

# IV. Environmental Impact Analysis

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## J. Public Services

### 4. 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 August 14, 2017. This correspondence is included in **Appendix K** of this Draft EIR.

#### 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
  - Central City North Community Plan
- Los Angeles Municipal Code (LAMC)
- 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.<sup>1</sup>

## (2) Local

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

The City Charter established 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 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.<sup>2</sup>

### (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 Chapter 6, Open Space and Conservation and Chapter 9, Infrastructure and Public Services, contains policies and objectives that address the provision of parks within the

<sup>1</sup> Los Angeles Department of Recreation and Parks website, Quimby, <https://www.laparks.org/planning/park-fees>. Accessed August 22, 2022.

<sup>2</sup> See also, Los Angeles Administrative Code Sections 23.104 et seq, [https://codelibrary.amlegal.com/codes/los\\_angeles/latest/laac/0-0-0-55687](https://codelibrary.amlegal.com/codes/los_angeles/latest/laac/0-0-0-55687). Accessed August 22, 2022.

City. These standards are addressed in the following policies in **Table IV.J.4-1, Relevant General Plan Policies.**

**Table IV.J.4-1  
Relevant General Plan 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.

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

<b>Framework Element - Chapter 6, Open Space and Conservation</b>	
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.
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.
<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>	

*(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, 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 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, 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%.
- 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) *Central City North 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.D, Land Use and Planning**, of this Draft EIR, the Project Site is located within the planning boundary of the Central City North Community Plan, which guides land uses on the Project Site and in the surrounding areas. The current plan (adopted December 15, 2000) sets forth planning goals and objectives to maintain the community's distinctive character. Chapter III of the Central City North Community Plan, Land Use Policies and

Programs, includes the following applicable goals, objectives and policies addressing open space, recreation and park facilities:

- Goal 4:** Adequate recreation and park facilities which meet the needs of the residents in the Plan Area.
- Objective 4-1:** Conserve, maintain and better utilize existing recreation and park facilities which promote the recreational needs of the community.
- Policy 4-1.1:** Preserve the existing recreational facilities and parks.
- Goal 5:** A community with sufficient open space in balance with development to serve the recreational, environmental and health needs of the community and to protect environmental and aesthetic resources.
- Objective 5-1:** Preserve existing open space resources and where possible develop new open space.
- Policy 5-1.1:** Encourage the retention of passive and visual open space which provides a balance to the urban development of the Plan Area.

(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 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.

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, the Department of Recreation and Parks (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.<sup>3</sup>

(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 (Strategic Plan) is the most recent strategic plan for \ RAP, effective from 2018 until 2022. The 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 Strategic Plan reflects chief priorities of RAP, confronts new and existing challenges, and lays the framework to pursue new opportunities. Within the 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.

<sup>3</sup> City of Los Angeles Department of Recreation and Parks, Final Report of the Citywide Community Needs Assessment, 2009, <https://www.laparks.org/sites/default/files/projects/2009%20Community%20Needs%20Assessment%20-%20Final.pdf>. Accessed August 22, 2022.

## b) Existing Conditions

RAP is responsible for the establishment, operation, management and maintenance of all municipally owned and operated recreation and park facilities within the City. These facilities include parks, swimming pools, public golf courses, recreation centers, museums, youth camps, tennis courts, sports programs and programs for senior citizens. RAP also supervises construction of new facilities and improvements to existing ones. Currently RAP maintains over 16,000 acres of parkland between within approximately 444 regional, community, and neighborhood 422 playgrounds, 321 tennis courts, 187 summer youth camps, 184 recreational centers, 72 fitness areas, 62 swimming pools and aquatic centers, 30 senior centers, 26 skate parks, 13 municipal golf courses, 12 museums, nine dog parks and help support the Summer Night Lights gang reduction and community intervention program. RAP oversees Griffith Park (including the Greek Theater and Griffith Observatory) as well as supports the City's urban wilderness and open spaces by maintaining and caring for the park urban tree canopy, 92 miles of hiking trails, 13 lakes, Venice Beach, and the Cabrillo Marine Aquarium.<sup>4</sup>

According to RAP, parks within the surrounding community are heavily utilized and often overburdened. However, there are several types of parks and recreational facilities that are considered community and neighborhood parks within two miles of the Project Site. **Table IV.J.4-2, Parks and Recreation Facilities Within a 2-Mile Radius of the Project Site**, lists the type of park, amenities, and approximate driving distance from the Project Site for these public parks and recreational facilities.

