

IV. Environmental Impact Analysis

L.4 Public Services – Parks and Recreation

1. Introduction

This section describes the existing parks and recreation setting of the Project Site and vicinity, identifies associated regulatory requirements, and evaluates the potential impacts related to implementation of the proposed Project. Specifically, this section describes the potential impacts of the Project on parks and recreational facilities in the Project area and focuses on whether existing parks or facilities are sufficient to accommodate the growth that could potentially be generated by the Project. This section uses information from the City of Los Angeles Department of Recreation and Parks (RAP) website.

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:

- City Charter
- General Plan Framework and Open Space Elements
- Public Recreation Plan
- Health and Wellness Element
- Park Proud LA Strategic Plan 2018-2022
- Citywide Community Needs Assessment

(1) Local

(a) City Charter

Per City Charter Article V, Section 590, the RAP was formed to establish, construct, maintain, operate and control all parks, recreational facilities, museums, observatories, sports centers, and land utilized for public recreation in the City of Los Angeles (City). The

RAP was established to promote public recreation and cooperate with other public agencies and organizations for that purpose.¹

(b) General Plan Framework and Open Space Elements

The General Plan Framework Element (Framework Element), Chapter 9, Infrastructure and Public Services, contains policies and objectives that address the provision of parks and open space within the City. These standards address the following three issues: (1) sufficient land area reserved for parks and recreation, (2) appropriate distribution of park and recreational facilities throughout the City, and (3) a full complement of park and recreational facility types to accommodate a wide variety of users.²

The Open Space and Conservation Elements of the General Plan call for the use of open space to enhance community and neighborhood character. The policies of these elements recognize that there are communities where open space and recreational resources are currently in short supply and, therefore, suggest that vacated railroad lines, drainage channels, planned transit routes and utility rights-of-way, or pedestrian-oriented streets and small parks, where feasible, might serve as important resources for serving the open space and recreation needs of residents.³

(c) Public Recreation Plan

The City's Public Recreation Plan (PRP) is a component of the City's General Plan and sets forth recreation guidelines intended to provide a basis for satisfying the needs for City recreational sites. The PRP was adopted in 1980 by the City's City Council and amended in March 2016 to modernize its recommendations and provide more flexibility and equity in the distribution of funds used for the acquisition and development of recreational resources. The PRP addresses the need for publicly accessible neighborhood, community, and regional recreational sites and facilities across the City. The PRP guidelines are not intended to set an upper limit for the areas of parks, recreational sites, or other types of open space. Instead, they are intended to provide the City with a flexible and broad range of options on how park expenditures can be spent across the City. An overall provision of 10 acres of land per 1,000 persons for total recreational sites and facilities is recommended under City policy guidelines in the PRP. A minimum of 10 percent of the total land area should be in public recreation or open space.⁴

¹ City of Los Angeles, City of Los Angeles Charter, Volume 1 Governance, current through December 31, 2020.

² City of Los Angeles, The Citywide General Plan Framework Element, Chapter 9 Infrastructure and Public Services, readopted August 8, 2001.

³ City of Los Angeles, Conservation Element of the City of Los Angeles General Plan, adopted September 26, 2011; Open Space Plan, an Element of the General Plan, June 1973.

⁴ City of Los Angeles, Public Recreation Plan, Los Angeles General Plan, as amended by resolution, August 11, 2016.

The recommended service levels for neighborhood sites and facilities is 2 acres per 1,000 residents. The recommended service levels for community sites and facilities are 2 acres per 1,000 residents. The recommended service levels for regional recreational sites and facilities are 6 acres per 1,000 residents.⁵ However, these long-range Citywide goals do not apply to individual projects. Recreational facilities and services should be provided for all segments of the population on the basis of present and future projected needs, the local recreational standards, and the City's ability to finance those facilities and services.

