely Low Income households, which would generate approximately 632 residents.<sup>6</sup> Thus, the Project would result in a net residential population of 632 residents. Therefore, the population increase associated with the Project would generate additional demand for parks and recreational facilities in the Project vicinity.

*(i) Public Recreation Plan*

As discussed above, the PRP guidelines for both neighborhood sites and facilities and community sites and facilities are two acres per 1,000 residents. In addition, the recommended service levels for regional recreational sites and facilities are six acres per 1,000 residents. However, as previously indicated, these guidelines are Citywide goals

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<sup>6</sup> Based on a 2.25 persons per household rate for the 243 multi-family units and a 3.14 person per household rate for the 27 affordable housing – family units based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020.

and are not intended to serve as requirements for individual development projects. Nonetheless, when applying the Citywide goals to the Project, based on the Project's estimated 632 residents, the Project would need to provide approximately 1.3 acres of neighborhood parkland and community parkland to meet the PRP's goal of two acres per 1,000 residents.

The Project would include approximately 0.56 acre (24,218 square feet) of usable, common open space, which would consist of a variety of open space features and recreational amenities to serve residents' recreational needs. The Project's 0.56 acre of common open space would fall short of the PRP's guidelines for neighborhood and community sites and facilities. However, as previously stated, the PRP's parkland guidelines are Citywide goals and do not constitute requirements for individual development projects. Furthermore, compliance with regulatory requirements, including applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces (discussed below), would ensure that the intent of the PRP's parkland guidelines would be met. Such requirements include the provision of on-site recreational amenities and open space; payment of park fees pursuant to LAMC Section 12.33, as authorized under the Quimby Act; and payment of the Dwelling Unit Construction Tax pursuant to LAMC Section 21.10.3; or through a combination of these methods.

*(ii) LAMC*

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 29,625 square feet of usable open space, as outlined in Table IV.H.4-3 on page IV.H.4-19. The Project would provide a total of 30,918 square feet of usable open space consisting of 24,218 square feet of common open space (e.g., swimming pools, lounge areas, and fitness center on Level 4 and Level 25) and 6,700 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 14,813 square feet of common open space. The Project would exceed the requirements of LAMC Section 12.21-G via the provision of 24,218 square feet of common open space, which would constitute approximately 82 percent of the total usable open space provided.

Additionally, pursuant to LAMC Section 12.21-G, a minimum of 25 percent of the outdoor common open space must be planted with ground cover, shrubs, and trees. Thus,

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

| Open Space Requirement                                                 | Quantity              | Requirement per Unit | Total Required |
|------------------------------------------------------------------------|-----------------------|----------------------|----------------|
| Studios; 1-Bedroom Units (with less than 3 habitable rooms)            | 185 du                | 100 sf per du        | 18,500 sf      |
| 1-Bedroom Units with Den; 2-Bedroom (with 3 habitable rooms)           | 75 du                 | 125 sf per du        | 9,375 sf       |
| 2-Bedroom Units with Den; 3-Bedroom (with more than 3 habitable rooms) | 10 du                 | 175 sf per du        | 1,750 sf       |
| Total Open Space Required                                              |                       |                      | 29,625 sf      |
| Minimum Common Open Space Required (50 Percent of Total Open Space)    |                       |                      | 14,813 sf      |
| Open Space Proposed                                                    | Total Provided        |                      |                |
| Indoor Common                                                          |                       |                      |                |
| Level 4 Indoor Amenity Area                                            | 3,858 sf              |                      |                |
| Level 25 Roof Deck                                                     | 1,801 sf              |                      |                |
| Subtotal                                                               | 5,659 sf (0.13 acre)  |                      |                |
| Outdoor Common                                                         |                       |                      |                |
| Level 4 Outdoor Amenity Area                                           | 14,590 sf             |                      |                |
| Level 25 Roof Deck                                                     | 3,969 sf              |                      |                |
| Subtotal                                                               | 18,559 sf (0.43 acre) |                      |                |
| Private                                                                |                       |                      |                |
| Private Balconies                                                      | 6,700 sf              |                      |                |
| Subtotal                                                               | 6,700 sf (0.15 acre)  |                      |                |
| Total Provided                                                         | 30,918 sf (0.71 acre) |                      |                |
| <hr/>                                                                  |                       |                      |                |
| du = dwelling units                                                    |                       |                      |                |
| sf = square feet                                                       |                       |                      |                |
| Source: Gensler, 2020.                                                 |                       |                      |                |

the Project would be required to provide a minimum of 4,640 square feet of landscaped common open space. The Project would provide approximately 5,300 square feet of landscaping at the ground level surrounding the Project and on the Level 4 and Level 25 outdoor amenity areas. 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 270 dwelling units proposed by the Project, 68 trees would be required. As the Project would provide a total of 68 trees on-site, the Project would be consistent with this provision of the LAMC.

