

IV. Environmental Impact Analysis

K.4. Public Services – Parks and Recreation

1. Introduction

This section analyzes the potential impacts of the Project on public parks and recreational facilities. The demand for existing parks and recreational facilities by Project residents is evaluated in light of the open space and recreational facilities to be provided as part of the Project. This section also analyzes the Project's consistency with applicable City of Los Angeles (City) recommendations and regulatory requirements regarding the need for such facilities. Information and analysis in this section are based, in part, on existing service ratios, existing parks and recreational facilities, and other information provided by the City of Los Angeles Department of Recreation and Parks (RAP) and provided in Appendix L-4 of this Draft EIR.¹

2. Environmental Setting

a) Regulatory Framework

(1) State

(a) Quimby Act

California Government Code Section 66477, also known as the Quimby Act, was enacted by the California legislature in 1965 to promote the availability of park and open space areas in response to California's rapid urbanization and the need to preserve open space and provide parks and recreational facilities in response to this urbanization. The Quimby Act authorizes cities and counties to enact ordinances requiring the dedication of land, or the payment of fees for park and/or recreational facilities in lieu thereof, or both, by developers of residential subdivisions as a condition to the approval of a tentative map or parcel map. Under the Quimby Act, dedications of land shall not exceed three acres of parkland per 1,000 persons residing within a subdivision, and in-lieu fee payments shall not exceed the proportionate amount necessary to provide three acres of parkland, unless the amount of existing neighborhood and community parkland exceeds that limit. Los Angeles Municipal Code (LAMC) Section 12.33 was adopted to implement the Quimby Act and provide a

¹ Darryl Ford, Senior Management Analyst I, Planning, Maintenance, and Construction Branch, City of Los Angeles Department of Recreation and Parks (RAP), letter correspondence dated December 27, 2017. Provided in Appendix L-4 of this Draft EIR.

mechanism for increasing park and recreational facilities available for the City's residents. LAMC Section 12.33 is discussed further below.

(2) Local

(a) *City of Los Angeles Charter*

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

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

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

The City's General Plan Framework Element (adopted in December 1996 and readopted in August 2001) includes park and open space policies that address recreational uses throughout the City. Policy 9.23.5 directs the RAP to "[r]e-evaluate the current park standards and develop modified standards which recognize urban parks, including multi-level facilities, smaller sites, more intense use of land, public/private partnerships and so on." In addition, Policy 9.23.8 instructs the RAP to "[p]repare an update of the General Plan Public Facilities and Services Element based on the new Los Angeles Department of Recreation and Parks standards by 2005."

(c) *City of Los Angeles Open Space Element*

The City's Open Space Element was prepared in June 1973 to provide an official guide to the City Planning Commission, the City Council, the Mayor, and other governmental agencies and interested citizens for the identification, preservation, conservation, and acquisition of open space in the City.² 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;

² City of Los Angeles Department of City Planning, *Open Space Plan*, June 1973, page 1.

density and development; cultural or historical sites; safety, health, and social welfare; environmental and ecological balance; and unique sites.³

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.^{4,5} Until approval of the pending updates to the Open Space Element, the RAP is operating under the guidance of the Public Recreation Plan (PRP) discussed below.

(d) *City of Los Angeles Public Recreation Plan*

Within the City's General Plan, the PRP, a portion of the Service Systems Element, establishes guidelines related to parks, recreational facilities, and open space areas in the City. Adopted in 1980 by the Los Angeles City Council⁶ and amended by City Council resolution 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,⁷ the PRP addresses the need for publicly accessible neighborhood, community, and regional recreational sites and facilities across the City. The PRP focuses on recreational site and facility planning in underserved neighborhoods with the fewest existing resources and the greatest number of potential users (i.e., where existing residential development generates the greatest demand), as well as areas where new subdivisions, intensification of existing residential development, or redevelopment of "blighted" residential areas creates new demand.

The amended PRP establishes general guidelines for neighborhood, community, and regional recreational sites and facilities that address general service radius and access as well as service levels relative to population within that radius. The PRP also states that the allocation of acreage for community and neighborhood parks should be based on the resident population within that general service radius. Toward this end, the amended PRP recommends the goals of 2.0 acres each of neighborhood and community recreational sites and facilities per 1,000 residents, and 6.0 acres of regional recreational sites and facilities per 1,000 residents. To determine existing service ratios, the RAP commonly uses the geographic area covered by the applicable

³ City of Los Angeles Department of City Planning, *Open Space Plan*, June 1973.

⁴ City of Los Angeles Office of the City Clerk, Council File Number 96-1358, <https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=96-1358>. Accessed January 28, 2021.

⁵ City of Los Angeles Department of City Planning, *General Plan Structure: Summary of the General Plan Elements*, Spring 2014.

⁶ City of Los Angeles, *Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan*, approved October 9, 1980.

⁷ City of Los Angeles Planning Commission, *Resolution amending the Public Recreation Plan of the Service Systems Element of the City of Los Angeles General Plan*, March 24, 2016.

Community Plan rather than the park service radius.⁸ 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.⁹

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.¹⁰

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.¹¹

(e) *City of Los Angeles Health and Wellness Element (Plan for a Healthy Los Angeles)*

In March 2015, the City adopted the Plan for a Healthy Los Angeles as the Health and Wellness Element of the General Plan.¹² This plan elevates existing health-oriented policies in the General Plan and, where policy gaps exist, creates new policies to reinforce the City's goal of creating healthy, vibrant communities. With a focus on public health and safety, the plan serves as a guide for addressing quality-of-life issues, such as safe neighborhoods, a clean environment, access to health services, affordable housing, healthy and sustainably produced food, and the opportunity to thrive. This plan identifies new policies and potential programs to create healthier neighborhoods by working toward seven goals: (1) Los Angeles, a Leader in Health and Equity; (2) A City Built for Health; (3) Bountiful Parks and Open Spaces; (4) Food that Nourishes the Body, Soul, and

⁸ City of Los Angeles, *Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan*, approved October 9, 1980.

⁹ City of Los Angeles Planning Commission, *Resolution amending the Public Recreation Plan of the Service Systems Element of the City of Los Angeles General Plan*, March 24, 2016, page 5.

¹⁰ City of Los Angeles Planning Commission, *Resolution amending the Public Recreation Plan of the Service Systems Element of the City of Los Angeles General Plan*, March 24, 2016, pages 5-6.

¹¹ City of Los Angeles Planning Commission, *Resolution amending the Public Recreation Plan of the Service Systems Element of the City of Los Angeles General Plan*, March 24, 2016, page 6.

¹² City of Los Angeles Department of City Planning, *Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan*, March 2015.

Environment; (5) An Environment Where Life Thrives; (6) Lifelong Opportunities for Learning and Prosperity; and (7) Safe and Just Neighborhoods.

As such, this plan highlights the importance of parks and open spaces through the following objectives:

- Increase the number of neighborhood and community parks so that every Community Plan Area strives for three 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.

