

IV. Environmental Impact Analysis

L.3 Public Services – Parks and Recreation

1. Introduction

This section analyzes the potential impacts of the Project on parks and recreational facilities. The analysis addresses questions listed in Section XIV., Public Services – Parks; and Section XV., Recreation, in Appendix G of the State CEQA Guidelines (Appendix G). CEQA requires projects to analyze the physical impacts associated with the provision of new or altered facilities, the construction of which could cause significant environmental impacts and the physical deterioration of existing parks from new project demands. The demand for park and recreational facilities created by the Project is evaluated in light of the open space and recreational facilities to be provided as part of the Project and applicable City of Los Angeles (City) goals and regulatory requirements regarding the need for such facilities. Information and analysis in this section are based, in part, on existing service ratios, existing parks and recreational facilities, and other information provided by the Los Angeles Department of Recreation and Parks (RAP) in correspondence dated January 12, 2021. This correspondence is included in Appendix L of this Draft EIR.

2. Environmental Setting

a) Regulatory Framework

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

- City of Los Angeles Charter
- City of Los Angeles General Plan, including:
 - Framework Element
 - Open Space Plan
 - Public Recreation Plan,
 - Health and Wellness Plan
 - Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan
- Los Angeles Municipal Code

- Los Angeles Department of Recreation and Parks 2009 Citywide Community Needs Assessment
- Los Angeles Department of Recreation and Parks—50 Parks Initiative
- Park Proud LA Strategic Plan 2018-2022

(1) Local

(a) *The City of Los Angeles Charter*

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

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

(b) *City of Los Angeles General Plan*

(i) *Framework Element*

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

Chapter 6, Open Space and Conservation, and Chapter 9, Infrastructure and Public Services, of the Framework Element, contain policies and objectives that address the provision of parks within the City. These policies are presented in **Table IV.L.3-1, Relevant General Plan Framework Element Policies.**

**TABLE IV.L.3-1
RELEVANT GENERAL PLAN FRAMEWORK ELEMENT POLICIES**

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

**TABLE IV.L.3-1
RELEVANT GENERAL PLAN FRAMEWORK ELEMENT POLICIES**

Policy	Description
Framework Element – Chapter 9, Infrastructure and Public Services	
Policy 9.23.2	Prioritize the implementation of recreation and park projects in areas of the City with the greatest existing deficiencies.
Policy 9.23.5	Re-evaluate the current park standards and develop modified standards which recognize urban parks, including multi-level facilities, smaller sites, more intense use of land, public/private partnerships and so on.
Policy 9.23.7	Establish guidelines for developing non-traditional public park spaces like community gardens, farmer's markets, and public plazas.
Policy 9.24.1	Phase the development of new programs and facilities to accommodate projected growth.

SOURCE: City of Los Angeles, The Citywide General Plan Framework, An Element of the City of Los Angeles General Plan, re-adopted 2001.

(ii) Open Space Element

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

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

(iii) Service Systems Element - Public Recreation Plan

As a part of the General Plan's Service Systems Element, the Public Recreation Plan (PRP) establishes policies and standards related to parks and recreational facilities in the City. The PRP was adopted in 1980 by the Los Angeles City Council and amended by City

Council resolution in March 2016. The amendments modernize the PRP's recommendations and provide for more flexibility and equity in the distribution of funds used for the acquisition and development of recreational resources. The PRP also addresses the need for publicly-accessible neighborhood, community, and regional recreational sites and facilities across the City. The PRP focuses on recreational site and facility planning in underserved neighborhoods with the fewest existing resources and the greatest number of potential users (i.e., where existing residential development generates the greatest demand), as well as areas where new subdivisions, intensification of existing residential development, or redevelopment of "blighted" residential areas creates new demand.

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

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

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

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

(iv) Health and Wellness Element

The *City's Plan for a Healthy Los Angeles* lays the foundation to create healthier communities for all Angelenos. As an Element of the General Plan, it provides high-level policy vision, along with measurable objectives and implementation programs, to elevate

health as a priority for the City’s future growth and development. Chapter 3 of the Health and Wellness Element, Bountiful Parks and Open Spaces, outlines policies and objectives to increase the availability of parks through park funding and allocation, park expansion, the Los Angeles River, park quality and recreation programs, park safety, local partnerships, water recreation, and active spaces. Specifically, the objectives include:

- Increase the number of neighborhood and community parks so that every Community Plan Area strives for 3 acres of neighborhood and community park space per 1000 residents (excluding regional parks and open spaces).
- Increase access to parks so that 75 percent of all residents are within a 0.25-mile walk of a park or open space facility.
- Increase the number of schools (public, private, and charter) that have shared use agreements for community use outside of normal school hours by 25 percent.
- Increase the miles of the Los Angeles River that are revitalized for natural open space and physical activity, particularly in low-income areas.
- Increase the number of parks that feature or incorporate universally-accessible features.
- Improve the percentage of citywide population meeting physical fitness standards per week so that 50 percent of the population meets physical activity guidelines.

(v) *Community Plan*

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

The Project Site is located within the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan (Community Plan) area. With respect to recreation and parks, the Community Plan states that the “addition, expansion and/or improvement of needed local parks throughout the Community should be accelerated where feasible”.¹ In this regard, the Studio City Golf Course (also known as Weddington Golf & Tennis, a component of

¹ Los Angeles Department of City Planning, Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Update, May 13, 1998, page I-5.

the Project Site, is identified as a “Major Development Opportunity Site” for future use as public recreation and park space.²

According to the Community Plan, public parks, consisting of regional, community, neighborhood parks, and the majority of recreational areas in the Community Plan area are managed by the RAP. There are five neighborhood parks, two community parks, and two golf courses located within the Community Plan area. Of the two golf courses, one is private (the Lakeside Golf Course in Toluca Lake, and one is accessible to the public (the Studio City Golf Course, which is the Project Site). The Lakeside Golf Course is located 2.65 miles to the east of the Project Site. The Community Plan states that the diverse topography limits the placement of park sites south of Ventura Boulevard and that neighborhood parks located south of Ventura Boulevard offer limited recreational facilities for hillside homeowners. The community parks serve a much wider interest range due to the lack of sites in the hillside areas of the Community Plan area. While the existing parks satisfy the needs of the current residents, the community is still deficient in the number of neighborhood parks.³

Goal 4 of the Community Plan is to provide adequate recreation and park facilities to meet the needs of the residents in the Community Plan area. The objective and policies supporting this goal are as follows:

- Objective 4.1 Conserve, maintain, and better utilize existing recreation and park facilities which promote the recreational experience.
- Policy 4-1.1 Preserve the existing recreational facilities and park space and
- Policy 4-1.2 Increase accessibility to the Los Angeles River.

The Project’s consistency with the applicable Community Plan objective and policies are evaluated in Appendix J, Land Use Plans and Policies - Project Consistency Tables, of this Draft EIR.

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

In 2009, the Department of Recreation and Parks (RAP) commissioned an update of the last Recreation and Parks Needs Assessment from 1999 as a preliminary step in developing a citywide park master plan and five-year capital improvement plan. The report provides an inventory of existing facilities, defines geographic areas of need and recommended facilities to serve specific populations, and identifies priorities for additional parks and recreation facilities. The report provides a more current assessment of

² Los Angeles Department of City Planning, Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Update, May 13, 1998, page I-6.

³ Los Angeles Department of City Planning, Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Update, May 13, 1998, page III-11.

conditions and future needs compared to the PRP, while the PRP recommends the ratios of park acreage per person used in the analysis.