In addition, to the parks listed above, a park at 1st and Broadway Park is in development and will be located at 217 West 1st Street approximately 1.8 miles northwest of the Project Site and will contain 1.96 acres, and the 6<sup>th</sup> Street Park, Arts and Connectivity Project (PARC Project) is in development and will contain 12 acres of public park.<sup>5</sup> Grand Park, located approximately 1.8 miles northwest of the Project Site is operated by Los Angeles County Music Center rather than RAP. Grand Park offers 12 acres of park and recreational space for gatherings, entertainment, and leisure activities that likely attract Central City North residents.<sup>6</sup>

**Figure IV.J.4-1, Park Location Map**, shows the location of the parks identified in **Table IV.J.4-2** that are within a two mile radius of the Project Site. In addition to the 23 recreational facilities within two miles of the Project Site there are eight community parks located within a two- to three-mile radius RAP has identified an additional 22 community parks within an approximate five mile radius and 25 regional parks/facilities (including 10 individually identified facilities within Griffith Park) located within a 10-mile radius.<sup>7</sup>

<sup>4</sup> Los Angeles Department of Recreation and Parks website, Who We Are, <https://www.laparks.org/department/who-we-are>. Accessed August 22, 2022.

<sup>5</sup> City of Los Angeles, Bureau of Engineering, 6<sup>th</sup> Street Park, Arts, River, and Connectivity Improvement Project, <https://www.sixthstreetviaduct.org/parcproject>. Accessed August 22, 2022.

<sup>6</sup> County of Los Angeles, Grand Park, <https://grandparkla.org/>. Accessed August 22, 2022.

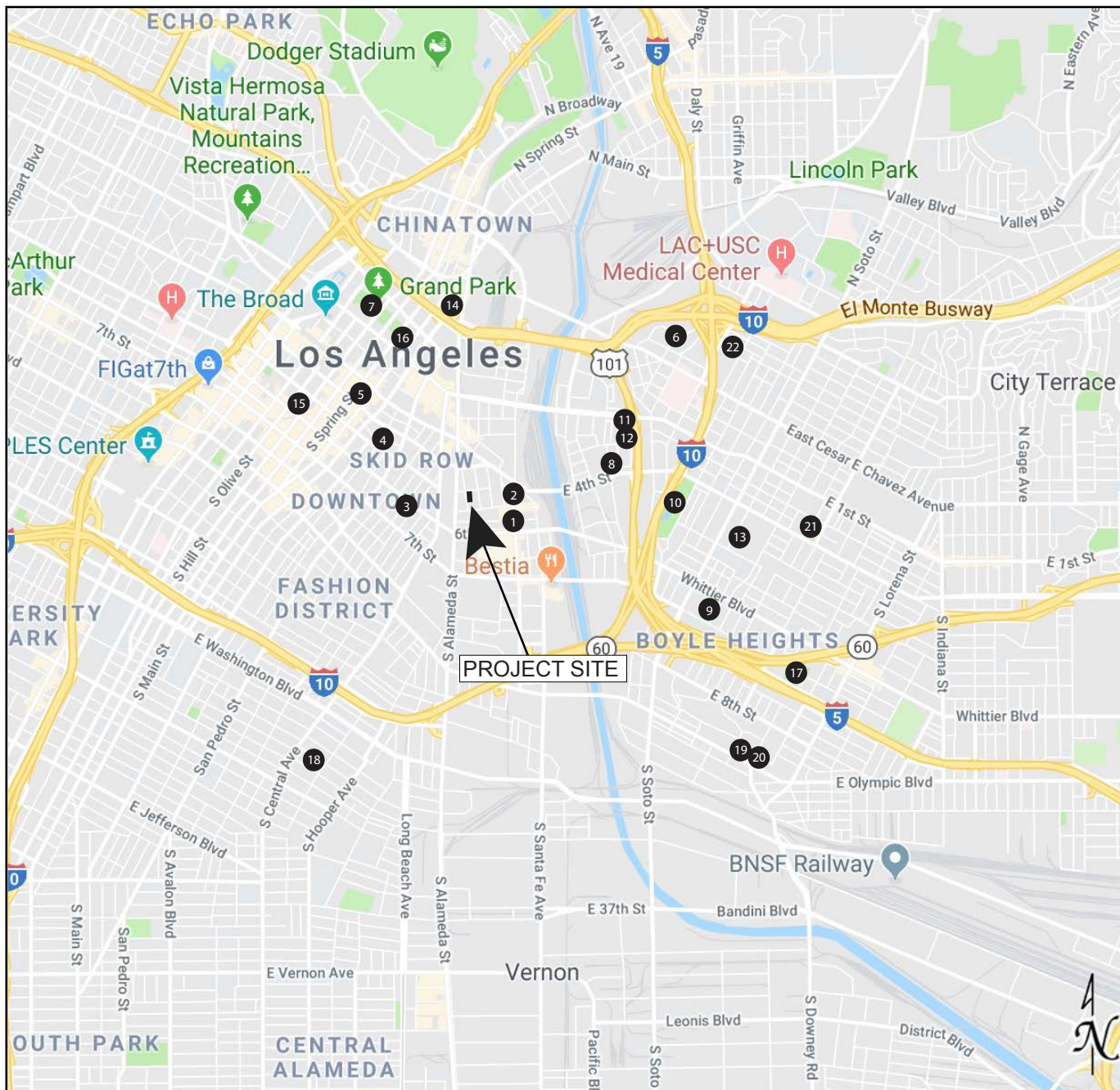
<sup>7</sup> Written correspondence Letter correspondence with Darry Ford, Senior Management Analyst I, Planning, Maintenance and Construction Branch, City of Los Angeles Department of Recreation and Parks, August 14, 2017, **Appendix K** of this Draft EIR.