Although this plan includes an objective to reach a standard of three acres of neighborhood and community park space per 1,000 residents (excluding regional parks and open space),¹³ the RAP is operating under the guidance and standards of the PRP, as previously described.

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

In 2009, the RAP completed a Citywide Community Needs Assessment (Assessment) as a preliminary step in developing a Citywide park master plan and five-year capital improvement plan. The report was envisioned as the basis for a Citywide Parks and Recreation Master/Strategic Plan and capital improvement plan, as well as the basis for longer-term planning initiatives related to parks and recreational facilities.¹⁴

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.

As stated in the Assessment, 63 percent of respondents would travel at least one mile to visit a neighborhood park, whereas 38 percent were willing to travel at least two miles. 71 percent of respondents would travel at least two miles to visit a community

¹³ City of Los Angeles Department of City Planning, *Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan*, March 2015, page 53.

¹⁴ RAP, *2009 Citywide Community Needs Assessment*, Section 1.1.2, Purposes and Process, approved October 9, 2009, page 3.

park, whereas 37 percent would travel more than three miles to visit a community park.¹⁵

The objectives of the Assessment were to (1) preliminarily prioritize and address the tremendous needs for additional recreation and park land; (2) identify existing facilities needing improvements to meet current and future community needs; (3) identify recreation program needs, perform demographic analysis, and prevent future maintenance problems; and (4) offer positive alternatives to an increasingly dense and urbanized population.¹⁶

The Assessment recommends Citywide service levels for the future provision of park acreage, totaling 9.60 acres of parkland per 1,000 persons Citywide:

- Mini-Parks: 0.10 acre per 1,000 residents
- Neighborhood Parks: 1.50 acres per 1,000 residents
- Community Parks: 2 acres per 1,000 residents
- Regional and Large Urban Parks: 6.0 acres per 1,000 residents

(g) Central City North Community Plan

The Project Site is located within the boundaries of the Central City North Community Plan (Community Plan), one of 35 Community Plans that comprise the General Plan Land Use Element. Community Plans include, among other provisions, guidelines regarding the appearance of development and the arrangement of land use. The Central City North Community Plan contains the following parks, recreation and open space objectives, policies, urban design standards, and guidelines applicable to the Project:¹⁷

Chapter III, Land Use Policies and Programs, Recreation and Parks Facilities:

Objective 4-1: To conserve, maintain and better utilize existing recreation and park facilities which promote the recreational needs of the community.

Policy 4-1.1: Preserve the existing recreational facilities and park space.

Chapter III, Land Use Policies and Programs, Open Space:

Objective 5-1: To preserve existing open space resources and where possible develop new open space.

Policy 5-1.1: Encourage the retention of passive and visual open space which provides a balance to the urban development of the Plan Area.

¹⁵ RAP, *2009 Citywide Community Needs Assessment*, Section 1.1.2, Purposes and Process, approved October 9, 2009, page 25.

¹⁶ RAP, *2009 Citywide Community Needs Assessment*, Section 1.1.2, Purposes and Process, approved October 9, 2009, page 3.

¹⁷ City of Los Angeles Department of City Planning, *Central City North Community Plan*, December 15, 2000.

Chapter V, Urban Design:

Guideline C.1 (Multiple Residential – Site Planning): Require useable open space for outdoor activities, especially for children.

Guideline H.1 (Public Open Space and Plazas): Establish public open space standards that will guide the design of new public plazas and open spaces, including the consideration of the siting of open space (to maximize pedestrian accessibility and circulation, solar expose or protection), adjacency to pedestrian routes and other open spaces, and appropriate plant and hardscape materials.

(h) *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 2022.¹⁸ 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 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 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.

(i) *River Improvement Overlay (RIO) District Ordinance*

The River Improvement Overlay (RIO) District is a special use district established in 2014 by Ordinance Nos. 183,144 and 183,145 to support implementation of the Los Angeles River Revitalization Plan, a long-term blueprint for a variety of comprehensive improvements intended to make the Los Angeles River a landmark and a catalyst for sustainability. The RIO District generally encompasses a linear corridor extending one-half mile on either side of the Los Angeles River within City boundaries, creating an area 1 mile wide and approximately 32 miles long that encompasses all of the neighborhoods, including public and private land, adjacent to the river. The Project Site is located approximately 200 feet west of the Los Angeles River (as measured from the top of the channel) and is therefore within the RIO District’s “outer core”,¹⁹ indicating that it does not front directly on the river.

¹⁸ RAP, *Park Proud LA Strategic Plan 2018–2022*.

¹⁹ City of Los Angeles, Ordinance No. 183,145, effective August 20, 2014, page 5.

The ordinance is intended to achieve the following within the RIO District:

- Contribute to the environmental and ecological health of the City's watersheds; Establish a positive interface between river adjacent property and river parks and/or greenways;
- Promote pedestrian, bicycle and other multi-modal connection between the river and its surrounding neighborhoods;
- Provide native habitat and support local species; provide an aesthetically pleasing environment for pedestrians and bicyclists accessing the river area; provide safe, convenient access to and circulation along the river;
- Promote the river identity of river adjacent [sic] communities; and
- Support the Low Impact Development Ordinance, the City's Irrigation Guidelines, and the Standard Urban Stormwater Maintenance Program.

Development regulations applicable in the RIO District are set forth in LAMC Section 13.17 and address landscaping, design criteria such as lighting, fencing, and gates, and certain administrative review procedures for projects within the RIO District.²⁰ Of relevance for parks and recreation, the ordinance also establishes regulations concerning the provision of river access along the river.

(j) City of Los Angeles Municipal Code

In September 2016, the City adopted Ordinance No. 184,505, Parks Dedication and Fee Update Ordinance (Park Fee Ordinance).²¹ The Park Fee Ordinance aimed to increase the opportunities for park space creation and expand the fee program beyond those projects requiring a subdivision map to include a park linkage fee for all net new residential units. The Park Fee Ordinance amended LAMC Sections 12.21,²² 12.33,²³ 17.03,²⁴ 17.12,²⁵ and 17.58,²⁶ deleted LAMC Sections 17.07 and 19.01, and added LAMC Section 19.17.²⁷ The Park Fee Ordinance increased Quimby in-lieu fees, provided a new impact fee for non-subdivision projects, eliminated the deferral of park fees for market rate projects that include residential units, increased the fee spending radii from the site from which the fee is collected, provided for early City consultation for subdivision projects or projects with over 50 units in

²⁰ Zoning Information (ZI) No. 2358, River Improvement Overlay District, Ordinance Nos. 183,144 and 183,145, revised January 12, 2015.

²¹ City of Los Angeles Department of City Planning, Ordinance No. 184,505, approved by City Council on September 7, 2016, signed by the Mayor on September 13, 2016 and published on September 19, 2016.

²² City of Los Angeles, Municipal Code Section 12.21, General Provisions.