The Citywide Community Needs Assessment (Needs Assessment) divides the RAP's jurisdiction (the City) into seven geographic districts. The geographic district in which the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan area is located is the South San Fernando Valley district. According to the Needs Assessment, significant variation exists related to prioritized facility and program rankings, which are based on the levels of demand in the City's seven different geographical areas. In the South San Fernando Valley, of the 26 recreational uses ranked by the RAP, walking and biking trails are ranked No. 1, small neighborhood parks are ranked No. 2, nature trails are ranked No. 4, indoor gyms are ranked No. 8, outdoor tennis courts are ranked No. 9, outdoor swimming pools are ranked No. 12, nature/environment centers are ranked No. 13, golf courses/driving ranges are ranked No. 19, youth soccer fields are ranked No. 21, and adult soccer fields are ranked No. 25.⁴

(d) *50 Parks Initiative*

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

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

The Park Proud LA Strategic Plan (Parks Strategic Plan) is the most recent strategic plan for the RAP, effective from 2018 until 2022. The 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.

⁴ City of Los Angeles Department of Recreation and Parks, 2009 Citywide Community Needs Assessment, Final Report, Figure 1.8.1a, *Prioritized Facility and Program Needs by Geographic Area*, page 54.

b) Existing Conditions

(1) RAP Facilities and Ratios

The RAP is responsible for the establishment, operation, and maintenance of public parks and recreational facilities in the City. These facilities include parks, swimming pools, public golf courses, recreation centers, museums, youth camps, tennis courts, sports programs, and programs for senior citizens. The RAP also supervises construction of new facilities and improvements to existing ones. Currently, the RAP maintains over 16,000 acres of parkland within 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, 9 dog parks; 187 summer youth camps; and help 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, and Cabrillo Marine Aquarium.⁵

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. According to the RAP, the City currently has an estimated existing Citywide ratio of 0.84 acre of neighborhood and community parkland per 1,000 residents. The City's PRP sets a goal of a parkland acres-to-population ratio of 10 acres of parkland per 1,000 residents. According to the RAP, data regarding the level of use for the off-site public parks and recreational facilities that serve the Project area are not available.⁶ The RAP further states that, while data are not available, such resources within the surrounding community are heavily utilized and often overburdened.⁷

(2) Existing Parks in the Project Area

According to the RAP, the nearest public parks to the Project Site are the Studio City mini park located approximately 0.5 mile to the northwest of the Project Site and the Studio City Recreation Center, located approximately 0.7 mile to the north of the Project Site.⁸

⁵ City of Los Angeles Department of Recreation and Parks, Who We Are, <https://www.laparks.org/departments/who-we-are#:~:text=We%20are%20the%20Department%20of,the%20valley%20to%20the%20sea>, accessed March 12, 2021.

⁶ City of Los Angeles Department of Recreation and Parks, Request for Information Regarding Recreational and Park Services for the Harvard-Westlake River Park Project in the City of Los Angeles, prepared by Darryl Ford, dated January 12, 2021 (letter provided in Appendix L of this Draft EIR).

⁷ City of Los Angeles Department of Recreation and Parks, Request for Information Regarding Recreational and Park Services for the Harvard-Westlake River Park Project in the City of Los Angeles, prepared by Darryl Ford, dated January 12, 2021 (letter provided in Appendix L of this Draft EIR)

⁸ City of Los Angeles Department of Recreation and Parks, Request for Information Regarding Recreational and Park Services for the Harvard-Westlake River Park Project in the City of Los Angeles, prepared by Darryl Ford, dated January 12, 2021 (letter provided in Appendix L of this Draft EIR)

The Studio City mini park consists of a small, landscaped space within the Studio City Library grounds and does not provide an active recreational opportunity. None of the neighborhood or community parks listed below are located to the south of Moorpark Street within the Studio City area. Because the RAP's PRP provides a service radius standard of 0.5 mile for a neighborhood park and a service radius of two miles for community parks, the distances shown in the following **Table IV.L.3-2, Distances of RAP Recreational facilities from the Project Site**, provide the straight line radius distances between the Project Site and neighborhood, community, and regional parks. It is noted, however, that these distances are substantially different from driving or walking distances, which are frequently twice as long as the indicated radii. The table also indicates a shortage of public parks within easy walking distance (0.25 mile) from the residential neighborhood in proximity to the Project Site and from neighborhoods to the south of the Project Site. **Figure IV.L.3-1, Map of Neighborhood, Community, and Regional Parks**, illustrates the location of the area's parks relative to the Project Site.