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

Map No. <sup>a</sup>	Facility Name and Address	Distance from Project Site (miles) <sup>b</sup>	Type of Facility	Size (acres)	Amenities
<b>Pocket Park</b> (within 0.5 mile of Project Site)					
1	<b>Arts District Park</b> 501 S. Hewitt, LA 90013	0.1	Pocket Park	0.5	Children's Play Area, Picnic Area
2	<b>Arts District Dog Park</b> 1004 E. 4 <sup>th</sup> Street LA 90013	0.3	Dog Park	0.5	Dog Facilities
<b>TOTAL ACREAGE - POCKET PARKS</b>				<b>1.0</b>	
<b>Neighborhood Park</b> (within 2 mile of Project Site)					
3	<b>Gladys Park</b> 6 <sup>th</sup> and Gladys, LA 90021	0.5	Park	0.34	Basketball Courts, Outdoor Exercise Equipment, Picnic Tables
4	<b>San Julian Park</b> 312 E. 5 <sup>th</sup> Street, LA 90013	0.6	Park	0.29	Grass, Benches
5	<b>Spring Street Park</b> 428 South Spring Street LA 90013	0.9	Park	0.81	Children's Play area, Walking Paths, Benches, Grass Area
6	<b>Prospect Park</b> 612 N. Enchandia St. LA 90033	2	Park	2.71	Children's Playground, Benches, Grass Area
7	<b>Grand Hope Park</b> 900 South Hope St. LA 90015	2	Park	2.31	Grass, Children's Play Area, Picnic Tables
<b>TOTAL ACREAGE - NEIGHBORHOOD PARKS</b>				<b>6.46</b>	
<b>Community Park</b> (within 2 miles of Project Site)					
8	<b>Aliso Pico Recreation Center</b> 370 S. Clarence St. LA 90033	1	Recreation Center	4.47	Children's Play Area, Auditorium, Basketball Courts, Gym, Volleyball Courts, Baseball Diamond, Tennis Courts, Community Room, Educational Facility, Kitchens, Multi-Purpose Sports Field, Music Room
9	<b>City Hall Park Center</b> 200 N. Main Street LA 90012	1.1	Park	1.92	Grass Area
10	<b>Los Angeles Plaza Park</b> 125 Paseo de la Plaza LA 90012	1.1	Park	N/A	Grass Area
11	<b>Pershing Square Park</b> 532 S. Olive St. LA 90013	1.2	Park	4.4	Stage, Amphitheater, Community Room, Ice Skating Rink (Seasonal), Grass Area, Benches, Walking Paths, Children's Play Area, Pet Area
12	<b>Pecan Pool</b> 120 S. Gless Street, LA 90033	1.3	Pool	N/A	Outdoor Pool, Summer Programs, Teams, Lessons
13	<b>Pecan Recreation Center</b> 145 S. Pecan Street, LA 90033	1.3	Recreation Center	4.28	Basketball Courts, Children's Play Area, Community Room, Handball Courts, Picnic Tables, Restrooms, Volleyball Courts, Multi-purpose Sports Field, Baseball Diamond
14	<b>Hollenbeck Park, Recreation Center, Lake &amp; Skate Park</b> 415 S. Saint Louis St. LA 90033	1.4	Park, Rec Center, Lake, Skate Park	20.47	Barbecue Pits, Children's Play Area, Picnic Tables, Auditorium, Community Room, Band Shell, Kitchen, Gym, Preschool, Lake, Fishing, Skating
15	<b>Ross Valencia Community Park</b> E. 1 <sup>st</sup> Street and N. Chicago Street	1.7	Park	0.09	Grass Area