²³ City of Los Angeles, Municipal Code Section 12.33, Park Fees and Land Dedication, amended by Ordinance No. 184,505, effective January 11, 2017.

²⁴ City of Los Angeles, Municipal Code Section 17.03, Advisory Agency, amended by Ordinance No. 150,947, effective July 3, 1978.

²⁵ City of Los Angeles, Municipal Code Section 17.12, Parks and Recreation Site Acquisition and Development Provisions, amended by Ordinance No. 184,505, effective January 11, 2017.

²⁶ City of Los Angeles, Municipal Code Section 17.58, Park and Recreation Site Acquisition and Development, amended by Ordinance No. 184,505, effective January 11, 2017.

²⁷ City of Los Angeles, Municipal Code LAMC Section 19.17, Park Fee, added by Ordinance No. 184,505, effective January 11, 2017.

order to identify means to dedicate land for park space, and updated the provisions for credits against park fees. The Park Fee Ordinance went into effect on January 11, 2017. The LAMC provisions, as amended by the Park Fee Ordinance, are summarized below.

Section 12.21.G²⁸, Usable Open Space Requirement for Six or More Residential Units, 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 which 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 to offset the park- and open space-related impacts of new residential development projects.²⁹ 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.³⁰ The formula is dependent on the number of new market-rate dwelling units for the development, the average number of people per occupied welling unit, and the park service factor that would be provided by the RAP rate and fee schedule. Land dedication and in-lieu fee payment are subject to the restrictions set forth in LAMC 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).

²⁸ City of Los Angeles, Municipal Code Section 12.21 G, Open Space Requirements for Six or More Residential Units, added by Ordinance No. 171,753, effective November 17, 1997.

²⁹ City of Los Angeles, Ordinance No. 184,505, effective January 11, 2017.

³⁰ City of Los Angeles, Municipal Code Section 12.33 D, Residential Subdivision Projects That Contain More Than 50 Dwelling Units, amended by Ordinance No. 184,505, effective January 11, 2017.

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.³¹ 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 the 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.³² 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.³³

LAMC Section 21.10.3, Dwelling Unit Construction Tax, establishes the payment of a dwelling unit construction tax of \$200 per new residential unit.³⁴ 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.

b) Existing Conditions

(1) RAP Facilities and Ratios

The RAP is responsible for the establishment, operation, and maintenance of parks and recreational facilities in the City. These facilities include parks, swimming pools, public

³¹ City of Los Angeles, Municipal Code Section 12.33 G, Affordable Housing Exemption, amended by Ordinance No. 184,505, effective January 11, 2017.

³² City of Los Angeles, Municipal Code Section 12.33 H, Credits, amended by Ordinance No. 184,505, effective January 11, 2017.

³³ City of Los Angeles, Municipal Code Section 12.33 H.2, Privately Owned Park and Recreational Facilities, amended by Ordinance No. 184,505, effective January 11, 2017.

³⁴ City of Los Angeles, Municipal Code Section 21.10.3, Dwelling Unit Construction Tax.

golf courses, recreation centers, museums, youth camps, tennis courts, sports programs, and programs for senior citizens. The RAP also supervises construction of new facilities and improvements to existing ones. Currently, the RAP maintains over 16,000 acres of parkland within approximately 444 regional, community and neighborhood parks, 422 playgrounds, 321 tennis courts, 184 recreational centers, 72 fitness areas, 62 swimming pools and aquatic centers, 30 senior centers, 26 skate parks, 13 golf courses, 12 museums, nine dog parks, 187 summer youth camps, and helps support the Summer Night Lights gang reduction and community intervention program. The RAP supports the City's urban wilderness and open spaces by maintaining and caring for the park urban tree canopy, 13 lakes, and 92 miles of hiking trails. The RAP oversees Griffith Park and operates Venice Beach, Cabrillo Marine Aquarium, and 12 museums.³⁵

The adequacy of parkland is measured in the General Plan (i.e., the PRP) in terms of acres of recreational sites and facilities per 1,000 City residents within a given service area.³⁶ The City has an estimated existing Citywide ratio of 0.76 acres of neighborhood and community parkland per 1,000 residents, while the Central City North Community Plan area portion of the City has a ratio of 0.84 acres of neighborhood and community parkland per 1,000 residents.³⁷ The existing ratio of neighborhood and community park acreage ratios within the Community Plan area does not meet the City's standards under the PRP for 4.0 acres per 1,000 residents. While data regarding the level of use for the recreational sites and facilities that serve the Project Site is not available, such resources within the surrounding community are heavily utilized and often overburdened.³⁸

(2) Existing Parks in the Project Area

The Project Site is currently developed, and no existing parks or recreational facilities are located on-site. The RAP has identified the following parks in the Project vicinity: six neighborhood parks located within a two-mile radius; 62 community parks located within a five-mile radius; and 23 regional parks located within a 10-mile radius. For a comprehensive list, see Appendix L-4, Public Service Correspondence – Los Angeles Department of Recreation and Parks, of this Draft EIR.³⁹ The nearest RAP park, the Arts District Park at 501 S. Hewitt Street, is the only existing park located in the Arts District and is located approximately 0.40 miles northwest of the Project Site. This approximate 0.50-acre neighborhood park includes a children's playground, a mural

³⁵ RAP, Who We Are, <http://www.laparks.org/department/who-we-are>. Accessed January 28, 2021.

³⁶ City of Los Angeles, *Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan*, approved October 9, 1980.

³⁷ Darryl Ford, Senior Management Analyst I, Planning, Maintenance, and Construction Branch, RAP, letter correspondence dated December 27, 2017. Provided in Appendix L-4 of this Draft EIR.

³⁸ Darryl Ford, Senior Management Analyst I, Planning, Maintenance, and Construction Branch, RAP, letter correspondence dated December 27, 2017. Provided in Appendix L-4 of this Draft EIR.

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wall, and a bandshell-style shade structure that covers a performance area.⁴⁰ The next closest RAP park, Gladys Park at 624 East 6th Street, is located approximately 0.40 miles northwest of the Project Site and is within the Downtown District as well as the Central City Community Plan Area. This approximate 0.30-acre neighborhood park includes basketball courts (unlighted/outdoor), outdoor exercise equipment (without weights), and picnic tables.⁴¹ Existing parks and recreational facilities located within two miles of the Project Site are listed in **Table IV.K.4-1, RAP Parks and Recreational Facilities Located in the Vicinity of the Project Site**, and illustrated in **Figure IV.K.4-1, Parks and Recreational Facilities Located in the Vicinity of the Project Site**.