(d) 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 1,000 residents (excluding regional parks and open spaces).
- Increase access to parks so that 75 percent of all residents are within a 0.25-mile walk of a park or open space facility.
- Increase the number of schools (public, private, and charter) that have shared use agreements for community use outside of normal school hours by 25 percent.
- Increase the miles of the Los Angeles River that are revitalized for natural open space and physical activity, particularly in low-income areas.
- Increase the number of parks that feature or incorporate universally-accessible features.
- Improve the percentage of citywide population meeting physical fitness standards per week so that 50 percent of the population meets physical activity guidelines.

(e) Park Proud LA Strategic Plan 2018–2022

The Park Proud LA Strategic Plan (Strategic Plan) is the most recent strategic plan for the 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

⁵ Neighborhood, community, and regional sites and facilities are defined in the City of Los Angeles Public Recreation Plan, Los Angeles General Plan.

accessible, equitable, and first-class park system. The Strategic Plan reflects chief priorities of the 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 goals⁶:

- 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.

(f) Citywide Community Needs Assessment

In 2009, the RAP completed the Citywide Community Needs Assessment to “preliminarily prioritize and address the tremendous needs for additional recreation and park land, to identify existing facilities needing improvements to meet current and future community needs, to identify recreation program needs, to perform demographic analysis, to prevent future maintenance problems, and to offer positive alternatives to an increasingly dense and urbanized population.” The report provided a more current assessment of existing conditions and future needs than the PRP. Based on the existing supply of park and recreational facilities, the Citywide Community Needs Assessment recommended a service level of 10.60 acres of park land per 1,000 persons Citywide, including 0.10 acre of mini parks (i.e., parks less than 1 acre in size), 1.50 acres of neighborhood parks, 2 acres of community parks, and 6 acres of regional and large urban parks.⁷

b) Existing Conditions

The RAP manages all municipally owned and operated recreation and park facilities within the City.⁸ **Table IV.L.4-1** below lists the nine pocket parks, neighborhood parks, recreation centers, and regional parks located within the Hollywood Community Plan area and serving the Project Site, as provided by the General Plan Framework Environmental Impact Report (EIR) (refer also to **Figure IV.L.4-1**, Parks and Recreation Facilities Serving the Project Area).

⁶ City of Los Angeles, Park Proud LA Strategic Plan 2018 – 2022, August 2018.

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

⁸ Los Angeles Department of Recreation and Parks, Who We Are, 2021.

**TABLE IV.L.4-1
PARKS AND RECREATION FACILITIES SERVING THE PROJECT AREA**

Park/Recreation Facility Name	Park Type	Location	Approximate Distance to the Project Site (miles)	Size of Facility (Acres)
Barnsdall Art Park	Community Park	4800 Hollywood Boulevard, Los Angeles, CA 90027	0.17	14.29
Bellevue Recreation Center	Neighborhood Park	826 Lucile Avenue, Los Angeles, CA 90026	1.29	9.11
De Longpre Park	Neighborhood Park	1350 N. Cherokee Avenue, Los Angeles, CA 90028	2.28	1.37
Griffith Park	Regional Park	2800 East Observatory Road, Los Angeles, CA 90027	0.86	4,066.03
Hollywood Recreation Center	Neighborhood Park	1122 Cole Avenue, Los Angeles, CA 90038	2.03	1.29
La Mirada Park	Neighborhood Park	5401 La Mirada Avenue, Los Angeles, CA 90029	0.85	0.17
Lemon Grove Recreation Center	Neighborhood Park	4959 Lemon Grove Avenue, Los Angeles, CA 90029	0.92	3.53
Lexington Avenue Pocket Park	Neighborhood Park	5523 Lexington Avenue, Los Angeles, CA 90038	1.04	0.17
Madison West Park	Neighborhood Park	464 North Madison Avenue, Los Angeles CA 90004	1.18	0.52
Seily Rodriguez Park	Neighborhood Park	5707 Lexington Avenue, Los Angeles, CA 90038	1.25	0.34

SOURCES: City of Los Angeles Department of Parks and Recreation, Parks, 2018; Los Angeles County, Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment, Appendix A: City of LA Hollywood – South Study Area Profile, May 2016; City of LA Hollywood – North Study Area Profile, May 2016; City of LA Wilshire – Koreatown Area Profile, May 2016; City of LA Silver Lake, Echo Park, Elysian Valley Area Profile, May 2016.