In addition, LAMC Section 12.21-G typically 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 5,659 square feet of indoor residential amenities on Level 4 and Level 25. 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 5,659 square feet of indoor common areas, or approximately 19 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.

As previously discussed, the City's Park Fee Ordinance was adopted in order to mitigate the park- and open space-related impacts of new residential development projects. In addition, LAMC Section 21.10.3 establishes a Dwelling Unit Construction Tax to be used for the acquisition and development of park and recreational sites and facilities.<sup>7</sup> Pursuant to LAMC Section 17.04, RAP is to submit a report to the Department of City Planning's Advisory Agency for each application for subdivision map approval, and that report "shall contain recommendations, approved by the Board of Recreation and Parks Commissioners (Board), specifying the land to be dedicated, the payment of fees in lieu thereof, or a combination of both...." As the Project is seeking approval of a subdivision map, consistent with the requirements of LAMC Section 17.04, on October 23, 2019, the RAP Board approved Board Report 19-220 which recommends that the Advisory Agency require the Applicant to pay in-lieu park fees in order to fulfill the Project's requirements under provisions of LAMC 12.33. Therefore, consistent with this recommendation, the Project will comply with the requirements of the Park Fee Ordinance as well as other LAMC provisions, and impacts with regard to compliance with LAMC Sections 12.21, 12.33, 17.12, 17.58, 19.17, and 21.10.3, would be less than significant.

*(iii) City of Los Angeles General Plan*

The City's General Plan includes several elements that outline goals, objectives, and policies addressing parks and recreation, including, as outlined above, the Framework Element (Open Space and Conservation Chapter and Infrastructure and Public Services Chapter), the Open Space Element, the Public Facilities and Services Element (PRP), and the Health and Wellness Element. The Hollywood Community Plan also includes policies related to parks and recreation.

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<sup>7</sup> *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 the dwelling unit construction tax.*

As discussed in Section IV.F, Land Use and Planning, of this Draft EIR, the Project would support the open space- and recreation-related policies of the various General Plan elements and the Community Plan by the provision of new on-site open space and recreational amenities for Project residents and guests that exceed the requirements of the LAMC. These amenities would offset the demand that would be generated by Project residents for public parks and recreational facilities in the Community Plan area, and, 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. Furthermore, the Project would provide a mix of uses that would incorporate open space areas and promote walkability and biking and contribute to the creation of a healthy community. In addition, the Project would incorporate elements that promote individual and community safety throughout the Project Site, including open space areas that are well-lit and equipped with a closed-circuit camera system to allow for monitoring of such areas to ensure public safety and security at all times. Thus, 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. Impacts with respect to consistency with the relevant General Plan and Community Plan policies would be less than significant.

*(c) Conclusion*

In determining the Project's potential impacts to parks and recreational facilities, this analysis evaluates the potential demand of Project residents for public parks and recreational facilities, as well as the Project's consistency with applicable plans, policies, and regulations related to parks and recreational facilities. As discussed above, due to the amount, variety, and availability of the Project's proposed open space and recreational amenities, it is anticipated that Project residents would generally utilize on-site open space and recreational amenities to meet many of their recreational needs. Furthermore, the Project would meet the applicable requirements set forth in LAMC Sections 12.21, 12.33, 17.12, 17.58, 19.17, and 21.10.3 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 PRP. However, as previously indicated, these are Citywide goals and are not intended to be requirements for individual development projects. 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.**

## (2) Mitigation Measures

Project-level impacts with regard to parks and recreational facilities would be less than significant. 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.

As previously discussed, 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. However, as outlined in Table IV.H.4-1 on page IV.H.4-4 and as illustrated in Figure IV.H.4-1 on page IV.H.4-12, there are no parks that are adjacent to the Project, and the closest park (Selma Park) is located more than two blocks from the Project Site. While it is possible for construction workers to utilize recreation facilities that are within a short walking distance of the Project site, 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). Therefore, any use of parks and recreational facilities near the Project Site by construction workers would be negligible.