**TABLE IV.K.4-1
RAP PARKS AND RECREATIONAL FACILITIES LOCATED IN THE VICINITY OF THE PROJECT SITE**

No.	Facility and Address	Distance from Project Site (miles) ^a	Park Type
1	Alpine Recreation Center 817 Yale Street	1.88 miles	Community Park
2	Central Recreation Center 1357 E. 22nd Street	1.50 miles	Community Park
3	Hostetter Park 3141 E. Olympic Boulevard	1.40 miles	Community Park
4	Evergreen Recreation Center 2839 E. 4th Street	1.31 miles	Community Park
5	Hollenbeck Park 415 S. St. Louis Street	0.56 miles	Community Park
6	Pecan Recreation Center 127 S. Pecan Street	0.62 miles	Community Park
7	Pershing Square 525 S. Olive Street	1.51 miles	Community Park
8	Roosevelt High School Pool 456 S. Mathews Street	0.96 miles	Community Park
9	Ross Snyder Recreation Center 1501 E. 41 Street	1.96 miles	Community Park
10	State Street Recreation Center 716 N. State Street	1.37 miles	Community Park
11	Aliso-Pico Recreation Center 370 S. Clarence Street	0.47 miles	Community Park
12	Msgr. Ramon D. Garcia Recreation Center 1016 S. Fresno Street	1.34 miles	Community Park

⁴⁰ Los Angeles Downtown News, Long-Awaited Arts District Park Opens Tomorrow, November 4, 2016, http://www.ladowntownnews.com/news/long-awaited-arts-district-park-opens-tomorrow/article_84bbc156-a222-11e6-b5e3-631b5b7d68c2.html. Accessed January 28, 2021.

⁴¹ RAP, Gladys Park, <https://www.laparks.org/park/6th-gladys-street>. Accessed January 28, 2021.

TABLE IV.K.4-1
RAP PARKS AND RECREATIONAL FACILITIES LOCATED IN THE VICINITY OF THE PROJECT SITE

No.	Facility and Address	Distance from Project Site (miles) ^a	Park Type
13	Boyle Heights Sports Center 933 S. Mott Street	0.78 miles	Community Park
14	Wabash Recreation Center 2765 Wabash Ave	1.99 miles	Community Park
15	6th & Gladys Street Park 624 E. 6th Street	0.77 miles	Neighborhood Park
16	Prospect Park 612 N. Echandia Street	1.20 miles	Neighborhood Park
17	Spring Street Park 428 S. Spring Street	1.30 miles	Neighborhood Park
18	Grand Hope Park 900 S. Hope Street	1.83 miles	Neighborhood Park
19	Arts District Park 501 S. Hewitt Street	0.41 miles	Neighborhood Park
20	San Julian Park 312 E. 5th Street	1.02 miles	Neighborhood Park
21	PARC Adjacent to Ribbon of Light	Adjacent to the Project Site	Proposed Park
22	1st and Broadway Civic Center Park 205 S. Broadway	1.36 miles	Proposed Park

NOTE(S):

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

SOURCE: Darryl Ford, Senior Management Analyst I, Planning, Maintenance, and Construction Branch, RAP, letter correspondence dated December 27, 2017.

(3) Ribbon of Light Bridge and Sixth Street Park, Arts, River, and Connectivity Improvements (PARC)

The Ribbon of Light Bridge, proposed as part of the Sixth Street Viaduct Replacement Project, is currently under construction north of the Project Site. In conjunction with the Ribbon of Light Bridge, the City has proposed the approximately 12-acre Sixth Street Park, Arts, River, and Connectivity Improvements project (PARC Improvements) immediately north of and adjacent to the proposed Project Site.⁴² The Ribbon of Light Bridge and PARC Improvements are discussed in more detail below.

⁴² City of Los Angeles Bureau of Engineering, Sixth Street Park, Arts, River & Connectivity Improvements (PARC) Project, http://eng.lacity.org/sixthstreet_parks_arts. Accessed January 28, 2021.



SOURCE: ESRI 2018; City of Los Angeles Department of Recreation and Parks, 2017; City of Los Angeles Bureau of Engineering, 2018: <http://www.sixthstreetviaduct.org/parcmaps>

670 Mesquit

Figure IV.K.4-1
Parks and Recreational Facilities
Located in the Vicinity of the Project Site

(a) *Ribbon of Light Bridge*

The Ribbon of Light Bridge, currently under construction north of the Project Site, is an approximately 3,500-foot-long bridge connecting the Arts District and Boyle Heights. It replaces the circa 1932 Sixth Street Viaduct, which was demolished in 2016.⁴³ The largest bridge project in the City’s history, the Ribbon of Light Bridge begins northeast of the Project Site, and the elevated bridge deck will span the railroad rights-of-way (ROWs), the Los Angeles River, and several streets east of the river (Mission Road, Anderson Street, and Clarence Street). The bridge will incorporate ten distinctive pairs of arches, bicycle lanes, wide pedestrian walkways, and stairs and bicycle ramps that provide access to the proposed PARC Improvements at grade. In this way, the bridge will accommodate multimodal connectivity along its entire length, linking the bridge, PARC Improvements, Los Angeles River, and potential future riverfront improvements contemplated as part of the Los Angeles River Revitalization Plan. Construction of the Ribbon of Light Bridge is expected to conclude in 2022.⁴⁴

(b) *PARC Improvements*

The City’s proposed PARC Improvements, envisioned in conjunction with and as the second phase of the Ribbon of Light Bridge project, would create a series of public open spaces underneath and adjacent to the Ribbon of Light Bridge, following the bridge’s 6th Street approach and alignment from Mateo Street on the west to the Hollywood Freeway (US-101) on the east.⁴⁵ The various components of the PARC Improvements are intended to serve the open space and recreational needs of the surrounding communities, connect and improve neighborhoods, incorporate sustainable design consistent with the City’s plans and goals, encourage active modes of transportation and public transit, promote beneficial stormwater capture, and provide safe pedestrian and bicycle access to the River.

The City’s proposed PARC Improvements are currently undergoing conceptual design development and environmental review, but preliminary plans indicate three distinct components proposed in the Project vicinity: Arts District West Park, Arts Plaza and River Gateway, and Boyle Heights East Park. These are described below. According to the scoping meeting materials prepared by the City, the PARC Improvements are anticipated to be constructed in phases over a period of approximately 18 months between 2020 and 2022, which may allow for public access before full Project buildout.⁴⁶

(i) *Arts District West Park*

The proposed Arts District West Park, located west of the Project Site on 6th Street between Mateo Street and Santa Fe Avenue, would include landscaped pedestrian

⁴³ City of Los Angeles Bureau of Engineering, Sixth Street Viaduct Replacement Project, About The Project, https://www.sixthstreetviaduct.org/about_the_project. Accessed January 28, 2021.

⁴⁴ City of Los Angeles Bureau of Engineering, Sixth Street Viaduct Replacement Project, September 2020 News Letter, http://www.sixthstreetviaduct.org/september_2020. Accessed January 12, 2021.

⁴⁵ City of Los Angeles Bureau of Engineering, *Sixth Street PARC Project Initial Study*, April 2017, page 2-1.