3. Project Impacts

a) Thresholds of Significance

In accordance with the State California Environmental Quality Act (CEQA) Guidelines Appendix G (Appendix G), the Project would have a significant impact related to parks and recreation if it would:

Threshold (a): Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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; 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.

This analysis relies on the Appendix G Thresholds. The analysis uses factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions:

- The net population increase resulting from the proposed project;
- 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 the RAP. Based on this evaluation, a determination is made as to 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

No project design features are proposed with regards 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 governmental facilities, or the 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?

(1) Impact Analysis

(a) Construction

As shown above in Table IV.L.4-1, Parks and Recreation Facilities Serving the Project Area, there are nine parks located within the Hollywood Community Plan area that serve the Project Site, as provided by the Los Angeles Citywide General Plan Framework EIR⁹ (also see Figure IV.L.4-1, Park Location Map).

Construction of the Project would generate part-time and full-time construction jobs during the duration of the construction period. However, because the Project would be implemented in three phases between 2020 to 2028, and most/all of the construction workers would not be needed continuously and only for varying portions of the Project phases, it is reasonable to assume that construction workers would work on construction sites, including the Project Site, on a temporary basis only, and thus, are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. The use of public parks and recreational facilities by construction workers would 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 spend their

⁹ City of Los Angeles, Los Angeles Citywide General Plan Framework, Final Environmental Impact Report, June 1996.

lunch breaks at parks and recreational facilities near the site, such as Barnsdall Art Park, the resulting increase would be temporary and negligible.

Therefore, Project construction would not cause a significant increase in resident population or corresponding parks use, which would result in substantial adverse physical impacts associated with the provision of new or physically altered parks and recreation facilities, or the need for new or physically altered parks and recreation facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for such facilities. Therefore, Project construction impacts associated with parks and recreation facilities are considered less than significant.

(b) Operation

As discussed above, the Citywide Community Needs Assessment recommended a service level of 10.60 acres of park land per 1,000 persons Citywide, including 0.10 acres of mini parks (i.e., parks less than 1 acre in size), 1.50 acres of neighborhood parks, 2 acres of community parks, and 6 acres of regional and large urban parks.¹⁰

The Project is located in the Hollywood South study area as identified in the Los Angeles Countywide Comprehensive Park & Recreation Needs Assessment (PNA). According to this assessment, the Hollywood South area currently has a population of 104,938 residents and 28 acres of park and recreation facilities. Therefore, the Hollywood South study area has a ratio of 0.3 park acres per 1,000 residents. This is below the Citywide Community Needs Assessment's recommended service level of 10.60 acres of park land per 1,000 persons.

As discussed in Section IV.J, Population and Housing, of this Draft EIR, the Project would not include a residential component, and would not directly generate population growth. While it is possible that some of the new employees that would be generated by the Project may utilize local parks and recreational facilities during work breaks, this increased demand would be negligible due to the amount of time it would take for employees to access off-site local parks.

Further, even if all 1,807 Project jobs are taken by employees that are new transplants to the surrounding area patronizing park and recreation facilities, an increase of 1,807 employees would represent 1.4 percent of the total service population for the park and recreation facilities serving the Hollywood South area.

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

Therefore, while the Project's employment opportunities could have the potential to indirectly increase the population of the Hollywood Community Plan Area, new demand for public parks and recreational facilities associated with Project development would be limited. The increase in 1,807 new employees would not change the park service ratio of 0.3 park acres per 1,000 residents. This increase in employees would not substantially impact park and recreation facilities.