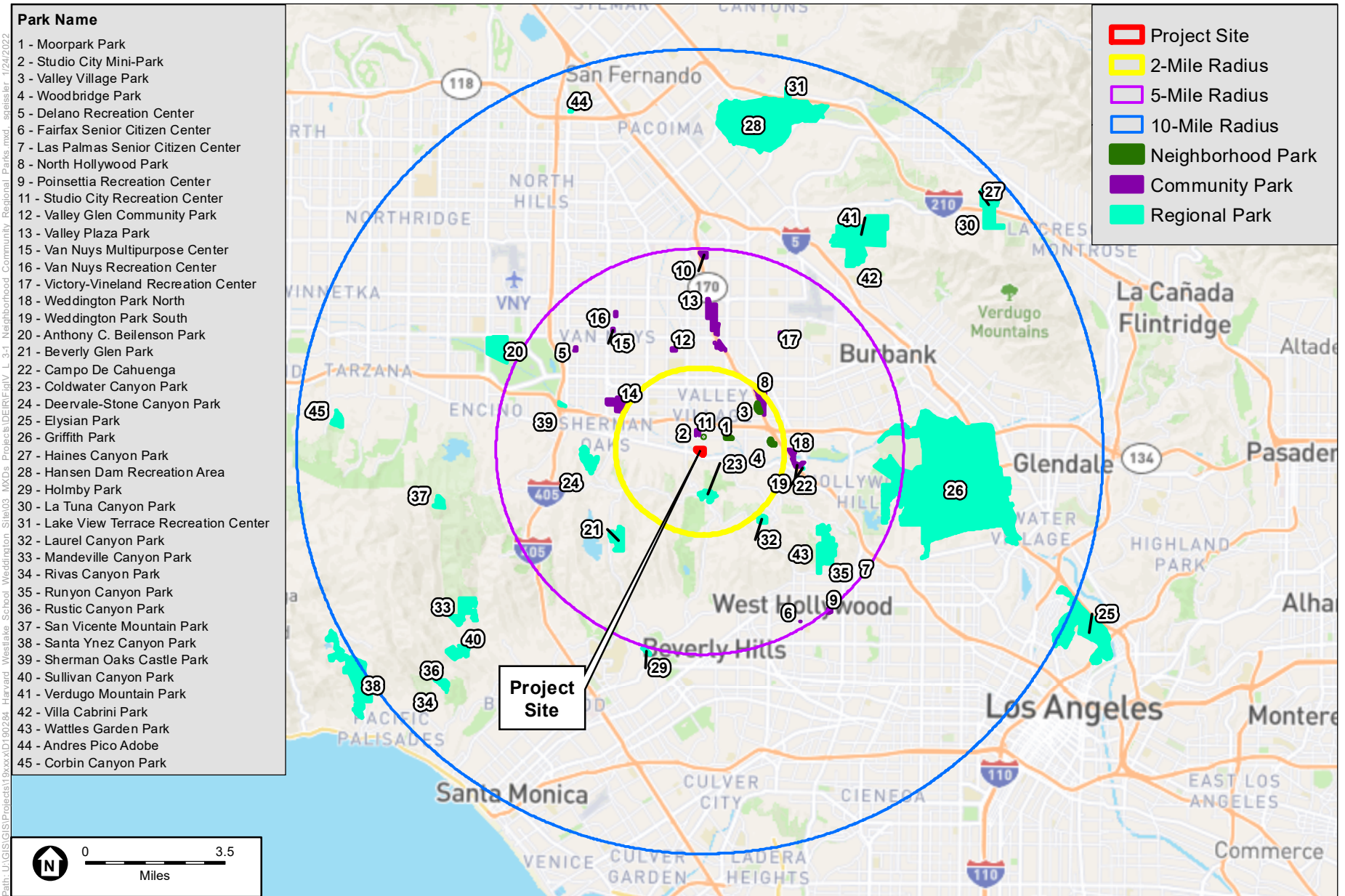
**TABLE IV.L.3-2
DISTANCES OF RECREATIONAL FACILITIES FROM THE PROJECT SITE**

Name of Facility	Address	Distance
Neighborhood Parks within 2 miles of the Project Site		
Studio City Mini-Park	12505 W. Moorpark Street	0.3 mile
Moorpark Park	12061 W. Moorpark Street	0.6 mile
Woodbridge Park	11240 W. Moorpark Street	1.6 miles
Valley Village Park	5000 N. Westpark Drive	1.6 miles
Community Parks within approximately 5 miles of the Project Site		
Studio City Recreation Center	12505 W. Moorpark Street	0.3 mile
North Hollywood Park	11430 W. Chandler Boulevard	2.0 miles
Weddington Park - North	10844 W. Acama Street	2.1 miles
Weddington Park - South	10600 W. Valleyheart Drive	2.2 miles
Van Nuys-Sherman Oaks Park	13201 W. Huston Street	2.3 miles
Valley Glen Community Park	6150 Atoll Avenue	2.5 miles
Valley Plaza Park	12240 W. Archwood Street	2.5 miles
Delano Park	15100 W. Erwin Street	2.7 miles
Victory-Vineland Recreation Center	11117 W. Victory Boulevard	3.3 miles
Strathern Park - North	8041 N. Whitsett Avenue	4.8 miles
Van Nuys Multipurpose Center	6514 N. Sylmar Avenue	3.6 miles
Van Nuys Recreation Center	14301 W. Vanowen Avenue	3.8 miles
Las Palmas Senior Citizen Center	1820 N. Las Palmas Avenue	4.7 miles
Fairfax Senior Citizen Center	7929 Melrose Avenue	5.0 miles
Pointettia Recreation Center	7341 Willoughby Avenue	5.0 miles

**TABLE IV.L.3-2
DISTANCES OF RECREATIONAL FACILITIES FROM THE PROJECT SITE**

Name of Facility	Address	Distance
Regional Parks within approximately 10 miles of the Project Site		
Coldwater Canyon Park	12601 Mulholland Drive	0.9 mile
Laurel Canyon Mulholland Park	8100 W. Mulholland Drive	2.1 miles
Deervale - Stone Canyon Park	14890 W. Valley Vista Boulevard	2.5 miles
Sherman Oaks Castle Park	4989 N. Sepulveda Boulevard	3.4 miles
Campo de Cahuenga	3919 Lankershim Boulevard	2.5 miles
Wattles Garden Park	1824 N. Curson Avenue	3.7 miles
Beverly Glen Park	2448 N. Angelo Drive	2.7 miles
Runyon Canyon Park	2000 N. Fuller Avenue	3.4 miles
Holmby Park	601 Club View Drive	5.0 miles
Anthony C. Beilenson Park	6300 N. Balboa Boulevard	5.2 miles
Villa Cabrini Park	9401 W. Cabrini Drive	6.0 miles
Verdugo Mountain Park	9999 S. Edmore Place Villa	5.8 miles
Griffith Park	4730 Crystal Springs Drive	6.4 miles
San Vicente Mountain Park	17500 W. Mulholland Drive	6.5 miles
Rivas Canyon Park	Easterly Terminus Oracle Place	7.3 miles
Mandeville Canyon Park	2660 N. Westridge Road	7.5 miles
Sullivan Canyon Park	N/E of Sullivan Fire Road	7.6 miles
Rustic Canyon Park	SW of Sullivan Fire Road	7.8 miles
Hanson Dam Recreation Center	12074 Osborne Street	8.5 miles
La Tuna Canyon Park	6801 La Tuna Canyon Road	8.8 miles
Corbin Canyon Park	4720 N. Corbin Avenue	8.9 miles
Andres Pico Adobe	10940 N. Sepulveda Boulevard	9.0 miles
Lake View Terrace Recreation Center	11075 Foothill Boulevard	9.2 miles
Haines Canyon Park	7021 W. Arama Avenue	9.5 miles
Elysian Park	929 Academy Road	9.5 miles
Santa Ynez Canyon	1100 N. Palisades Drive	9.9 miles

SOURCE: City of Los Angeles Department of Recreation and Parks, Request for Information Regarding Recreational and Park Services for the Harvard-Westlake River Park Project in the City of Los Angeles, prepared by Darryl Ford, dated January 12, 2021 (letter provided in Appendix L of this Draft EIR). Mileage provided by ESA.



SOURCE: Open Street Map 2021; City of Los Angeles Open Data: <https://data.lacity.org/>, Accessed November 2020; ESA 2021.

Harvard-Westlake River Park Project

Figure IV.L.3-1
Map of Neighborhood, Community, and Regional Parks

(3) On-Site Recreational Facilities

The Project Site has historically operated as the Weddington Golf & Tennis club (sometimes referred to as the Weddington facilities) in which the public, for a fee, has had use of the existing, nine-hole, 27-par golf course and the Project Site's 16 lighted tennis courts. Additional facilities include a putting green and driving range, a 2,700-square-foot clubhouse with a 10-seat café, and a 799-square-foot tennis shack. The nine-hole golf course comprises approximately 426,000 square feet (9.78 acres), and the 25-stall driving range has a 2,300-square-foot golf canopy. The driving range features net fencing, reaching a maximum height along certain sections of approximately 100 feet. The driving range is lit by six golf ball-shaped light standards positioned between the driving range stalls and the surface parking lot. The Weddington Golf & Tennis site also includes 89 surface parking spaces.

The hours of operation for Weddington Golf & Tennis are from 7:00 a.m. to sunset daily for golf, 7:00 a.m. to 11:00 p.m. daily for the driving range, and 7:00 to 10:00 p.m. daily for the tennis courts. Lights for the driving range and tennis courts (128 lights) are turned on daily at sunset and remain on for up to 30 minutes following the closing of the driving range and tennis courts in order to allow for cleaning and maintenance at the end of the day.

The School purchased Weddington Golf & Tennis in 2017 and has continued to operate it primarily for golf and tennis uses with “for-fee” access as under prior conditions. The School's uses, following the acquisition, have consisted of tennis team practices and tournaments on a portion of the tennis courts and occasional use of the driving range and golf course by the School's golf teams and summer camp.

(a) *Tennis Court Facilities*

The majority of tennis courts are used for lessons from paid instructors, and open courts are available throughout the day. In addition, tennis courts are used by the School for practice and tournaments.

As shown in **Table IV.L.3-3**, the current demand for the on-site tennis courts, on average, is 91 one-hour sessions per weekday and 74 sessions per weekend day. This indicates that the courts are not used to maximum capacity at any period throughout a typical weekday or weekend.

Currently, the Project Site also hosts approximately ten matches, such as those offered by the San Fernando Valley Tennis League – San Fernando Valley East at the Project Site during the year. The majority of these matches take place during weekends and are available to public participants.

**TABLE IV.L.3-3
EXISTING USE OF ON-SITE TENNIS COURTS**

Weekday Hours	Average Number of Courts in Use
7:00 a.m. to 8:00 a.m.	1 court, 1 session
8:00 a.m. to 11:00 a.m.	10 courts, 30 sessions
11:00 a.m. to 4:00 p.m.	5 courts, 25 sessions
4:00 p.m. to 8:00 p.m.	9 courts, 36 sessions
8:00 p.m. to 10:00 p.m.	2 courts, 4 sessions
<i>Total Weekday Use</i>	<i>96 sessions</i>
Weekend Hours	Average Number of Courts in Use
7:00 a.m. to 8:00 a.m.	4 courts, 4 sessions
8:00 a.m. to 11:00 a.m.	12 courts, 36 sessions
11:00 a.m. to 4:00 p.m.	6 courts, 30 sessions
4:00 p.m. to 8:00 p.m.	2 courts, 8 sessions
<i>Total Weekend Use</i>	<i>78 sessions</i>
Total Weekly Use	174 sessions
SOURCE: Harvard-Westlake School (Tennis Facilities Operator), 2021	

A survey of the geographic origins of daily participating tennis players, performed the week of September 16-22, 2019, showed that participants derived from 74 regional zip codes. Although highly dispersed, the highest number of players originated in Studio City, Sherman Oaks, Van Nuys, North Hollywood, and Toluca Lake. A number of players derive from Sun Valley, Hollywood, West Hollywood, Lake View Terrace and other communities throughout the San Fernando Valley and Los Angeles area.