⁴⁶ City of Los Angeles, Bureau of Engineering, Sixth Street PARC Project, Scoping Meeting Presentation.

corridors, a meadow and areas with trees, an arts plaza and stage, as well as a native garden. Additionally, landscaped terraces would descend from street level to the Los Angeles River basin directly below. The Arts District West Park currently has three options: (1) Sports Focused, which would contain a synthetic turf soccer field, rain garden, flexible play and performance lawn, flex courts, adult fitness circuits, etc.; (2) Nature Focused, which would contain more open meadows and nature-play spaces; and (3) Balanced, which would be a mix of the Sports and Nature Focused concepts.⁴⁷

(ii) *Arts Plaza and River Gateway*

The proposed Arts Plaza would be located between the Arts District West Park and the Railway Property east of the Project Site. It is proposed to include gardens, lawn, and trees, terraces, and a performance stage.⁴⁸ The Arts Plaza would lead to the adjacent existing pedestrian/vehicular tunnel river bikeway, or River Gateway, which may be modified as part of the Sixth Street Viaduct Replacement Project.⁴⁹

(iii) *Boyle Heights East Park*

The Boyle Heights East Park is proposed on the east bank of the Los Angeles River within the Boyle Heights community. The park would include landscaped pedestrian corridors, meadows or lawns, native gardens, trees, a bioswale, and a synthetic turf soccer field. Terracing of the sloping surface and a bikeway could increase connectivity to the surrounding community.⁵⁰

(4) **Metro Los Angeles River Bike Path Gap Closure Project**

Metro has proposed the creation of an eight-mile-long bicycle path along the west bank and, potentially, within the river channel, of the Los Angeles River between Elysian Park and Downtown Los Angeles.⁵¹ Together with other public agencies and jurisdictions, Metro has identified the path segment between Elysian Valley and the City of Vernon, which would pass by the Project Site, as a high-priority pedestrian and bicycle infrastructure project. Funded by Measure M, the Los Angeles River Bike Path Gap Closure Project is intended to connect the existing bicycle paths that already exist north and south of this proposed segment: the terminus of the Los Angeles River Greenway Trail at Riverside Drive in Elysian Valley on the north and the beginning of the Los Angeles River Bike Path at Atlantic Boulevard in Vernon on the south.

The Los Angeles River Bike Path Gap Closure Project is also intended to link existing pedestrian and bicycle infrastructure within the communities the river corridor passes

⁴⁷ City of Los Angeles Bureau of Engineering, Sixth Street PARC Community Meeting Presentation – Sept 19 & 20, 2017, pages 23 to 25.

⁴⁸ City of Los Angeles Bureau of Engineering, Sixth Street PARC Community Meeting Presentation, page 57.

⁴⁹ City of Los Angeles Bureau of Engineering, *Sixth Street PARC Project Initial Study*, page 2-21.

⁵⁰ City of Los Angeles Bureau of Engineering, Sixth Street PARC Community Meeting Presentation, page 50.

⁵¹ Metro, Los Angeles River Bike Path Gap Closure Project, Fact Sheet, 2017.

through. Although the neighborhoods lining the river are predominantly industrial, Metro estimates a population of approximately 200,000 lives within three miles of the project area.⁵² The project would build out the longest remaining contiguous gap in a 32-mile-long, grade-separated pedestrian and bicycle corridor ultimately envisioned to extend from the San Fernando Valley to Long Beach, along much of the Los Angeles River's length. The Notice of Preparation of the Draft EIR for the Los Angeles River Bike Path Project was released on October 23, 2019.⁵³ As of 2020, Metro is currently conducting environmental review of the proposed Los Angeles River Bike Path Gap Closure Project, with construction of the final alignment design tentatively anticipated for 2025 through 2028.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to parks and recreation if it would:

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

Threshold (b): Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; 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 listed above are relied upon. The analysis utilizes the factors and considerations identified in the City's 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions. The factors to evaluate parks and recreation impacts include:

- The net population increase resulting from the proposed project.
- The demand for recreation and park services anticipated at the time of project build-out compared to the expected level of service available. Consider, as

⁵² Metro, *Los Angeles River Bike Path Gap Closure Feasibility Study*, May 31, 2016, updated July 12, 2017.

⁵³ Metro, *Notice of Preparation of a Draft Environmental Impact Report for the LA River Path Project*, October 23, 2019.

applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand.

- 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 analysis of parks and recreation is based on an estimate of the Project's residential population (based on the number of units), and the potential for increased demand to result in the need for construction of new facilities with associated impacts on the physical environment, or to result in the deterioration of existing facilities. The Project's commercial uses are not considered to generate appreciable additional demand for park and recreational facilities because the commercial uses would not generate permanent residential populations that would utilize the parks and recreational facilities in the area. Therefore, the commercial uses are not considered in the analysis. In addition, the metrics and Citywide goals used by RAP are based on residential population. The analysis considers the Project's proposed recreation and open space features and whether the provision of those facilities could reduce Project-generated demand on existing RAP-identified parks and recreational facilities. It should be noted that the analysis contained in Subsection 3.d, *Analysis of Project Impacts*, is based on the Project's potential demand on existing facilities and not on future facilities that are proposed and planned. Therefore, the analysis does not account for credits or deductions based on the proposed PARC Improvements located north of the Project Site. However, if approved and constructed, the PARC Improvements would further reduce demand for park facilities in the Project vicinity, which is noted in the analysis.

As stated in LAMC Section 12.21 G, open space includes areas defined for active and passive recreation and may consist of private and common areas. Publicly accessible open space includes ground floor areas that could be accessed by the general public, as well as residents within the Project Site. Common open space areas must be readily accessible to all residents of the site (and are generally not accessible by the general public). Common open space areas can incorporate recreational amenities such as gyms, pool decks and swimming pools, walking paths, picnic tables, benches, children's play areas, barbecue areas, and sitting areas. Private open space is defined as an area which 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.

The estimated Project-generated population, as well as the Project-provided recreational facilities, are converted to a service ratio expressed as acres of parkland per 1,000 residents. The ratio is compared to existing service ratios within the Community Plan area and the City as a whole, as well as service standards set forth by the City's Quimby Act provisions, the PRP, and the requirements set forth in LAMC.

The analysis also addresses potential impacts on park facilities that might occur due to construction activities.

c) Project Design Features

No specific Project Design Features are proposed with regard to parks and recreation beyond the open space and recreational amenities described in Chapter II, *Project Description*, of this Draft EIR, and the additional details provided in the following impact analysis portion of this section.

d) Analysis of Project Impacts

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

(1) Impact Analysis

(a) Public Recreation Plan

As previously discussed, the PRP recommends 2.0 acres each of neighborhood and community recreational sites and facilities per 1,000 persons, and 6.0 acres of regional recreational sites and facilities per 1,000 residents. As discussed in Section IV.J, *Population and Housing*, of this Draft EIR, the Project's 308 residential housing units would result in 743 residents on the Project Site.⁵⁴ Based on this residential population, the Project would be required to provide approximately 1.50 acres each of neighborhood recreational sites, as well as community recreational sites, for a total of three acres, to meet the PRP's recommendations of 2.0 acres per 1,000 persons.⁵⁵

The Project would provide approximately 141,876 square feet or 3.26 acres of open space, which would include the Northern Landscaped Area, Mesquit Paseo, River Balconies, Elevated Pedestrian Walkway connecting the River Balconies, Public Plaza Flex Deck, Fitness Deck, Sculpture Garden, Work Breakout Deck, and the Residential Pool Deck. This would exceed the total combined three acres of neighborhood and community recreational sites, to meet the recommended 2.0 acres each of neighborhood recreation sites per 1,000 persons, 2.0 acres of community recreational sites per 1,000 persons in the amended PRP, based on the Project's projected residential population. However, as previously discussed, the PRP parkland guidelines are Citywide goals and do not constitute requirements for individual development projects.