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

<b>Map No.<sup>a</sup></b>	<b>Facility Name and Address</b>	<b>Distance from Project Site (miles)<sup>b</sup></b>	<b>Type of Facility</b>	<b>Size (acres)</b>	<b>Amenities</b>
16	<b>Alpine Recreation Center</b> 817 Yale Street, LA 90012	1.8	Park	1.94	Auditorium, Basketball Courts, Children's Play Area, Volleyball Courts, Pergola, Grass Area,
17	<b>Los Angeles State Historic Park</b> 1245 N. Spring Street, LA 90012	1.8	Park	34	Grass Areas, Public Art, Fruit Trees, Walking/Running Trail, Community Events
18	<b>Boyle Heights Sports Center</b> 933 S. Mott, LA 90023	1.9	Sports Complex	7.22	Barbecue Pits, Baseball Diamonds, Basketball Courts, Children's Play Area, Community Room, Picnic Tables, Track Field, Jogging Path, Multipurpose Sports Field,
19	<b>Central Park Recreation Center</b> 1357 E. 22 <sup>nd</sup> Street, LA 90011	1.9	Recreation Center/ Summer Pool	1.65	Basketball Courts, Children's Play Area, Kitchen, Stage, Preschool Room, Computer Lab, Sports Fields, Community Programs
20	<b>Miguel Contreras Learning Center Pool</b> 322 S. Lucas, LA 90017	1.9	Pool	0.66	Community/High School Pool
21	<b>Roosevelt Pool</b> 456 S. Mathews St., LA 90033	1.9	Pool	1.5	Year Round Pool, Youth and Adult Programs, Teams, Lessons, Classes
22	<b>Vista Hermosa Park/Soccer Field</b> 1301 W. 1 <sup>st</sup> Street, LA 90026	1.9	Park/ Soccer Field	10.5	Grass Fields, Amphitheater, Picnic Areas, Children's Playground, Soccer Field
23	<b>State Street Recreation Center</b> 716 N. State Street, LA 90033	2	Recreation Center	2.62	Auditorium, Baseball Diamond, Basketball Courts, Children's Play Area, Community Room, Kitchen, Multipurpose Sports Field, Stage,
<b>TOTAL ACREAGE - COMMUNITY PARKS</b>					<b>95.72</b>
<i>a</i>	<i>Map numbers correspond with map Figure IV.J.4-1</i>				
<i>b</i>	<i>Measured in driving/walking distances using Google Maps.</i>				
<i>N/A</i>	<i>Data Not Available</i>				
<b>Sources:</b>	<i>City of Los Angeles, Department of Recreation and Parks Facility Locator; Los Angeles Countywide Comprehensive Parks &amp; Recreation Needs Assessment, May 3, 2016; Written correspondence Letter correspondence with Darry Ford, Senior Management Analyst I, Planning, Maintenance and Construction Branch, City of Los Angeles Department of Recreation and Parks, August 14, 2017, <b>Appendix K</b> of this Draft EIR.</i>				



Source: Google Maps, April 2019.

1. **Arts District Park:** 501 S. Hewitt
2. **Arts District Dog Park:** 1004 E. 4th St.
3. **Gladys Park:** 6th and Gladys
4. **San Julian Park:** 312 E. 5th Street
5. **Spring Street Park:** 428 South Spring St.
6. **Prospect Park:** 612 N. Enchandia St.
7. **Grand Hope Park:** 900 South Hope St.
8. **Aliso Pico Recreation Center:**  
370 S. Clarence St
9. **Boyle Heights Sports Center:** 933 S. Mott
10. **Hollenbeck Park, Recreation Center,  
Lake & Skate Park:** 415 S. Saint Louis St.
11. **Pecan Recreation Center:** 145 S. Pecan St.
12. **Pecan Pool:** 120 S. Gless St.
13. **Roosevelt Pool:** 456 S. Mathews St.
14. **Los Angeles Plaza Park:**  
125 Paseo de la Plaza
15. **Pershing Square Park :** 532 S. Olive St.
16. **City Hall Park Center:** 200 N. Main St.
17. **Monsignor Ramon Garcia Recreation  
Center:** 1016 S. Fresno St.
18. **Central Park Recreation Center:**  
1357 E. 22nd St.
19. **Costello Senior Citizen Center:**  
3121 E. Olympic Blvd.
20. **Lou Costello Recreation Center:**  
3141 E. Olympic Blvd.
21. **Boyle Heights Sr. Citizen Center:**  
2839 E. 3rd St.
22. **State Street Recreation Center:**  
716 N. State St.

Figure IV.J.4-1  
Park Location Map

The Project is located in an area of the City that is below the City's standard for neighborhood and community park acreage. As previously stated, the City's standard ratio of neighborhood and community parks to population is four acres per 1,000 people, pursuant to the PRP. The Central City North Community Plan Area, which includes the project area, has 0.84 acres of neighborhood and community park acreage per 1,000 people. The facilities in this area with active recreational features are very heavily used.<sup>8</sup>

While there are no regional parks within the Central City North Community Plan area, Regional Parks have a service radius encompassing the entire Los Angeles region. The closest City regional parks, Ernest E. Debs Regional Park and Griffith Park are within five and seven miles of the Project Site, respectively. The 282-acre Ernest E. Debs Regional Park offers trails in an urban wilderness preservation area, community and gathering areas, ball fields, and a nature center managed by the Audubon Society.<sup>9,10</sup> The 4,511-acre Griffith Park, one of the largest municipal parks in the U.S. and the largest historic landmark in the City, offers numerous family attractions, an assortment of educational and cultural institutions, and more than 70 miles of hiking and equestrian trails.<sup>11</sup> Furthermore, as previously mentioned, the 6<sup>th</sup> Street Park, Arts and Connectivity Project (PARC Project) is in development and will contain 12 acres of public park.<sup>12</sup> The PARC Project includes the creation of public recreational space in areas underneath and adjacent to the Sixth Street Viaduct, including park space between the Los Angeles River and Mateo Street in the Arts District.