(b) Golf Course Facilities

As discussed above, the golf course facilities at the Project Site include a nine-hole golf course, a driving range, and a putting green. The course, which plays 911 yards is generally available to walk in (non-reservation) users, serving on average, approximately 100 golfers per weekday. Demand increases during the weekends to approximately 150 golfers per day (individuals, not groups of golfers). Since the course is typically played in groups of two to four, with groups of four comprising most weekend rounds, this would represent 25 to 50 rounds per weekday, and 38 to 50 rounds per weekend day. The existing use represents a fraction of the use of a typical nine-hole golf course, which (as represented by the RAP's municipal golf courses) is approximately 250 rounds per day (or 500 to 1,000 players per day assuming that each round at municipal courses is played by two to four players). The practice/driving range serves approximately 185 users per weekday and 250 users per weekend day. Although not specifically surveyed, based on the range of existing users' zip codes maintained by the operator, it is estimated that the

users of the Weddington golf course come from areas throughout the San Fernando Valley and areas of west Los Angeles and Hollywood.

(4) Off-Site Tennis Courts with Public Access

The City provides a wide range of public tennis facilities. The RAP tennis facilities in the east San Fernando Valley (the area in which the majority of existing users of the Project Site reside), as well as schools that have tennis courts for public use, include free-to-the-public tennis courts and fee-required courts. Existing public courts or private courts to which the public has access in the area are listed in **Table IV.L.3-4, *Tennis Courts in the East San Fernando Valley Available to the Public***, below. The geographic location of courts in Table IV.L.3-4 reflects the origins of existing users of the Project Site. As shown in Table IV.L.3-4, there are 58 public courts that do not charge a fee and 50 fee-required public courts in the geographic area served by the Weddington facilities. The off-site no-fee courts are available on a “first-come, first-served” basis and the fee-required courts are available with reservations. Fees for tennis courts in the City’s RAP system are approximately \$12.00 per hour. With the exception of the three school sites (Grant High School, North Hollywood High School, and Valley College), all of the “no fee” courts are public courts operated and maintained by the RAP. Because current tennis players at the Weddington facility reside primarily in the east San Fernando Valley, courts located in the east San Fernando Valley are listed in Table IV.L.3-4. However, some members who use the Weddington tennis facilities also reside in Hollywood, Burbank, Toluca Lake and areas within the west Los Angeles basin, and would have access to additional public tennis facilities in those communities, not listed in Table IV.L.3-4.

**TABLE IV.L.3-4
TENNIS COURTS IN THE EAST SAN FERNANDO VALLEY AVAILABLE TO THE PUBLIC**

Name of Tennis Facility	Address	Number of Courts	Evening Play and Lighting	East Valley Tennis League Matches during each of two yearly seasons
No Fee-Required Tennis Facilities				
Grant High School	13000 Oxnard Street	4 courts	No	0
Lake View Terrace Recreation Center	11075 Foothill Boulevard	2 courts	Yes	2
North Hollywood High School	5231 Colfax Avenue	5 courts	No	31
North Hollywood Park	5301 Tujunga Avenue	5 courts	Yes	7
Pacoima-Bradford Park	13310 Branford Street	2 courts	Yes	0
Panorama Park	8600 Hazeltine Avenue	4 courts	No	4
Richie Valens Park	10731 Laurel Canyon Boulevard	2 courts	Yes	3

**TABLE IV.L.3-4
TENNIS COURTS IN THE EAST SAN FERNANDO VALLEY AVAILABLE TO THE PUBLIC**

Name of Tennis Facility	Address	Number of Courts	Evening Play and Lighting	East Valley Tennis League Matches during each of two yearly seasons
San Fernando – Sepulveda Recreation Center	8801 Kester Avenue	4 courts	Yes	2
Studio City Recreation Center (Beeman Park)	12621 Rye Street	4 courts	No	0
Sun Valley – Sun Valley Park	8133 Vineland Avenue	2 courts	Yes	0
Valley Plaza Park	6520 St Clair Avenue	4 courts	Yes	22
Van Nuys Recreation Center	14301 Vanowen Avenue	3 courts	Yes	34
<i>Total Courts for Public (non-fee) Use</i>		<i>41 courts</i>		
Fee Required Tennis Facilities Operated by the RAP				
Beverly Garland Tennis Center	4222 Vineland Avenue	2 courts	Yes	0
Encino Balboa Tennis Center	5651 N. Balboa Boulevard	16 courts	Yes	20
Van Nuys – Sherman Oaks Tennis Center	14201 Huston Street	8 courts	Yes	28
Private Courts Available to the Public for a Fee				
Glenridge Tennis Club	2760 Claray Drive	4 Courts	No	2
<i>Total Courts for Public (fee-required) Use</i>		<i>50 courts</i>		
Total Public Courts with public access in the San Fernando East Service Area		71 courts		

SOURCE: San Fernando Valley Tennis League, https://www.tennissfvalley.com/San_Fernando_Valley-Tennis-Courts?id=236, Accessed February 9, 2021.

(5) Off-Site Nine-Hole Golf Courses

The nearest nine-hole golf courses are listed in **Table IV.L.3-5, *Nine-Hole Golf Courses in the Nearby Region.***

**TABLE IV.L.3-5
NINE-HOLE GOLF COURSES IN THE REGION**

Golf Course	Location	Distance from Project Site	Other Facilities
Van Nuys Golf Course (private - open to the public)	6550 Odessa Avenue	7.9 miles via US-101	Driving Range, Practice Putting Green and Cafe
Los Feliz Municipal Golf Course (public - RAP)	3207 Los Feliz Boulevard	11.3 miles via CA-134	Practice Putting Green and Cafe
Roosevelt Municipal Golf Course (public – RAP)	2650 N. Vermont Avenue	12.3 miles via US 101	Practice Putting Green and Cafe
Heroes Golf Course (private - open to the public)	11301 Wilshire Boulevard	13.4 miles via I-405 10.5 miles via Coldwater Canyon	Practice Putting Green
Armand Hammer/Holmby Park Pony Golf Course (Par 3) (private - open to the public)	601 Club View Drive	9.0 miles and 22 minutes via Beverly Glen Drive	Practice Putting Green
Rancho Park Golf Course (Par 3) (public - RAP)	10460 W. Pico Boulevard	9.4 miles via Coldwater Canyon Drive	Driving Range (at 18-hole facility), Practice Putting Green, and Cafe
Penmar Municipal Golf Course (public - RAP)	1233 Rose Avenue	17.2 miles via I-405	Practice Putting Green and Cafe

NOTE: The estimated distances are consistent with Google Maps approximations, researched at 4:15 PM, February 9, 2021.

SOURCE: ESA, 2021

All the municipal (RAP) golf courses and listed private courses (Van Nuys, Heroes, and Armand Hammer) are available to the public with tee-time reservations. During the COVID-19 pandemic, many of the City’s recreational facilities and other municipal services were closed or restricted for public use; however, the municipal golf courses were open and in operation. Further, it is noted that golf and tennis reservation availability, as surveyed in February and March 2021, is likely to be less than at other times given that golf and tennis were among the few outdoor activities broadly permitted by Los Angeles County COVID-19 health guidelines. During this time, several same-day tee times were available for the Roosevelt Municipal Golf Course, the Los Feliz Municipal Golf Course, the Rancho Park

Municipal Golf Course, and the Penmar Municipal Golf Course.^{9,10,11,12,13} According to the RAP’s City of Los Angeles Golf Courses, the municipal golf courses are currently open to the public between 6:30 a.m. and 6:45 a.m. and accommodate up to 250 rounds per day. Regarding municipal courses, the Reservation Desk described the Los Feliz Golf Course as being particularly light, with tee times available throughout the weekday and weekends.¹⁴ According to the RAP, the Los Feliz Golf Course has a capacity of 250 rounds per day, with an average use of 180 rounds per day on a weekday and 210 rounds per day on a weekend. This indicates that the Los Feliz Golf Course would have at least 70 unfilled, or available, rounds per weekday and 40 unfilled rounds per weekend. The Rancho Park golf course was also described as below capacity during weekdays, averaging 200 rounds with a capacity of 250 rounds per day on weekdays, but would be closer to capacity on weekends.¹⁵ The more heavily used municipal courses, such as the Roosevelt Golf Course and the Penmar Golf Course, generally required several-day, in-advance reserved playing times, while the lightly used courses would allow for same-day reservations.