As noted above, given the Project's open space and recreational amenities, including a gym, a pool and pool deck, a variety of green spaces, an outdoor communal deck area

⁵⁴ The average household size in the City of Los Angeles is based on 2018 Census American Community Survey 5-Year Estimate data (2014–2018).

⁵⁵ $743 \text{ residents} / 1,000 \text{ persons} = 0.743 \times 1 \text{ acres} = 0.075 \text{ acres} \times 2 = 1.50 \text{ acres}$

(Public Plaza Flex Deck), and other common open space areas, it is expected that the Project-related recreational demand would be at least partially accommodated on the proposed Project Site. Likewise, it can be reasonably assumed that residual off-site park usage would likely be dispersed among the six neighborhood parks and 14 community parks that are within a two-mile radius of the Project Site, as shown in Table IV.K-4-1 above, that RAP has indicated would serve the Project.

Other incidental, albeit privately owned, open space in the Project vicinity includes the Arts District Dog Park at 1004 E. 4th Street, approximately 0.60 miles northwest of the Project Site, and the 7th and Bridge Picnic Area, just south of the 7th Street Bridge and adjacent to the 2121 Lofts residential development. While these private open spaces are not under the jurisdiction of RAP, they are open to the public and thus have the potential to reduce Project-related recreational demand on RAP facilities.

Moreover, north of the Project Site, the City's proposed PARC Improvements, which are not part of the Project, are intended for implementation in conjunction with the Ribbon of Light Bridge. One component of the PARC Improvements, the Arts Plaza and River Gateway, would abut the Project's Northern Landscaped Area. The City and Applicant have agreed to an Option for a Park Easement that would serve as an extension of the City's proposed PARC Improvements, effectively increasing shared use of both the Arts Plaza and River Gateway and the Project's Northern Landscaped Area. In all, the City's proposed PARC Improvements if approved and constructed would provide approximately 12 acres of landscaped open space and recreational amenities.

The City's under-construction Ribbon of Light Bridge also includes several pedestrian and recreational amenities, including wider sidewalks for pedestrians, dedicated bicycle lanes, and dedicated pedestrian and bicycle ramps on both sides of the bridge that lead to the river corridor and, if constructed, the PARC Improvements.

Notwithstanding the on-site open space and recreational amenities proposed, and the private and planned public amenities in the Project vicinity, some Project residents would still be expected to utilize nearby public park amenities such as picnic areas, sports fields, and basketball courts. As a result, the Project could result in a small incremental increase in the use of area neighborhood, community, and regional public parks.

However, as discussed further below, compliance with regulatory requirements would ensure that the intent of the PRP's parkland guidelines would be addressed through compliance with state law (e.g., Quimby Act) as enforced through applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces (e.g., provision of on-site recreational amenities and open space and payment of the Dwelling Unit Construction Tax and Quimby fees, where applicable).

(b) Los Angeles Municipal Code

The Project would be subject to LAMC requirements intended to offset increased demand for parks and recreational facilities created by residential development projects. As

previously discussed, LAMC Section 12.33 sets park and recreational facility dedication and/or in lieu fee requirements for new residential subdivisions based on the maximum residential density at which a site may or will be developed. LAMC Section 12.33.H permits privately-held open space and recreational facilities developed within a project site to be credited against the Project's park dedication and/or in lieu fee requirement, as long as these facilities are available for use by all project residents and reduce that project's need for public recreation and park facilities. On April 5, 2017, the RAP Board of Commissioners approved payment of in-lieu fees for the Project via a recommendation to the Advisory Agency.⁵⁶

The Project would include development of 308 residential units on the 5.45-acre Project Site, resulting in a residential density of 57 units per acre. Based on the formula provided within LAMC Section 12.33.D, up to approximately 1.87 acres⁵⁷ of the Project Site would be required to be dedicated to the City, or equivalent in-lieu fees paid, for parkland and recreational facilities. The Project does not propose the dedication of any portion of the Project Site to the City for parks and recreational facilities.

As indicated in **Table IV.K.4-2, Project Open Space Requirements**, the Project would include the development of 308 residential units, for which LAMC Section 12.21.G would require the provision of 31,225 square feet of usable open space on the Project Site. Per Section 12.21.G, at least 50 percent (e.g., 15,612.50 square feet) of this open space must be common open space, with at least 25 percent of this common open space (e.g., 3,903.25 square feet) planted with ground cover, shrubs, or trees.

**TABLE IV.K.4-2
PROJECT OPEN SPACE REQUIREMENTS**

Proposed Residential Units	Quantity (units)	Factor (sf/unit) ^a	Open Space Requirement
Studio Apartments	73	100	7,300 sf
1BR Apartments	169	100	16,900 sf
2BR Apartments	49	100	4,900 sf
3BR Apartments	17	125	2,125 sf
Total	308	—	31,225 sf (0.72 ac)

NOTE(S):

^a Factors from LAMC Section 12.21.G.

SOURCE: ESA, 2018.

⁵⁶ City of Los Angeles Board of Recreation and Park Commissioners, Board Report, Vesting Tentative Tract Map (VTT) Np. 74765 – Recommendation to the Advisory Agency for Land Dedication of In-Lieu Park Fee Payment, April 5, 2017. Provided in Appendix L-4 of this Draft EIR.

⁵⁷ Land to be dedicated in acres (LD): $(308 \times 2.42) \times 0.00251 = 1.87$ acres for the Project

As previously discussed, the Project would include approximately 141,876 square feet (3.26 acres) of open space across the Project Site. Of the 141,876 square feet of open space across the Project Site, 73,848 square feet would be publicly accessible open space and would include the Northern Landscaped Area, Mesquit Paseo, North and South River Balconies, 7th Street Terrace, and the Public Plaza Flex Deck. The remaining 68,028 square feet would be common open space for use of Project residents, hotel guests, and employees and would include the Fitness Deck, Sculpture Garden, Work Breakout Deck, Residential Pool Deck, and the Hotel Rooftop Bar and Pool. Additionally, indoor gym facilities would be provided as part of the residential amenities. Approximately 7,089 square feet of the Project's open space would be part of the Option for a Park Easement to the City to extend the City's proposed PARC Improvements. In addition, approximately 26,491 square feet of the common open space would be landscaped, exceeding the City's landscape requirements for open space. Based on above, the Project would comply with the useable open space and landscape requirements of LAMC Section 12.21.G.