For a comprehensive list refer to the correspondence from RAP in **Appendix K**, Public Service Correspondence, of this Draft EIR.

### 3. Project Impacts

#### a) Thresholds of Significance

In accordance with guidance provided in Appendix G to the *State CEQA Guidelines*, the Project could have a significant impact if it were to:

***Threshold (a): Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service***

<sup>8</sup> Letter correspondence with Darry Ford, Senior Management Analyst I, Planning, Maintenance and Construction Branch, City of Los Angeles Department of Recreation and Parks, August 14, 2017, **Appendix K** to this Draft EIR.

<sup>9</sup> Debs Park Advisory Board, Framework Plan, Introduction, <http://www.debspark.org/framework16.html>. Accessed August 22, 2022.

<sup>10</sup> Audubon Center at Debs Park, Visit Our Center, <https://debspark.audubon.org/visit>. Accessed August 22, 2022.

<sup>11</sup> City of Los Angeles Department of Recreation and Parks, Griffith Park, Map & Guide, 2016, <https://www.laparks.org/griffithpark/pdf/GriffithParkMap.pdf>. Accessed August 22, 2022.

<sup>12</sup> City of Los Angeles, Bureau of Engineering, 6<sup>th</sup> Street Park, Arts, River, and Connectivity Improvement Project, <https://www.sixthstreetviaduct.org/parcproject>. Accessed August 22, 2022.

***ratios, response times or other performance objectives for parks; or***

***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; or***

***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 are relied upon. The analysis utilizes factors and considerations identified in the *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 criteria to evaluate parks and recreation impacts:

### (1) Population Growth

- *The net population increase resulting from the proposed project.*

### (2) Parks and Recreation Services

- *The demand for recreation and park services anticipated at the time of project buildout 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 recreation 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 environmental impacts of a project with respect to parks and recreational facilities are determined based on the ability of existing parks and recreational facilities in a Project area to accommodate a project's needs for such facilities. This is calculated based on the City's recommended ratios for parkland to population as well as project-specific recommendations of RAP. Based on this evaluation, a determination is made whether a project would create substantial demands on existing parks and recreational facilities such that new or expanded parks and recreational facilities would be needed either on-site or off-site.

## **c) Project Design Features**

Construction and operation of the Project would be implemented in accordance with applicable regulatory and code requirements related to parks and recreation. No specific project design



features beyond the open space and recreation features described in **Section II, Project Description**, of this Draft EIR are proposed with regard to parks and recreation.

## d) Analysis of Project Impacts

As compared to the Project, the Flexibility Option would change the use of the second floor from residential to commercial, and would not otherwise change the Project's land uses or size. The overall commercial square footage provided would be increased by 17,765 square feet to 64,313 square feet and, in turn, there would be a reduction in the number of live/work units from 220 to 200 units and a decrease in the number of bicycle spaces from 180 to 179. The overall building parameters would remain unchanged and the design, configuration, and operation of the Flexibility Option would be comparable to the Project. In the analysis of Project impacts presented below, where similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option would be essentially the same, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option. For those thresholds where numerical differences exist because of the differences in project parameters between the Project and Flexibility Option, the analysis is presented separately.

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

**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?*

**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?*

Numerical differences exist for these thresholds because of the differences in project parameters between the Project and Flexibility Option, therefore these analyses are presented separately.

### (1) Impact Analysis

#### (a) Project

##### (i) 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 the Los Angeles and Southern California area, where they move from construction site to construction



site, and as the length of construction jobs is varied, the likelihood that construction workers would relocate their households as a consequence of working on the Project is negligible. Therefore, the construction workers associated with the Project would not result in a notable increase in the residential population of the Project area, or a corresponding permanent demand for parks and recreation facilities in the vicinity of the Project Site.