Tee times were also available throughout the day at the Van Nuys Golf Course, a private course available for public use. Greens fees range from \$7.50 to \$18.00 at municipal courses and are approximately \$19.00 at the Van Nuys Golf Course. According to the Course Manager, the Van Nuys nine-hole golf course accommodates a maximum of 300 rounds of golf per day on a “first come, first served” basis.¹⁶

Practice putting greens are available at municipal courses and a driving range with putting greens are available at the nine-hole Van Nuys Golf Course. Driving ranges accessible

⁹ Roosevelt Golf Course at: <https://www.golfnow.com/tee-times/facility/12220-roosevelt-golf-course/search#sortBy=Date&view=Grouping&holes=3&timeperiod=3&timemax=42&timemin=10&players=0&pricemax=10000&pricemin=0>, accessed March 25, 2021

¹⁰ Los Feliz Municipal Golf Course at: https://www.golfnow.com/tee-times/facility/16836-los-feliz-municipal-golf-course/search?gclid=Cj0KCQiApY6BBhCsARIsAOI_GjZ8Z1UZaDiHhbLEUK4VPa0DpLoXe1cDa5Zi92utSic8l2GwmVgnuL4aAqpCEALw_wcB#sortBy=Date&view=Grouping&holes=3&timeperiod=3&timemax=42&timemin=10&players=0&pricemax=10000&pricemin=0, accessed March 25, 2021.

¹¹ Rancho Park Municipal Golf Course at: <https://www.golfnow.com/customer/login-redirect>. Accessed March 25, 2021.

¹² Penmar Municipal Golf Course at: https://www.golfnow.com/tee-times/facility/12219-penmar-golf-course/search?gclid=Cj0KCQiApY6BBhCsARIsAOI_Gja1KMblz8doq04fPcw6fDAecqC4fhDHZ4gjZT4D2NWjXyhLAE7F-bcaAtBWEALw_wcB#sortBy=Date&view=Grouping&holes=3&timeperiod=3&timemax=42&timemin=10&players=0&pricemax=10000&pricemin=0, accessed March 25, 2021

¹³ The existing golf course data represents the available data provided by private operators during preparation of the Draft EIR.

¹⁴ City of Los Angeles Department of Recreation and Parks, City of Los Angeles Golf Division, email from Rick Reinschmidt, Acting Golf Manager, rick.reinschmidt@lacity.org, April 5, 2021.

¹⁵ City of Los Angeles Department of Recreation and Parks, City of Los Angeles Golf Division, email from Rick Reinschmidt, Acting Golf Manager, rick.reinschmidt@lacity.org, April 5, 2021.

¹⁶ Van Nuys Golf Course (Nine Hole), Course Manager, telephone interview (818-785-8871), Friday, 9:30 a.m., March 26, 2021.

to the public for a fee are also available at various 18-hole golf courses throughout the San Fernando Valley, including the RAP's Woodley Lakes Golf Course in Van Nuys and the Balboa/Encino Golf Course in Encino in the San Fernando Valley.

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, 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 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 RAP).

b) Methodology

The analysis of parks and recreation impacts is typically based on an estimate of a residential population increase that could potentially place additional demand on existing park and recreational facilities. The Project does not contain a residential component that would increase the use of existing parks and recreational uses. However, the Project

would result in the removal of existing private, fee-only recreational facilities, including a nine-hole, 27-par golf course and driving range, and 16 tennis courts, eight of which would be replaced and relocated on the Project Site. As such, the focus of the analysis is on the removal of eight of the existing tennis facilities and the removal of golf facilities on the Project Site, other than the putting green which would remain as part of the Project, and potential effects on public tennis and nine-hole, 27-par golf courses in the area due to current users of Weddington’s facilities shifting their activities. The analysis evaluates the following three distinctive thresholds: (1) the need to construct new facilities to maintain service ratios or other performance objectives for parks, (2) the deterioration of existing public park facilities due to increased demand, and (3) whether the construction and operation of a new facility would cause environmental impacts.

The analysis of impacts to parks and recreational facilities identifies the potential demand that would be generated by the Project and the potential for that additional demand to result in the need for expansion of existing and/or new facilities, the deterioration of existing facilities, or result in environmental impacts associated with the construction of new facilities. The analysis also considers the extent to which Project-provided park and recreational facilities would fulfill City goals and policies and reduce demand for such facilities.

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) 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 or other performance objectives for parks?

(1) Impact Analysis

(a) Construction

The Project’s construction workers would be drawn from an existing regional labor pool whose workers move between construction projects on a short-term basis without requiring relocation. Workers traveling to or from work, or during a lunch break, may utilize a park that is outside of their residential neighborhood. Such park use would be incidental and typical of workers throughout the region. Such variations would occur on short-term

bases. Therefore, there would be no notable increase in park usage at the parks serving the area due to the Project's construction workers, and, therefore, there would be no need for the construction of additional park facilities to accommodate the construction population.

The existing on-site uses, including the tennis courts, golf course, driving range, café, and putting green, would be vacated throughout the construction phase, and no on-site facilities would be available to the current tennis and golf users. Accordingly, Weddington's displaced tennis and golf users would potentially increase demand at other facilities.

Regarding tennis court use during construction, tennis league matches currently occurring at the Project Site would need to be relocated to another San Fernando Valley East facility listed in Table IV.L.3-4. Although demand at off-site facilities would increase due to the loss of the Weddington Golf & Tennis courts during construction, tennis court users would have access to 71 free and fee-required public courts in the San Fernando Valley East Tennis League network. According to the websites for the Los Angeles Department of Recreation and Parks' fee-required tennis courts, certain courts, such as the Sherman Oaks Tennis Center and the Encino Balboa Tennis Center, require reservations. The lead times for reservations at the time of this writing range from less than one day to three days,¹⁷ thus, indicating the availability of open courts throughout a typical week. In addition, the League matches currently held at the Project Site would be accommodated within the 71-tennis court system listed in Table IV.L.3-4, above. The School's existing intermural matches, if not suspended, would relocate for the interim to other participating campuses.

Existing clients of Weddington tennis courts come from a wide geographical area, including the San Fernando Valley, Hollywood, and other parts of Los Angeles. If such clients choose to use off-site courts in this region, they would have access to a large number of free, "first-come, first-served" courts and public courts that charge a fee. Accordingly, demand from relocated users would be spread over a large area and would not focus entirely on the courts nearest the Project Site. Regarding public tennis courts that require reservations, the reservation system at off-site courts would control the hours and rate of use and would reduce the overall wear and tear on the concrete courts and, thus, would not exceed the design capacity of the affected facilities. Therefore, the temporary use of off-site tennis courts during construction would not require the provision of new or physically-altered public tennis courts in order for the RAP to maintain adequate service ratios.