In addition, as shown in Figure IV.H.4-1, there are no parks or recreational facilities adjacent to the Project Site along Ivar Avenue or Selma (the nearest park is Selma Park, located more than two blocks from the Project Site). Therefore, Project construction would not be expected to result in access restrictions to City parks or 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. Furthermore, construction delivery/haul trucks would travel on approved truck routes between the Project Site and the Hollywood Freeway (US-101). Incoming trucks would exit the US-101 onto Gower Street, travel south on Gower Street, west on Yucca Street, south on Cahuenga Boulevard, and east on Selma Avenue to the Project Site. Outgoing trucks would exit the Project Site onto Selma Avenue, head east on Selma Avenue, north on Argyle Avenue, and onto the US-101 south bound on-ramp. These haul routes would not travel on streets adjacent to any public park or recreational facility. Therefore, use of these haul routes 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. In addition, as described in Section IV.I, Transportation, of this Draft EIR, the Project would adhere to a Construction Traffic Management Plan, pursuant to Project Design Feature TR-PDF-2, which would ensure that access would remain unobstructed for land uses in proximity to the Project Site during construction, including park and recreational facilities.

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 632 persons. The Project would include various open space and recreational amenities to serve residents and guests. Specifically, Level 4 of the building would include 14,590 square feet of outdoor amenity space, including a pool and spa, lounge areas, and an outdoor kitchen, as well as 3,858 square feet of indoor amenity space, including a fitness center. Level 25 would include 3,969 square feet of additional outdoor amenity space, including lounge areas and a pool, and 1,801 square feet of indoor amenity space, including a spa area. In addition, the Project would provide 6,700 square feet of private residential patios/balconies. In total, the Project would provide

30,918 square feet of open space, exceeding the 29,625 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 632 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, the Project's commercial components, which are estimated to generate approximately 43 employees, could result in additional demand for parks and recreational facilities. However, as there are no parks directly adjacent to the Project Site, and the employees working on the Project Site would have varying shift and break times during which they may use nearby parks, the use of parks and recreational facilities near the Project Site by Project employees would be negligible. Furthermore, as described above, the Project would meet the applicable requirements set forth in LAMC Sections 12.21, 12.33, 17.12, 17.58, 19.17, and 21.10.3 regarding the provision of useable open space and the dedication of parkland or the payment of in-lieu fees. **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. Impacts would be less than significant.**

## (2) Mitigation Measures

Project-level impacts with regard to parks and recreational facilities would be less than significant. 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 Threshold (a) and



Threshold (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 offsetting demand for these off-site facilities. **Therefore, the Project would not include or require the construction or expansion of recreational facilities, the construction of which 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. 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 2025 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 46 related projects are located in the vicinity of the Project Site. The projected growth reflected by Related Project Nos. 1 through 46 is a conservative assumption, as some of the related projects may not be built out by 2025 (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 46 related projects are fully built out by 2025, unless otherwise noted. All 46 of the related projects 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 discussed above and listed in Table IV.H.4-1 on page IV.H.4-4, several parks and recreational facilities are located within a 2-mile radius of the Project Site and are available to serve new residents in the community. As the population continues to grow in the Project vicinity, increased demand would lower the existing parkland to population ratio if new facilities are not constructed. As indicated in written correspondence from RAP,

although data regarding the level of use for individual recreational facilities that serve the Project area is not available, parks within the surrounding community are heavily utilized and often overburdened.<sup>8</sup> Development of the related project would likely exacerbate the parkland deficiency in the Community Plan area 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, other residential and mixed-use residential project would be required to provide a certain amount of open space to comply with the LAMC requirements, which would help to offset the demand for parks and recreational facilities generated by the related projects. Additionally, as with the Project, the related projects would undergo discretionary review on a case-by-case basis and would be expected to coordinate with RAP regarding the provision of open space. Future development projects would also be required to comply with the park and recreation requirements of LAMC Sections 12.21, 12.33, 17.12, 17.58, 19.17, 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. **Therefore, based on compliance with applicable regulatory requirements, the Project and related projects would not result in significant cumulative impacts associated with the provision of new or physically altered government facilities (i.e., parks), need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts on parks and recreational facilities would be less than significant.**

## (2) Mitigation Measures

Cumulative impacts with regard to parks and recreational facilities would be less than significant. 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 or included, and the impact level remains less than significant.

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<sup>8</sup> *Written correspondence from Cathie M. Santo Domingo, Assistant General Manager, and Darryl Ford, Superintendent, Department of Recreation and Parks, Planning, Maintenance, and Construction Branch, February 1, 2022.*