As described above, Project construction would not cause a significant increase in resident population or corresponding parks use, which would result in substantial adverse physical impacts associated with the provision of new or physically altered parks and recreation facilities, or the need for new or physically altered parks and recreation facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for such facilities. Therefore, Project construction impacts associated with parks and recreation facilities are considered less than significant.

(c) *Operation*

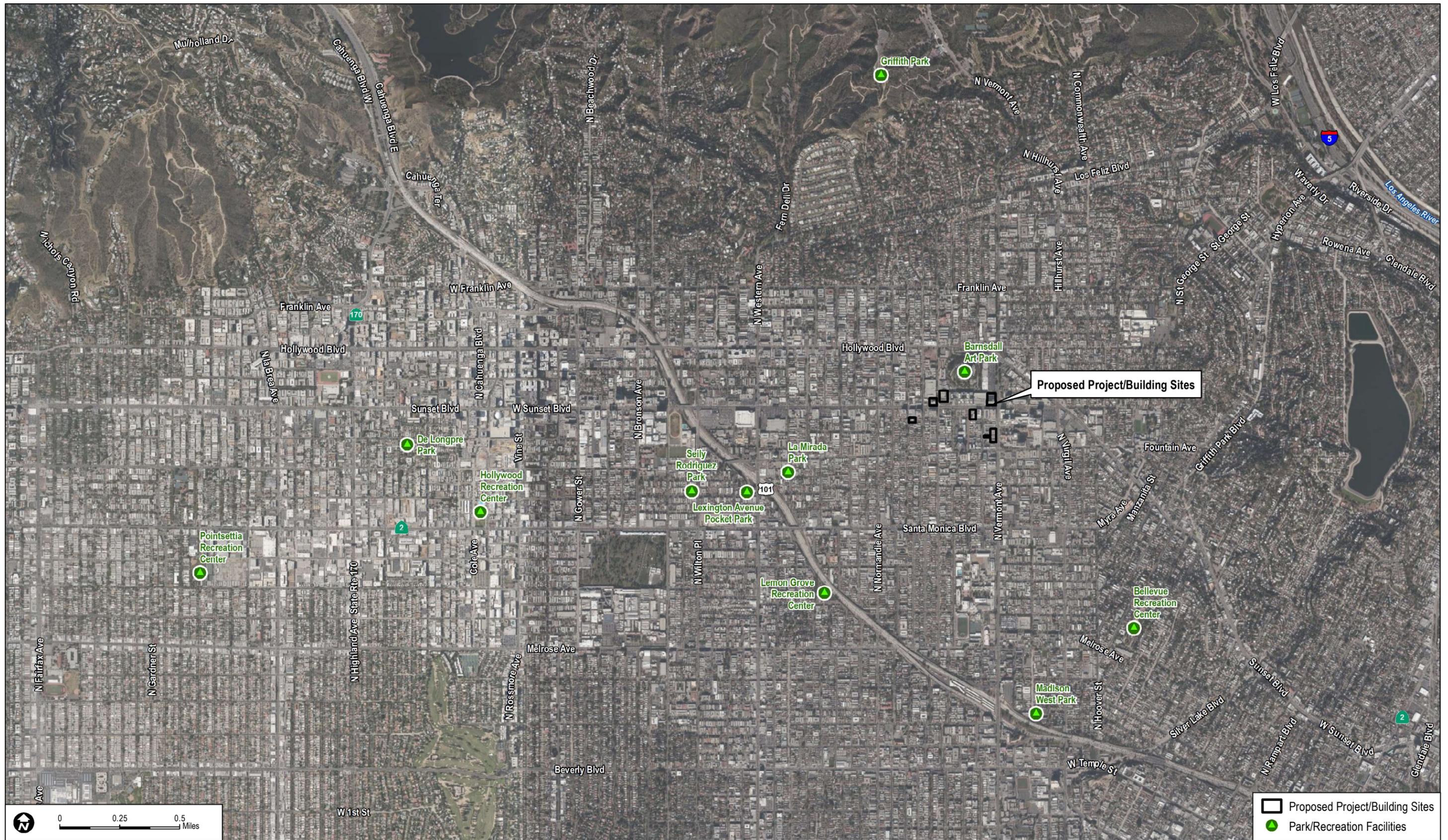
As discussed above, the Citywide Community Needs Assessment recommended a service level of 10.60 acres of park land per 1,000 persons Citywide, including 0.10 acres of mini parks (i.e., parks less than 1 acre in size), 1.50 acres of neighborhood parks, 2 acres of community parks, and 6 acres of regional and large urban parks.¹¹ As discussed in Section IV.J, Population and Housing, of this Draft EIR, the Project would not include a residential component, and therefore, would not directly generate population growth. However, the Project would generate increased employment opportunities, which could indirectly generate population growth. As shown in **Table IV.K-1** in Section IV.K, Population and Housing, of this Draft EIR, the Project could generate approximately 1,807 new employees.