The Project's construction activities would also result in the displacement of approximately 100 weekday and 150 weekend fee-required daily golf course users. Assuming golfers would seek out similar nine-hole playing opportunities, this would

¹⁷ Los Angeles Department of Recreation and Parks, <https://www.laparks.org/sports/tennis/pay>, accessed February 11, 2021.

increase demand on the private Van Nuys nine-hole golf course and the City's four nine-hole golf courses (e.g., Roosevelt Golf Course, Los Feliz Golf Course, Rancho Park, and Penmar Golf Course), and would increase demand on the region's driving ranges. As with the RAP's fee-required tennis facilities, all golf course activity is conducted on a reserved tee-time basis. A survey of the websites of the nearby Van Nuys Golf Course and four municipal courses in the area determined that tee times are available daily. Although demand for golfing has increased slightly during the COVID-19 pandemic because outdoor activities, such as golf, are permitted by Los Angeles County COVID-19 health guidelines, and other types of recreational activity, such as indoor racketball and basketball facilities have been closed or open on a limited basis, the City of Los Angeles Golf Courses Reservation Desk described the Los Feliz Golf Course as being light, typically reaching less than 80 percent of its 250-round per day capacity.¹⁸ This indicates that the Los Feliz Golf Course would have at least 50 unfilled, or available, rounds per day. The Rancho Park golf course was also described by the Reservation Desk as below capacity during weekdays but closer to capacity on weekends. The Weddington Golf Course serves, on average, 100 individuals on each weekday and 150 individuals on each weekend day. In groups of two to four (standard practice for golf courses), this represents 25 to 50 rounds per weekday, and 38 to 50 rounds per weekend day (groups of four are encouraged on busier weekends at all golf courses). Because existing municipal golf courses have available capacity to accommodate the relocated golfers from the Weddington Golf Course, who generate 38 to 50 rounds of golf, without exceeding the RAP's service ratio of 250 rounds per day for municipal courses (the daily round capacity of the Los Feliz and Rancho Park Golf Courses), the relocation of golfers is not expected to increase demand at a level that would foreseeably require the provision of new or physically-altered public golf courses.

In conclusion, the Project's construction workers or the relocation of tennis and golf users during Project construction is not expected to require the need for new or physically-altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios. As such, impacts to public parks and recreational facilities during Project construction would be less than significant.

(b) Operation

The Project would not include a residential component and, thus, would have no impact on existing public parks and recreational facilities caused by population increase. In addition, while the Project would eliminate play-for-fee golf and eight of 16 tennis courts available for fee, it would substantially increase publicly-available parkland for a wide variety of users in the nearby neighborhood and broader community. The Project would also support field, pool, and gym-based sports by members of the community when not in use by the School. Public use of the eight tennis courts, for a fee to cover maintenance, security, and staff as under existing conditions, when not in use by the School would

¹⁸ City of Los Angeles Department of Recreation and Parks, City of Los Angeles Golf Courses, Reservation Desk, telephone interview (818-291-9980), 10:00 a.m., March 26, 2021.

continue with reservations. In addition, the Project would provide daily and continuous access to 5.4 acres (235,224 square feet) of landscaped open space and a 0.75-mile long pedestrian path. The pedestrian path would also provide a new connection to the Zev Greenway for casual exercise by individuals or families. The multi-purpose gymnasium would include a community room available for use by reservation for meetings and gatherings by organizations. As described in Chapter II, Table II-3, Public Use Days and Hours, of this Draft EIR, the clubhouse, café, and putting green, as well as the pedestrian path and water features, would be open to the public daily from 7:00 a.m. to 9:00 p.m. These areas, comprising approximately seven acres, would be separated from the athletic facilities by walls, decorative fencing, and/or landscaped berms to allow for safe, simultaneous use of the Project Site by multiple groups, including simultaneous School and public uses. Similarly, other Project features, such as the swimming pool, gymnasium courts, and athletic fields, would be available to the public when not in use by the School.

Further, the Project would include features that would reduce the demand for recreation and park facilities through the provision of walking trails, which are the No. 1 recreational priority in the RAP 2009 Citywide Community Needs Assessment's South San Fernando Valley geographic area. Of the 26 recreational uses ranked by the RAP, walking and biking trails are ranked No. 1, small neighborhood parks are ranked No. 2, nature trails are ranked No. 4, indoor gyms are ranked No. 8, outdoor tennis courts are ranked No. 9, outdoor swimming pools are ranked No. 12, nature/environment centers are ranked No. 13, golf courses/driving ranges are ranked No. 19, youth soccer fields are ranked No. 21, and adult soccer fields are ranked No. 25, respectively, in the geographic region.¹⁹

The range of recreational uses provided by the Project, the full-time public access to walking trails, and the improved access to the Zev Greenway under the Project would also meet the objective of the Community Plan to better utilize existing park and recreational facilities to promote a broader recreational experience for the community (Objective 4.1). In addition, the use of the Project for public trail access would fulfill the Community Plan's designation of the Project Site as an "Opportunity Site" for future recreational use. Direct trail access through the publicly-access open space to the Zen Greenway under the Project would improve accessibility to the Los Angeles River as recommended under Community Plan (Policy 4-1.2). Therefore, by meeting objectives that were developed based on recognized needs the Project would reduce demand on the area's parks and recreational facilities.

Also, because no public neighborhood or community parks are located in Studio City to the south of Moorpark Street, the Project would provide a neighborhood park use that would serve the surrounding neighborhood nearer Ventura Boulevard. The Project would meet the objective of the Health and Wellness Element to "Increase the number of schools (public, private, and charter) that have shared use agreements for community park use

¹⁹ City of Los Angeles Department of Recreation and Parks, 2009 Citywide Community Needs Assessment, Final Report, Figure 1.8.1a, *Prioritized Facility and Program Needs by Geographic Area*, Page 54.

outside of normal school hours by 25 percent”.²⁰ In addition, because the Project Site’s public uses would be located within an approximately 0.25-mile radius of the adjacent neighborhood, it would meet the objective of the Health and Wellness Element to “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.”²¹ With respect to the adjacent residential community, the Project would meet the PRP’s 0.5-mile radius standard,²² compared to existing conditions in which such proximity or walkability does not currently exist between any neighborhood park and the surrounding neighborhood. In fact, the nearest neighborhood parks to the Project Site are the Studio City Mini-Park (0.3 mile from the Project Site) and Moorpark Park (0.6 mile from the Project Site), both of which are at a distance in excess of the 0.25-mile standard for walkability under the City’s Health and Wellness Element. Furthermore, the Studio City Mini-Park is located within the grounds of the Studio City Library and does not provide for trails or other recreational opportunities. The proximity of the Project Site to the surrounding residential neighborhood and the offering of recreational opportunities and park uses that do not currently exist in the area, would reduce demand on other local park facilities (excluding public tennis and golf facilities) and would not result in the need for new or physically altered parks and recreational uses in order for the RAP to maintain adequate service ratios.

(i) *Reduction in Tennis Facilities*

Table IV.L.3-6, *Projected Capacity of Future, On-Site Tennis Courts*, illustrates the average weekday and weekend use of the existing 16 tennis courts and the future capacity of the Project’s eight tennis courts. As shown in Table IV.L.3-6, the existing tennis courts provide, on average, 96 sessions during a single weekday and 78 sessions during a weekend day, for a total week average of 174 sessions. The future tennis courts would have the capacity to accommodate 88 sessions per weekday and 104 sessions per weekend day, for a total week capacity of 192 sessions. The table reflects the School’s use of the tennis courts on weekdays between 3:00 p.m. and 6:00 p.m., which is a conservative assumption since the School would not use all eight courts every weekday during the year, particularly during summer months and School breaks. In addition, outside the hours of 8:00 a.m. to 11:00 a.m. and 4:00 p.m. to 8:00 p.m., the Project would have capacity to accommodate the same number of sessions as the current facility. In addition, on weekends, there would be adequate capacity offered by the Project’s eight courts, other than between the hours of 8:00 a.m. and 11:00 a.m. Although the weekday capacity would be 8 sessions below the existing average daily use, the weekend, during which the School would generally not conduct School-associated tennis, has a capacity of 26 sessions more than the current average use. As such, over a period

²⁰ 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 54.

²¹ 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 54.

²² The Public Recreation Plan of the Public Services Element states that the general service radius for neighborhood parks is approximately 0.5 mile. Source: City of Los Angeles Department of City Planning, Public Recreation Plan, October 9, 1980, page 3.

of a week, the Project would have adequate capacity to accommodate the same number of tennis court sessions as the current Weddington Golf & Tennis facility.