During Project construction, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. There is a potential for construction workers to spend their lunch breaks at the parks and recreational facilities near the Project Site, specifically the Arts District Park, approximately 0.3 mile north of the Project Site. However, any resulting increase in the use of nearby parks and recreational facilities would be temporary and would be expected to occur during off-peak park usage hours (i.e., when most potential park patrons are at work or school). Furthermore, it is unlikely that workers would utilize parks and recreational facilities beyond a 0.5-mile radius from the Project Site (all other parks as shown in **Table IV.J.4-2** above), as lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the typically allotted time (e.g., 30 to 60 minutes). Therefore, any resulting increase, if any, in the use of such parks and recreational facilities would be temporary and negligible. **Therefore, impacts on parks and recreational facilities during Project construction would be less than significant; no mitigation measures would be required.**

(ii) *Operation*

a. Public Recreation Plan

As previously discussed, the PRP's desired long-range standard for local parks is based on a minimum of two acres per 1,000 persons for neighborhood parks with a service radius of 0.5 mile, a minimum of two acres per 1,000 persons for community parks with a service radius of two miles and six acres per 1,000 persons of regional parkland. However, the PRP also notes that the long range standards may not be reached during the life of the plan, and, therefore, includes more attainable short- and intermediate-range standards of one acre per 1,000 persons within a one-mile service radius for neighborhood parks and one acre per 1,000 persons within a two-mile service radius for community parks (the PRP does not provide a short-or intermediate-range standard for regional parks). As stated above, the Central City North Community Plan Area currently does not meet the PRP's guidelines.

Based on the Project's 518 estimated new residents (refer to **Section IV.I, Population and Housing**) and the PRP's long-range standards, the Project would generate demand for 1.0 acres each of neighborhood and community parkland and 3.1 acres of regional parkland for a total of 4.1 acres meet the PRP's long-range standards. In accordance with the Public Recreation Plan's more attainable short- and intermediate-range standards, the Project would generate demand for 0.52 acre each of neighborhood and community parks and facilities in addition to the 3.1 acres of regional parkland for a total of 3.62 acres.

The Project would include a total of approximately 22,725 square feet (0.52 acres) of useable open space which would fall short of the PRP Recreation Plan’s long-, intermediate- and short-range guidelines for neighborhood sites and facilities, community sites and facilities, and regional recreational sites and facilities. However, as previously stated, the Public Recreation Plan parkland guidelines are Citywide goals and do not constitute requirements for individual development projects. Furthermore, the intent of the Public 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. As previously discussed, such requirements include payment of applicable Quimby/Finn fees<sup>13</sup> and/or the Dwelling Unit Construction Tax<sup>14</sup> to the City.

b. Los Angeles Municipal Code

The Project’s required amount of open space was calculated pursuant to LAMC Section 12.21 G.2, based on the total number of units. As shown in **Table IV.J.4-3**, the Project is required to provide approximately 24,125 square feet of open space. As set forth in LAMC Section 12.22 A.25, because the Project is setting aside 11 percent of its proposed units (approximately 25 live/work units) for Very Low Income households, the Project qualifies for “on-menu” incentives.<sup>15</sup> Specifically, the Project Applicant is requesting to utilize an on-menu incentive for up to a 20 percent reduction in the amount of required open space. After taking into account the requested open space reduction, the Project would be required to provide approximately 22,725 square feet of open space.

**Table IV.J.4-3  
Project Open Space Summary**

Land Use	Amount
<b>Open Space</b>	
Private Open Space	950 sf
Outdoor Common Open Space	18,669 sf
Indoor Common Open Space	3,106 sf
<b>Total Open Space</b>	<b>22,725 sf</b>
191 units (studio- 1 bedroom) x 100 square feet	19,100 sf
29 units (3 bedrooms) x 175 square feet	5,075 sf
<b>Required Open Space Without Density Bonus</b>	<b>24,125 sf</b>
<b>Required Open Space With Density Bonus</b>	<b>22,725 sf</b>
<i>du = dwelling units; sf = square feet</i>	
<i>Source: HansonLA Architecture, September 2022.</i>	

The Project includes 220 residential units and will provide common open space in conformance with LAMC Section 12.21 G. The Project would provide a variety of active and passive open

<sup>13</sup> LAMC Sections 12.33 and 17.12, <https://planning.lacity.org/ordinances/docs/ParksDedication/updateOrdinance.pdf>, Accessed August 22, 2022.

<sup>14</sup> LAMC Section 21.10.3(a)(1), [https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lamc/0-0-0-127156](https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-127156). Accessed August 22, 2022.

<sup>15</sup> “On-menu” incentives refer to those incentives that are specifically enumerated in the City’s Density Bonus Ordinance.

space and recreational amenities to serve the needs of Project residents and visitors. The open space and residential amenities would be located in several distinct areas, generally located on the ground, second, and eighth level. As identified in **Section II, Project Description**, of this Draft EIR, the Project would include 22,725 square feet of usable open space of which approximately 18,669 square feet would be outdoor common space, 3,106 square feet would be indoor common space and 950 square feet of private open space. The Project's various amenities would include including a swimming pool and deck, outdoor areas for lounging, indoor amenities, such as fitness and recreational rooms, a resident art gallery, plaza and pedestrian areas and many units would include private balconies. The Project would also provide a minimum of 57 trees in the common outdoor spaces.