The Project is located in the Hollywood South study area as identified in the Los Angeles Countywide Comprehensive Park and Recreation Needs Assessment (PNA). According to this assessment, the Hollywood South area currently has a population of 104,938 residents and 28 acres of park and recreation facilities. Therefore, the Hollywood South study area has a ratio of 0.3 park acres per 1,000 residents. This is below the Citywide Community Needs Assessment's recommended service level of 10.60 acres of park land per 1,000 persons.

¹¹ City of Los Angeles Department of Recreation and Parks, 2009 Citywide Community Needs Assessment, 2009.

Even if all 1,807 Project jobs are taken by employees that are new transplants to the surrounding area patronizing park and recreation facilities, an increase of 1,807 employees would represent 1.4 percent of the total service population for the park and recreation facilities serving the Hollywood South area. The increase in 1,807 new employees would not change the park service ratio of 0.3 park acres per 1,000 residents. Therefore, this increase in employees would not substantially impact park and recreation facilities.

Therefore, operation of the Project would not result in the need to construct new or physically alter existing parks and recreation facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for such facilities. Project operational impacts associated with parks and recreation facilities are considered less than significant.



SOURCE: City of Los Angeles Department of Parks and Recreation. 2020; Bing Maps

FIGURE IV.L.4-1

Parks and Recreation Facilities Serving the Project Area

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(2) Mitigation Measures

Impacts regarding park and recreation facilities were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Impacts regarding park and recreation facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

(1) Impact Analysis

(a) Construction

As discussed under Threshold (a), construction of the Project would generate part- and full-time construction jobs during the duration of the construction period. However, because the Project would be implemented in three phases between 2020 to 2028, and most/all of the construction workers would not be needed continuously and only for varying portions of the Project phases, it is reasonable to assume that construction workers would work on construction sites, including the Project Site, on a temporary basis only, and thus, are not likely to relocate their households and increase the use of existing parks and recreational facilities as a consequence of the construction job opportunities presented by the Project.

Construction of the Project would generate part-time and full-time construction jobs during the duration of the construction period. However, because the Project would be implemented in three phases between 2020 to 2028 and most/all of the construction workers would not be needed continuously and only for varying portions of the Project phases, it is reasonable to assume that construction workers would work on construction sites, including the Project Site, on a temporary basis only, and thus, are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. The use of public parks and recreational facilities by construction workers would 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 spend their lunch breaks at parks and recreational facilities near the site, such as Barnsdall Art Park, the resulting increase would be temporary and negligible.

As such, Project construction would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of these existing facilities would occur or be accelerated. **Therefore, impacts on parks and recreational facilities during Project construction would be less than significant.**

(b) *Operation*

As discussed under Threshold (a), the Project would not include a residential component, and therefore, would not directly generate population growth. However, the Project would generate increased employment opportunities, which could indirectly generate population growth.

The Project is located in the Hollywood South study area as identified in the PNA. According to this assessment, the Hollywood South area currently has a population of 104,938 residents and 28 acres of park and recreation facilities. Therefore, the Hollywood South study area has a ratio of 0.3 park acres per 1,000 residents.