LAMC Section 21.10.3 sets a per-capita construction tax of \$200 per new eligible residential unit for City acquisition of new park space, with the set-aside or dedication of parkland and recreational facilities and/or payment of in-lieu fees under LAMC Section 12.33.H credited against the payment of this tax. As the Applicant would pay the \$200 tax per new eligible residential unit, per LAMC Section 12.33.G, the Project would be consistent with LAMC Section 21.10.3 dwelling unit construction tax requirements to support acquisition of new park space.

(c) *Conclusion*

Based on the above, with the proposed on-site open space and recreational facilities, in addition to the required payment of in-lieu fees, the Project would be consistent with and would exceed LAMC open space and parkland requirements. Implementation of regulatory requirements would ensure that the parkland standards would be addressed through compliance with applicable LAMC requirements. **Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts. Impacts would be less than significant.**

(d) *Project with the Deck Concept*

As stated in Chapter II, *Project Description*, the Applicant seeks to construct a Deck that extends over the off-site Railway Properties east of the Project Site. Under the Project with the Deck Concept, the Project residential population and associated demand for parks and recreation facilities would be the same, however, open space would increase to approximately 273,876 square feet or 6.29 acres, which would meet and exceed the PRP's recommendations for the provision of neighborhood and community recreational sites and facilities. The Project with the Deck Concept would also meet and exceed the useable open space and landscape requirements of LAMC Section 12.21.G. The Project

with the Deck Concept would also be required to pay in-lieu fees, similar to the Project. **Therefore, the Project with the Deck Concept would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts. Impacts would be less than significant.**

(2) Mitigation Measures

Impacts regarding parks were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding parks 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 Impacts

The nearest RAP park to the Project Site is the Arts District Park at 501 S. Hewitt Street, located approximately 0.4 miles northwest of the Project Site. This park is not located along major streets that would provide access to the Project Site during construction. The distance of this park from construction activity and the intervening development would avoid potential noise or conflict with construction worker activities. A small number of construction workers may visit a park to eat lunch or for recreational activity after a workday. However, construction workers are temporary employees with high turnover associated with the various phases of construction, so such park use would be rare and short-term. As a result, Project construction would not result in increased use of parks such that substantial deterioration would occur. The Project does not include or require the construction of recreational facilities that might have an adverse physical effect on the environment.

Therefore, Project construction would not result in increased use of existing neighborhood and regional parks or other recreational facilities such that substantial deterioration would occur or be accelerated. Construction of the Project would not include or require the construction, alteration or expansion of recreational facilities that might have an adverse physical effect on the environment.

(b) Operational Impacts

This analysis evaluates the Project's proposed provision of open space and demand for parks and recreational amenities associated with new residents.

As previously stated under Threshold (a), based on the Project's residential population of 743 residents, the Project would be required to provide approximately 1.50 acres each of neighborhood and community recreational sites and facilities, for a total of three acres, to meet the PRP's recommendations of 2.0 acres per 1,000 persons. The Project would incorporate 141,876 square feet or 3.3 acres of open space across the Project Site for use by Project residents, hotel guests, employees, and the general public. The Project's provision of open space would therefore exceed PRP's recommendation of three acres of neighborhood and community recreational sites and facilities based on the Project's projected residential population to meet the recommended 2.0 acres each of neighborhood recreation sites per 1,000 persons, as well as 2.0 acres of community recreational sites per 1,000 persons in the amended PRP. However, as previously discussed, the PRP parkland guidelines are Citywide goals and do not constitute requirements for individual development projects. The Project would also exceed the LAMC code requirement for the Project of 31,225 square feet. In addition to open space features, such as the Northern Landscaped Area, Fitness Deck, River Balconies, elevated pedestrian walkway connecting the River Balconies, Public Plaza Flex Deck, Sculpture Garden, and Productive Garden, Project residents would have access to a gym and a Pool Deck.

Although the Project would exceed LAMC requirements for open space, the PRP's recommendation for neighborhood and community recreational site acreage, and would include a gym and Pool Deck for residents, it is assumed that some Project residents would still patronize existing public parks and recreational facilities to some degree, including use of public park amenities, such as tennis courts, basketball courts, and sports fields. However, it is expected that Project resident use would be distributed across a number of recreational sites and facilities depending on the amenities offered at each location, such that substantial deterioration of facilities would not occur. Additionally, there is little potential that Project residents' and employees' use at any particular park or recreational facility would result in physical deterioration due to the Project's proposed open space and the potential for future new nearby parks and recreational facilities in the Project vicinity. There is also the potential for the 73,848 square feet of publicly accessible open space that the Project would provide to reduce the existing demand on nearby parks and recreational facilities. Moreover, through the payment of required in-lieu fees for parks and recreational facilities, the Project would be consistent with the LAMC Section 12.33 parkland requirements, which would require the Applicant to pay fees to offset park- and open space-related impacts of the Project. **Therefore, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Impacts would be less than significant.**

(c) *Project with the Deck Concept*

Similar to the Project, construction activities for the Project with the Deck Concept would similarly include construction workers who may visit a park or recreational facility. **However, as the workers are temporary employees, Project with the Deck construction would not result in increased use of existing neighborhood and regional parks or other recreational facilities such that substantial deterioration would occur or be accelerated. Construction of the Project with the Deck Concept would not include or require the construction, alteration or expansion of recreational facilities that might have an adverse physical effect on the environment.**

Under the Project with the Deck Concept, demand for parks and recreation facilities would be similar and the potential for such demand to result in substantial physical deterioration of existing facilities would be similar but further reduced with provision of the Deck. The Deck would serve as a connection between the 7th Street Bridge and the Project Site's Northern Landscaped Area. The Deck could include such amenities as a sculpture park, benches and seating areas, landscaping, and other visitor-serving features. The Deck would also offer additional space for programmed special events open to the public. Under the Project with the Deck Concept, on-site open space would substantially increase with up to approximately 273,876 square feet or 6.29 acres of open space.⁵⁸ Moreover, through the payment of required in-lieu fees for parks and recreational facilities, the Project with the Deck Concept would be consistent with the LAMC Section 12.33 parkland requirements, which would require the Applicant to pay fees to offset park- and open space-related impacts of the Project with the Deck Concept.

As the Project with the Deck Concept would provide an additional conveniently located open space area available to Project residents as compared to the Project, the Project with the Deck Concept would further reduce the use of and potential deterioration of existing parks and facilities. **Therefore, impacts under the Project with the Deck Concept related to increasing 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 would be less than significant.**

(2) Mitigation Measures

Impacts regarding parks and recreation were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding parks and recreation 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.

⁵⁸ This calculation assumes the Deck would extend approximately 132,000 square feet over the adjacent Railway Properties.