**TABLE IV.L.3-6
PROJECTED CAPACITY OF FUTURE, ON-SITE TENNIS COURTS**

Weekday Hours	Average Courts in Use – Existing Conditions	Capacity of the Project’s Tennis Courts
7:00 a.m. to 8:00 a.m.	1 court, 1 session	8 courts, 8 sessions
8:00 a.m. to 11:00 a.m.	10 courts, 30 sessions	8 courts, 24 sessions
11:00 a.m. to 4:00 p.m.	5 courts, 25 sessions	8 courts, 32 sessions (up to 3:00 p.m.)
4:00 p.m. to 8:00 p.m.	9 courts, 36 sessions	8 courts, 16 sessions (6:00 p.m. to 8:00 p.m.)
8:00 p.m. to 10:00 p.m.	2 courts, 4 sessions	8 courts, 8 sessions (up to 9:00 p.m.)
<i>Total Weekday Use</i>	<i>96 sessions</i>	<i>88 sessions</i>
Weekend Hours	Courts in Use	
7:00 a.m. to 8:00 a.m.	4 courts, 4 sessions	8 courts, 8 sessions
8:00 a.m. to 11:00 a.m.	12 courts, 36 sessions	8 courts, 24 sessions
11:00 a.m. to 4:00 p.m.	6 courts, 30 sessions	8 courts, 40 sessions
4:00 p.m. to 8:00 p.m.	2 courts, 8 sessions	8 courts, 32 sessions
<i>Total Weekend Use</i>	<i>78 sessions</i>	<i>104 sessions</i>
Total Weekly Sessions	174 sessions	192 sessions

SOURCE: Harvard-Westlake School (Tennis Facilities Operator), 2021

However, the reduction in tennis courts from 16 to 8 available to the public and hours of use during weekdays and Saturdays when the courts would be used by the School, indicates that some tennis players would either need to conduct their tennis activities at other times of the day or other days when there is ample court availability, than under existing conditions, or relocate to other tennis facilities in the area.

As discussed above, 71 courts available to the public in the area serving the San Fernando Valley East Tennis League. Many of these are “first come-first served” with no fees, and other RAP courts require reservations and an hourly fee. The reservation websites for large tennis facilities in the area, such as the Sherman Oaks Tennis Center and the Balboa Tennis Center, indicate the availability of courts during a standard weekday.²³ Tennis facilities at North Hollywood Park, Studio City Recreation Center (Beeman Park) also indicated availability of courts during weekdays. The Project’s tennis courts would be

²³ Websites for these uses were accessed on Thursday, February 11, 2021, during clear weather and temperatures of 64 degrees. Field check for available tennis courts at North Hollywood Park and Studio City Recreation Center was performed at 11:00 a.m. on the same day.

available on weekdays prior to 3:00 p.m., when school is in session, and in the later evening hours between 6:00 p.m. and 9:00 p.m., and has availability on the weekend, which is the highest demand period for the existing Project Site’s facilities and the City’s tennis courts. The availability of tennis courts at the Project Site under the Project would offset some demand for off-site tennis courts caused by the removal of the existing courts. Although the Project would result in a small number of relocated users, weekday use of off-site courts is anticipated to be available and would not exceed the carrying capacity of the City’s public tennis courts. In addition, the Project would be able to continue to host league matches as under existing conditions. Therefore, the Project is not anticipated to increase demand for use of tennis courts at a level that would foreseeably result in substantial adverse physical impacts due to the need for new or physically-altered public tennis courts in order for the RAP to maintain adequate service ratios.

(ii) *Elimination of the Nine-Hole Golf Course*

The existing nine-hole golf course and driving range would be permanently removed so that current users would need to relocate to other, similar facilities or use any of the number of other full-length, regulation, municipal or publicly-available courses. At present, a survey of existing nine-hole golf courses, the nearest of which is the Van Nuys Golf Course (a private course available for public use),²⁴ indicates that tee times openings are “first-come, first-served” and are available daily. According to the RAP’s Los Angeles City Golf Reservation Office, the Los Feliz Municipal Golf Course, which typically fills less than 80 percent of its 250-round-per day capacity (service ratio), has at least 50 unfilled rounds per day. This could accommodate 100 golfers in groups of two, and 200 golfers in groups of four. As such, this course has substantial available capacity on weekdays and through the weekend that would be available to additional users. The Rancho Park Municipal Golf Course (nine-hole) typically has unused capacity weekdays, and other nine-hole golf courses, listed in Table IV.L-3-4, above, have available tee times with reservations.²⁵

The Weddington Golf Course serves, on average, 100 individuals each weekday and 150 individuals on weekend days. In groups of two to four (standard practice for golf courses), this represents 25 to 50 rounds per weekday, and 38 to 50 rounds per weekend day. Groups of four are encouraged on busier weekends at all golf courses, which would represent 38 rounds from the Weddington Golf Course that would need to be replaced. Because the Los Feliz Golf Course has the capacity to accommodate 70 additional rounds during weekends and 40 additional rounds during weekdays (with the Rancho Park Golf Course able to accommodate 50 additional rounds on weekdays),²⁶ existing municipal nine-hole courses, particularly in conjunction with other nine-hole courses (such

²⁴ According to the Van Nuys Golf Course manager, tee times, which are available on a “first-come, first served” basis, are available throughout the day and an increase in users could be accommodated. Telephone conversation, Friday, March 26, 2021.

²⁵ City of Los Angeles Department of Recreation and Parks, City of Los Angeles Golf Courses, Management Desk, telephone conversation, March 26, 2021.

²⁶ City of Los Angeles Department of Recreation and Parks, City of Los Angeles Golf Division, email from Rick Reinschmidt, Acting Golf Manager, rick.reinschmidt@lacity.org, April 5, 2021.

as the Van Nuys Golf Course) would have available capacity to accommodate the displaced Weddington golfers without exceeding the RAP's service ratios for such facilities. As described earlier, this assumes that all current users of the Weddington Golf Course would seek to play at other nine-hole courses, which is a conservative assumption since golfers could also play at full-length, regulation courses. The implementation of reservations at municipal courses, as well as available capacity at other public and private (available to the public) courses, would ensure that the potential increase in use resulting from the displacement of current Weddington users would not exceed the capacity of these facilities. While the loss of the on-site golf facilities would pose an inconvenience for current users, the increased demand for use of other facilities is not expected to foreseeably result in the need for new or physically-altered public, nine-hole golf courses, in order for the RAP to maintain adequate service ratios.

(iii) Conclusion

As described above, the Project would provide all-day public access to 5.4 acres of landscaped walking trails, direct access to the Zev Greenway, and public use of the community room in the gymnasium building in an area that lacks neighborhood park facilities. Other facilities, such as the multi-purpose athletic fields, swimming pool, gymnasium sports, and eight tennis courts, would be available to the public with reservations. These features would reduce demand for off-site parks and recreation uses and meet the criterion of neighborhood park uses within walking distance of the surrounding neighborhood, as well as provide the highest priority recreational uses (walking paths) and high priority uses (gymnasium and swimming pool) identified in the RAP's Citywide Community Needs Assessment for the South San Fernando Valley geographic area.

Therefore, the Project would not require the need for new or physically-altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios. Impacts to public parks and recreational facilities during Project operation would be less than significant.

(2) Mitigation Measures

Impacts were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts 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

As discussed under Threshold (a), the Project would not include a residential component that would increase demand on existing neighborhood, community, or regional parks and result in the substantial physical deterioration of existing parks or accelerate the physical deterioration of existing parks. In addition, as described in detail under Threshold (a), above, the Project would provide open space and recreational uses for the public that would potentially reduce the demand on public use parks and recreational facilities in the local area.