Even if all 1,807 employees are new transplants to the surrounding area patronizing park and recreation facilities, the increase in 1,807 employees represents 1.4 percent of the total service population for the park and recreation facilities serving the Hollywood South area. The increase in 1,807 new employees would not change the park service ratio of 0.3 park acres per 1,000 residents. Therefore, this increase in residents is nominal and would not substantially impact park and recreation facilities.

Project operation 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. Therefore, impacts on parks and recreational facilities during Project operation would be less than significant.

(2) Mitigation Measures

Impacts regarding park and recreation facilities were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Impacts regarding park and recreation facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

Threshold (c): *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

(a) *Construction*

The construction of the Project would not include the construction or expansion of recreational facilities. As discussed under Threshold (a), construction of the Project would generate part- and full-time construction jobs during the duration of the construction period. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, it is anticipated that construction workers would work on construction sites, including the Project Site, on a temporary basis only, and thus, are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. **The Project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, impacts on parks and recreational facilities during Project construction would be less than significant.**

(b) *Operation*

The Project would not include or require the construction, operation, or expansion of recreational facilities. As discussed under Threshold (a), the Project would not include a residential component and therefore, would not directly generate population growth. However, the Project would generate increased employment opportunities, which could indirectly generate population growth.

The Project is located in the Hollywood South study area of the PNA. According to this assessment, the Hollywood South area currently has a population of 104,938 residents and 28 acres of park and recreation facilities. Therefore, the Hollywood South region has a ratio of 0.3 park acres per 1,000 residents.

Assuming all 1,807 employees are new transplants to the surrounding area patronizing park and recreation facilities, these employees would represent 1.4 percent of the total service population for the park and recreation facilities serving the Hollywood South study area. The addition of 1,807 new employees, even if they relocated to the immediate area, would not change the park service ratio of 0.3 park acres per 1,000 residents. **This increase in employees is nominal and would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, impacts on parks and recreational facilities caused by Project operation would be less than significant.**

(2) Mitigation Measures

Impacts regarding construction or expansion of recreation facilities were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Impacts regarding construction or expansion of recreation facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

(1) Impact Analysis

The Project is not expected to cumulatively contribute to related impacts in a manner that would cause significant impacts associated with parks and recreation facilities in conjunction with related residential projects identified in Chapter II, Environmental Setting. As discussed above, it is not anticipated that the construction or operation of the Project would result in a direct or indirect impact on City parks and recreational facilities. The Project's increase in 1,807 new employees would not change the current park service ratio of 0.3 park acres per 1,000 residents in the Hollywood South study area of the PNA.

Related projects as listed in **Table II-2** in Chapter II are largely residential or mixed-use residential and include the construction of approximately 10,468 dwelling units. These new residences could accommodate some employees associated with the Project. However, impacts on neighborhood and community parks from the increase in population generated by cumulative development would be mitigated on a case-by-case basis. Applicants proposing new residential development would be required to dedicate park land or pay development impact fees for parks per City Ordinance No. 184505, the Quimby Act, and/or the City's Dwelling Unit Construction Tax, as appropriate and applicable to that related project.¹² Furthermore, each related project would also be required to provide open space per Los Angeles Municipal Code Section 12.21 G and may include additional recreational amenities which would help reduce the demand on parks and recreational facilities in the area surrounding the Project Site. Therefore, payment of these development fees, dedication of park land, or other mitigation would offset any potential cumulative impacts that could occur to parks and recreational facilities from development of the cumulative projects. **The Project combined with the cumulative projects listed in Table II-2 would not result in a significant impact to park and recreation facilities. Therefore, the Project's cumulative impacts associated with parks and recreation facilities would be less than significant.**

¹² City of Los Angeles Department of Recreation and Parks, Park Fees, 2021.

(2) Mitigation Measures

Cumulative impacts related to parks and recreational facilities would be less than significant. Therefore, no mitigation is required.

(3) Level of Significance after Mitigation

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

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