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

As further discussed above, the Project's provision of open space and recreational facilities would help offset demand for such facilities, and it is expected that residents, guests, and employees are likely to use on-site open space and recreational facilities to a greater extent than off-site facilities. In addition, the Project would pay Park Fees and comply with LAMC Sections 12.33 and 21.10.3, which would help fund construction of future off-site recreational facilities when and where needed. As the Project would largely offset demand for recreational facilities through provision of its own recreational facilities, such as the indoor gym facilities and Pool Deck for residents, and a Fitness Deck, Northern Landscaped Area and other open space amenities, it would not require construction or expansion of new recreational facilities. To the extent Project would generate some incremental demand that could lead to the need for construction of new or expanded recreational facilities, construction of such facilities and the potential for associated adverse effects on the physical environment are not foreseeable, particularly in light of facilities that are already proposed in the area, such as the proposed PARC improvements, which is an independent project going through its own environmental review process. **Therefore, the Project would not include recreational facilities or require the construction or expansion of recreational facilities which would have an adverse physical effect on the environment.**

As discussed above under Thresholds (a) and (b), the Project includes recreational facilities. The construction of these components of the Project and the potential for adverse physical effects on the environment are addressed within the construction related analyses provided in the topical sections in Chapter IV, *Environmental Impact Analysis*, of this Draft EIR.

(a) *Project with the Deck Concept*

The construction of these components of the Project with the Deck Concept and the potential for adverse physical effects on the environment are addressed within the construction related analyses provided in the topical sections in Chapter IV, *Environmental Impact Analysis*, of this Draft EIR. Under the Project with the Deck Concept, demand for recreation facilities would be similar and the potential for such demand to result in adverse physical effects on the environment would be similar but further reduced with provision of the Deck. As stated above, the Project with the Deck Concept would not increase the residential population on-site more than what is already provided by the Project, but would add additional open space areas to accommodate the demand for parks and recreational facilities, thus further reducing the demand of the residents on off-site recreational facilities. The Project with the Deck Concept would similarly pay Parks Fees and comply with LAMC Sections 12.33 and 21.10.3, which would

help fund construction of future off-site recreational facilities when and where needed. While the Project with the Deck Concept would increase the use of existing neighborhood and regional parks or other recreational facilities, the provision of a variety of open space and amenities within the Project with the Deck Concept would alleviate any potential substantial physical deterioration of existing park and recreation facilities. **Therefore, the Project with the Deck Concept would not include recreational facilities or require the construction or expansion of recreational facilities which would have an adverse physical effect on the environment.**

(2) Mitigation Measures

Impacts regarding parks and recreation were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding parks and recreation 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

Chapter III, *Environmental Setting*, of this Draft EIR, identifies 141 related projects that are anticipated to be developed in the Project vicinity. The RAP bases its evaluations of park space on the availability of park services for residents as opposed to employees or visitors to an area. Most park visits originate from people's homes and residents tend to prefer using local parks out of convenience. Typically, employees are engaged in their work during the day and do not contribute notable demand for parks. If they use the parks, such usage would occur during the week rather the weekend. Given the RAP methodology for evaluating park services, this cumulative analysis on parks and recreation focuses on the related projects that propose residential uses.

These related projects, in conjunction with the Project, would cumulatively generate the need for additional parks and recreational facilities. Similar to the Project, the residential population for the related projects was determined by multiplying the number of residential units by the average household size in the City of Los Angeles based on the 2018 Census American Community Survey 5-Year Estimate data.^{59,60} More detailed information and calculations regarding the Project's population are provided in Section IV.J, *Population*

⁵⁹ There are additional uses within the related projects that are not residential housing units that have been conservatively assumed to generate population, such as an assisted living facility and a jail. Therefore, the cumulative population generated by the related projects would be more than a direct multiplication of the 40,289 housing units and the Citywide Person Per Household factor for multi-family units.

⁶⁰ The average household size in the City of Los Angeles is based on 2018 Census American Community Survey 5-Year Estimate data (2014–2018).

and Housing, of this Draft EIR. As illustrated in **Table IV.K.4-3, Cumulative Impacts to Parks and Recreational Facilities**, the Project and related projects would result in a cumulative population growth of 101,831 residents.

**TABLE IV.K.4-3
CUMULATIVE IMPACTS TO PARKS AND RECREATIONAL FACILITIES**

	Housing Units	Population
Related Projects	40,289	101,088
Proposed Project	308	743
Total Cumulative	40,597	101,831

SOURCE: ESA, 2020.

These applicable related projects would be required to provide on-site open space pursuant to LAMC requirements, which would include accessible open space and common open space for each respective project's residents. Similar to the Project, the required provision of open space facilities located on-site would reduce the impact on off-site parks and recreational facilities. The amended PRP reflects the City's recognition of the need to update and modernize the original PRP characterizations of open space and amenities that are integrated into new developments, including plazas, space for farmer's markets, community gardens, and other nontraditional amenities.

As is the case with the Project, impacts on local parks from related projects would be reduced by the provision of on-site open space and recreational amenities. In acknowledgement of this, as previously discussed, LAMC Section 12.33 H, Credits, allows private recreational areas developed within a project site for use by the project's residents to be credited as meeting up to 35 percent of the land dedication and/or in lieu fee requirement. The applicable related projects would be required to pay in-lieu fees pursuant to LAMC Section 17.12, which is the City's parkland dedication ordinance that ensures compliance with the Quimby Act. Moreover, the use of off-site parks by related project residents can reasonably be expected to be distributed across the parks serving the Project and related projects, such that substantial physical deterioration of an individual park facility would be unlikely to occur.

The recommendations set forth in the PRP are Citywide in scope and are not intended to be requirements for individual development projects. The Project would introduce a new residential population to the Community Plan area, which would increase demand for and use of existing recreational sites and facilities. However, all related projects with residential uses would be required to comply with LAMC Sections 12.21 and 12.33, which require the provision of on-site open space and park facilities and/or payment of in-lieu fees to offset a project's impact to off-site park and recreational facilities. Payment of the fees by each respective related project, as applicable, would ensure that such

substantial physical deterioration would not occur or be accelerated and that all facilities would be maintained.

Therefore, with payment of the applicable fees, the Project and related projects 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; or include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment; or result in substantial adverse physical impacts associated with the provision of new or physically altered government 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. **Based on the above considerations, cumulative impacts on parks and recreational facilities would be less than significant.**

(a) *Project with the Deck Concept*

Cumulative impacts associated with parks and recreational facilities would be the same under the Project or the Project with the Deck Concept. Thus, the conclusions regarding cumulative impact significance presented above are the same and apply to the Project and the Project with the Deck Concept. **As such, cumulative impacts associated with parks and recreational facilities under the Project with the Deck Concept would be less than significant.**

(2) Mitigation Measures

Cumulative impacts regarding parks were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Cumulative impacts regarding parks 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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