As discussed under Threshold (a), above, the Project would reduce the number of tennis courts and time periods during which tennis courts would be available to the public. However, under existing conditions at the Project Site, only a portion of tennis courts are in concurrent use and empty courts are often available throughout the day. Although the proposed 8 tennis courts (replacing the existing 16 courts) would be used by the School on weekdays between 3:00 p.m. and 6:00 p.m., the replacement courts would be substantially available to the public at other times on weekdays and the weekends (by reservation). As shown in Table IV.L.3-6, the Project's new courts would accommodate more total weekly sessions than the average current use, despite a reduction in average weekday capacity and on weekends between 8:00 a.m. and 11:00 a.m. Existing users who seek to play tennis on a weekday during the time period the courts are in use by the School, or during time periods when there is a reduction in capacity compared to existing conditions, may choose to play at off-site locations.

A large number of off-site courts are available in the south and east San Fernando region. The area served by the region's primary tennis league includes approximately 41 free public courts and 50 fee-required public courts. The free public courts are "first-come, first-served," and the fee-required courts are provided by reservation only. The reservation system controls the rate of use of these facilities. The area's public tennis courts are hard surface, concrete pads that are able to accommodate continuous use. The RAP does not provide clay courts, which would be subject to greater maintenance. With controls on the use of courts affected by required reservations, the hard surface, concrete construction of courts, and the continued provision of tennis courts for public use at the Project Site, the potential impact related to the partial displacement of users from the existing Weddington tennis courts is not expected to result in substantial or accelerated physical deterioration of the area's existing public tennis courts, shown in Table IV.L.3-4, above. With the implementation of reservations that limit use, as well as the physical character of these courts (hard, concrete pad construction), the Project is not anticipated to increase the use of existing neighborhood and regional tennis court facilities such that substantial physical deterioration of the facility would occur or be accelerated.

The Project would result in the permanent relocation of golfers who currently use the Weddington nine-hole golf course and driving range. The Project, however, would retain the existing practice putting green. It was determined in the prior analysis under Threshold (a) that the RAP's nine-hole golf courses in the region, such as the Los Feliz and Rancho Park Courses, have adequate combined capacity to accommodate the existing Weddington Golf Course users. Fees are charged at all of the City golf courses to offset the strict maintenance regimes required for golf courses. The fee structure is based on the level of use and is increased during the hours of heaviest demand. Tee-time reservations are also required for the use of the City's golf courses. With the reservation systems, which control the rate of use, and the requirement of fees needed for course maintenance, the users would not exceed the carrying capacity of these facilities and, as such, the Project is not anticipated to increase the use of existing neighborhood and regional golf course facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Therefore, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Impacts would be less than significant.

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Impacts regarding parks and recreation services 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

The Project would provide a modern gymnasium, multi-purpose athletic fields, tennis courts, pool, pathways, and landscaped open space, which would be used by the School and the public. The construction and operation of these recreational facilities and the associated potential for adverse physical effects on the environment are the subject of this Draft EIR as evaluated throughout the 18 environmental topic areas (i.e., Biological Resources, Soils and Geology, Land Use, Transportation, etc.) presented in this chapter (Chapter IV, *Environmental Impact Analysis*) of this Draft EIR. As described herein, the Project would result in a short-term significant and unavoidable construction noise impact. This impact, however, would not continue with the operation and use of the Project.

As described under Threshold (a), above, the Project would provide full-time, daily public access to approximately 5.4 acres of landscaped walking paths, as well as provide public access by reservations to the athletic facilities (tennis courts, swimming pool, gymnasium, Park athletic fields) on the Project Site when the facility is not actively in use by the School. No reservations would be required for the putting green. With the provision of such facilities, the Project, in general, would reduce demand on the City's neighborhood and community parks in the area by both students and the public. As such, it would potentially reduce future demand for the expansion of, and need for the construction of new, public recreational facilities in the area.

Besides the environmental topic areas evaluated and the impact determinations presented in this Draft EIR, no additional adverse physical effects on the environment caused by operation and use of the Project's recreational facilities or off-site recreational facilities would occur. Therefore, impacts with respect to construction or expansion of recreational facilities, which might have an adverse physical effect on the environment, would be less than significant.

(2) Mitigation Measures

Impacts were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts 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 five related projects that are anticipated to be developed in the Project vicinity. The RAP calculates its availability of park space according to residential density, 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 in an area are engaged in their work during the day and do not contribute notable demand for parks. Given the RAP methodology for evaluating park services, this cumulative analysis on parks and recreation focuses on the related projects that propose residential uses.

The related projects, in conjunction with the Project, would cumulatively generate the need for additional parks and recreational facilities. Similar to, and in addition to, the Project, the increase in cumulative development, which includes a net increase in 566 dwelling units, 160,620 square feet of commercial/retail uses and other non-residential uses, would generate an increase in service population and a demand for park and recreational uses. However, because residential uses generate a population increase

(permanent increase in the service population) and create a respective increase in demand for public parks and recreational uses, residential uses are required to provide either recreational and open space within the project, and/or to contribute in-lieu fees for the maintenance or expansion of new recreational uses. The purpose of the latter is to off-set the increased demand for public parks and recreational services. The latter may also include any RAP facilities, including tennis courts and golf facilities if warranted by the population increase. The related projects' 566 dwelling units are anticipated to result in a population increase of approximately 1,370.²⁷

New multi-family residential uses typically provide on-site recreational uses, such as pools, spas, common areas, and workout rooms, that reduce impacts on parks and recreational resources. LAMC Section 12.33 H, Credits, which do not apply to commercial uses such as the Project, allows private recreational areas developed within a project 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 also 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. Should any residential developments not incorporate park and recreation facilities pursuant to LAMC Sections 12.21 and 12.33, they would be required to pay an in-lieu fee to the "Park and Recreational Sites and Facilities Fund" for the acquisition and development of park and recreational sites and facilities, pursuant to LAMC Section 21.10.3. Payment of the fees by each respective related project, as applicable, would ensure that the RAP would maintain adequate service ratios and performance objectives at the City's parks and recreational facilities.

As a non-residential use, the Project would be exempt from such fees. However, as discussed above, the Project would reduce the number of existing, on-site tennis courts and eliminate the existing 9-hole golf course and driving range. As such, the Project would potentially increase demand on the City's public tennis courts and golf courses by Weddington's current users. However, the use of reservations at approximately half of the City's public tennis courts and all of the municipal golf courses would control the rate of use of tennis and golf facilities, as well as maintain the performance objectives of these facilities. With the implementation of reservations, any relocated golf and tennis users from the existing Weddington golf and tennis facility would not increase demand at the City's public golf and tennis facilities that would exceed the design parameters or capacities of these services. In addition, the Project would also provide approximately 5.4 acres of publicly-accessible open space and landscaped trails connecting to the adjacent Zev Greenway and on-site landscaped areas and water features. In addition, the Project would allow public use (with reservations) of the eight, on-site tennis courts, athletic fields, gymnasium, and swimming pool. Because these uses would be available

²⁷ Based on 2017 Census American Community Survey 5-Year Estimate data (2013–2017) for City of Los Angeles average household of 2.42 per unit.

to the public, they have the potential to reduce public use of local neighborhood and community parks and, thus, would reduce impacts on public parks.

Although the Project would increase demand on the area's off-site public tennis courts and golf courses, reservations that would control the rate of these uses would be required. In addition, required fees for certain public tennis courts and all municipal golf courses would provide for maintenance and upkeep of these uses. As such, the Project would not substantially contribute to the deterioration or accelerated deterioration of the area's public parks and public tennis courts and golf facilities.

Regarding related projects, with provision of required on-site open space and standard on-site recreational uses (such as swimming pools and weight rooms) and/or payment of the applicable in-lieu fees, related projects in combination with the Project would not increase the use of existing neighborhood and regional parks such that substantial physical deterioration of the facilities would occur or be accelerated. **Based on the above considerations, although the Project would increase demand on public tennis courts and municipal golf facilities, the Project's contribution to cumulative 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, or other performance objectives for parks and recreation would not be cumulatively considerable. As such, cumulative impacts on parks and recreational facilities would be less than significant.**

(2) Mitigation Measures

Cumulative impacts regarding parks and recreation were determined to be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts with regard to 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.