In addition to the Project's provision of open space, to alleviate the Project's demand on City parks and recreational facilities, the Applicant would be required to dedicate parkland or pay Quimby/Finn fees to the City to satisfy its obligations under LAMC Sections 17.12 and 12.33, as discussed under the Regulatory Framework subsection above. Therefore, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities.

#### c. Central City North Community Plan

The Project would support the objectives and policies of the Central City North Community Plan through the provision of on-site open space, recreational amenities and landscaping, as discussed above, which would partially offset the demand that would be generated by Project residents for public parks and recreational facilities in the Central City North Community Plan area. The majority of the objectives and policies of the Central City North Community Plan regarding parks and recreation identified in the Regulatory Framework subsection above are applicable to the City, but not to individual development projects. Objective 4-1 calls for the conservation, maintenance and better utilization of existing facilities and Objective 5-1 calls for the preservation of open space resources and where possible develop new open space. The Project would support these objectives indirectly by providing on-site open space and recreational facilities that would partially reduce demand on the existing parks and recreational facilities in the Central City North Community Plan area. The Project would support Objective 5-1 with the provision of on-site open space and recreational amenities (e.g., swimming pool and spa, fitness and recreation rooms, courtyard with planters for cultivating fruits and vegetables, arts and production space, yoga deck, outside dining area, and terraces). This provision of on-site open space and recreational amenities would offset the demand that would be generated by the Project residents for public parks and recreational amenities in the Central City North Community Plan area. In addition, the Project would be required to pay Quimby/Finn fees to the City to satisfy its obligations under the Quimby Act and/or payment of a Dwelling Unit Construction Tax to reduce impacts on park facilities to less than significant. Therefore, Project development would not diminish the quality or accessibility of, or result in the removal of, existing parks or recreational facilities in the Central City North Community Plan area. As such, the Project would not conflict with the parks and recreation policies of the Central City North Community.

Since the Project would support the objectives and policies of the Central City North Community Plan through the provision of on-site open space, recreational amenities and landscaping, and would include payment of applicable Quimby/Finn fees or the Dwelling Unit Construction Tax, the Project would not (a) cause a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks; (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; or (c) include recreational facilities or require the construction or expansion of recreational facilities; which might have an adverse physical effect on the environment.

(b) *Flexibility Option*

(i) *Construction*

Similar to the Project, the construction workers associated with the Flexibility Option would not relocate their households and they would not result in a notable increase in the residential population of the Project area, or a corresponding permanent demand for parks and recreation facilities in the vicinity of the Project Site. Therefore, similar to the Project, any resulting increase, if any, in the use of such parks and recreational facilities would be temporary and negligible. **Therefore, impacts on parks and recreational facilities resulting from construction of the Flexibility Option would be less than significant; no mitigation measures would be required.**

(ii) *Operation*

a. *Public Recreation Plan*

Based on the Flexibility Option's 470 estimated new residents (refer to **Section IV.I, Population and Housing**, of this Draft EIR) and the PRP's long-range standards, the Flexibility Option would generate demand for 0.94 acre each of neighborhood and community parkland and 2.8 acres of regional parkland for a total of 3.74 acres to meet the PRP's long-range standards. In accordance with the Public Recreation Plan's more attainable short- and intermediate-range standards, the Project would generate demand for 0.47 acre each of neighborhood and community parks and facilities in addition to the 2.8 acres of regional parkland for a total of 3.86 acres.

Similar to the Project, the Flexibility Option would include a total of approximately 22,725 square feet (0.52 acres) of useable open space which would fall short of the PRP Recreation Plan's long, intermediate- and short-range guidelines for neighborhood sites and facilities, community sites and facilities, and regional recreational sites and facilities. However, as previously stated, the PRP parkland guidelines are Citywide goals and do not constitute requirements for individual development projects. Furthermore, 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. As previously discussed, such

requirements include payment of applicable Quimby/Finn fees<sup>16</sup> and/or the Dwelling Unit Construction Tax<sup>17</sup> to the City.

b. Los Angeles Municipal Code

The Flexibility Option includes 200 residential units and will provide common open space in conformance with LAMC Section 12.21 G. As shown in **Table IV.J.4-4**, the Flexibility Option is required to provide approximately 22,025 square feet of open space. The amount of common open space provided under the Flexibility Option would be the same as the Project without the Flexibility Option.

**Table IV.J.4-4  
Flexibility Option Open Space Summary**

Land Use	Amount
<b>Open Space</b>	
Private Open Space	950 sf
Outdoor Common Open Space	18,669 sf
Indoor Common Open Space	3,106 sf
<b>Total Open Space Provided</b>	<b>22,725 sf</b>
173 units (studio- 1 bedroom) x 100 square feet	17,300 sf
27 units (3 bedrooms) x 175 square feet	4,725 sf
<b>Required Open Space Without Density Bonus</b>	<b>22,025 sf</b>
<i>du = dwelling units; sf = square feet</i>	
<i>Source: HansonLA Architecture, September 2022.</i>	

To alleviate the demand on City parks and recreational facilities, the Applicant would be required to dedicate parkland or pay Quimby/Finn fees to the City to satisfy its obligations under LAMC Sections 17.12 and 12.33, as discussed under the Regulatory Framework subsection above. Therefore, the Flexibility Option would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities.

c. Central City North Community Plan

Similar to the Project, the Flexibility Option would support the objectives and policies of the Central City North Community Plan through the provision of on-site open space, recreational amenities and landscaping, as discussed above, which would partially offset the demand that would be generated by residents for public parks and recreational facilities in the Central City North Community Plan area. Similar to the Project, the Flexibility Option would support Objective 5-1 with the provision of on-site open space and recreational amenities (e.g., swimming pool and spa, fitness and recreation rooms, courtyard with planters for cultivating fruits and vegetables, arts and production space, yoga deck, outside dining area, and terraces). This provision of on-site open space and recreational amenities would offset the demand that would be generated by the

<sup>16</sup> LAMC Sections 12.33 and 17.12, <https://planning.lacity.org/ordinances/docs/ParksDedication/updateOrdinance.pdf>, Accessed August 22, 2022.

<sup>17</sup> LAMC Section 21.10.3(a)(1), [https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lamc/0-0-0-127156](https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-127156). Accessed August 22, 2022.

Flexibility Option residents for public parks and recreational amenities in the Central City North Community Plan area. In addition, the Flexibility Option would be required to pay Quimby/Finn fees to the City to satisfy its obligations under the Quimby Act and/or payment of a Dwelling Unit Construction Tax to reduce impacts on park facilities to less than significant. Therefore, development would not diminish the quality or accessibility of, or result in the removal of, existing parks or recreational facilities in the Central City North Community Plan area.

**Since the Flexibility Option would support the objectives and policies of the Central City North Community Plan through the provision of on-site open space, recreational amenities and landscaping, and would include payment of applicable Quimby/Finn fees or the Dwelling Unit Construction Tax, the Flexibility Option would not (a) cause a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks; (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; or (c) include recreational facilities or require the construction or expansion of recreational facilities; which might have an adverse physical effect on the environment.**

## (2) Mitigation Measures

Project-level impacts for the Project and the Flexibility Option, with regard to service ratios of parks and recreation facilities and construction of new parks and recreational facilities would be less than significant; no mitigation measures would be required.

## (3) Level of Significance After Mitigation

Project-level impacts for the Project and the Flexibility Option, with regard to parks and recreation facilities would be less than significant without mitigation.

# 4. Cumulative Impacts

Due to the similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option, the impacts of the Project and the Flexibility Option related to contributions to cumulative impacts would be essentially the same. Therefore, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option.

## a) Impact Analysis

Implementation of the Project in combination with the 17 Related Projects identified in **Section III, Environmental Setting**, of this Draft EIR, would further increase demand for park and recreational facilities. Employees generated by the commercial projects would be expected to have limited use of public parks and recreational facilities during regular office hours and would be more likely to utilize parks and recreational facilities near their places of residence. However, the increase in residential population from the Project and Related Projects would increase the

demand for parks and recreation facilities and further impact the shortage of park/recreational space in the downtown area. However, pursuant to the LAMC, the Related Projects would also be required to provide open space, active or passive and the majority of the residential projects would likely provide recreational amenities such as gyms or pools for the residents alleviating some demand on public parks. In addition, future impacts on park facilities would be mitigated through the collection of park fees on new development and the provision of parkland pursuant to the City's regulatory requirements. These requirements include payment of Quimby/Finn fees<sup>18</sup> and/or the Dwelling Unit Construction Tax,<sup>19</sup> as discussed under the Regulatory Framework subsection above. Adherence to the requirements of the City's regulatory requirements would constitute implementation or funding of the Project's fair share of measures designed to alleviate the cumulative impact, and in accordance with *State CEQA Guidelines* Section 15130(a)(3), the Project's contribution to the cumulative impact would therefore be less than cumulatively considerable. **Therefore, cumulative impacts of the Project and Flexibility Option on recreation and parks would be less than significant.**

## b) Mitigation Measures

Cumulative impacts related to parks and recreational facilities for both the Project and Flexibility Option would be less than significant; no mitigation measures would be required.

## c) Level of Significance After Mitigation

Cumulative impacts related to parks and recreational facilities for both the Project and Flexibility Option were determined to be less than significant without mitigation.

<sup>18</sup> LAMC Sections 12.33 and 17.12, <https://planning.lacity.org/ordinances/docs/ParksDedication/updateOrdinance.pdf>, Accessed August 22, 2022.

<sup>19</sup> LAMC Section 21.10.3(a)(1), [https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lamc/0-0-0-127156](https://codelibrary.amlegal.com/codes/los_angeles/latest/lamc/0-0-0-127156). Accessed August 22, 2022.