

IV. Environmental Impact Analysis

I.4 Public Services – Parks and Recreation

1. Introduction

This section analyzes the potential impacts of the Project on public parks and recreational facilities. The analysis addresses questions listed in Section XIV, Public Services – Parks, and Section XV, Recreation, in Appendix G of the State CEQA Guidelines (Appendix G). CEQA requires projects to analyze the physical impacts associated with the provision of new or altered facilities, the construction of which could cause significant environmental impacts and the physical deterioration of existing parks from new project demands. The demand for park and recreational facilities created by the Project is evaluated in light of the open space and recreational facilities to be provided as part of the Project and applicable City of Los Angeles (City) goals and regulatory requirements regarding the need for such facilities. Information and analysis in this section is based, in part, on existing service ratios, existing parks and recreational facilities, and other information provided by the Los Angeles Department of Recreation and Parks (RAP) in correspondence dated May 12, 2022. This correspondence is included in Appendix I-4 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:

- Quimby Act
- City of Los Angeles Charter
- City of Los Angeles General Plan, including:
 - Framework Element
 - Open Space Plan
 - Public Recreation Plan,
 - Health and Wellness Plan
 - Central City 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

(1) State

(a) *Quimby Act*

California Government Code Section 66477, also known as the Quimby Act, was enacted by the California legislature in 1965. The Quimby Act authorizes cities and counties to enact ordinances requiring the dedication of land, or the payment of fees for park and/or recreational facilities in lieu thereof, or both, by developers of residential subdivisions as a condition to the approval of a tentative tract map or parcel map. As discussed below, the City implemented the Quimby Act in the City through the adoption of Los Angeles Municipal Code (LAMC) Sections 17.12, 12.33 and 19.17.

(2) Local

(a) *The City of Los Angeles Charter*

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

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

(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.I.4-1, Relevant General Plan Framework Element Policies.**

**TABLE IV.I.4-1
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, childcare centers, or decentralized schools.

**TABLE IV.I.4-1
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 was prepared in June 1973 to provide an official guide to the City Planning Commission, the City Council, the Mayor, and other governmental agencies and interested citizens for the identification, preservation, conservation, and acquisition of open space in the City. This document distinguishes open space areas as privately or publicly owned, and includes goals, objectives, policies, and programs directed towards the regulation of privately owned lands both for the benefit of the public as a whole, and for protection of individuals from the misuses of these lands. In addition, this document discusses the acquisition and use of publicly owned lands and recommends further implementation of studies and actions to guide development of open space in the City. Furthermore, in order to address the standards and criteria of identifying open space, this document describes various contextual factors that may affect open space, including, but not limited to: recreation standards; scenic corridors; density and development; cultural or historical sites; safety, health, and social welfare; environmental and ecological balance; and unique sites.

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

(iii) Service Systems Element - Public Recreation Plan

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

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

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

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

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

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

(iv) Health and Wellness Element

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

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

- Increase the number of neighborhood and community parks so that every Community Plan Area strives for three 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 Central City Community Plan (Community Plan) area. The Community Plan’s Government and Public Facilities subsection sets forth specific “Open Space and Recreation” policies and objectives. The Community Plan, however, does not refer to any of the discussed facilities as “parks.” The referenced open space and recreation objectives and policies are provided in **Table IV.1.4-2, *Relevant Central City Community Plan Objectives and Policies***.

**TABLE IV.I.4-2
RELEVANT CENTRAL CITY COMMUNITY PLAN OBJECTIVES AND POLICIES**

Goal/Objective/Policy	Description
Objective 4-1	To encourage the expansion and additions of open spaces as opportunities arise.
Objective 4-2	To maximize the use of the City's existing and envisioned open space network and recreation facilities by providing connections to the open space.
Policy 4-2.1	To foster physical and visual links between a variety of open spaces and public spaces Downtown.
Objective 4-3	To encourage increased use of existing park and recreational spaces.
Objective 4-4	To encourage traditional and non-traditional sources of open space by recognizing and capitalizing on linkages with transit, parking, historic resources, cultural facilities, and social services programs.
Policy 4.4-1	Improve Downtown's pedestrian environment in recognition of its important role in the efficiency of Downtown's transportation and circulation systems and in the quality of life for its residents, workers, and visitors

SOURCE: City of Los Angeles, Central City Community Plan, 2003.

(c) Los Angeles Municipal Code

In September 2016, the City adopted Ordinance No. 184,505, Parks Dedication and Fee Update Ordinance (Park Fee Ordinance). The aim of the Park Fee Ordinance is to increase the opportunities for park space creation and expand the fee program beyond those projects requiring a subdivision map to include a park linkage fee for all net new residential units. The Park Fee Ordinance amends LAMC Sections 12.21, 12.33, 17.03, 17.12 and 17.58, deletes LAMC Sections 17.07 and 19.01, and adds LAMC Section 19.17. The Park Fee Ordinance increases Quimby in-lieu fees, provides a new impact fee for non-subdivision projects, eliminates the deferral of park fees for market rate projects that include residential units, increases the fee spending radii from the site from which the fee is collected, provides for early City consultation for subdivision projects or projects with over 50 units in order to identify means to dedicate land for park space, and updates the provisions for credits against park fees. The Park Fee Ordinance went into effect on January 11, 2017.

LAMC Section 12.21 G requires that all residential developments containing six or more dwelling units on a lot provide, at a minimum, the following usable open space area per dwelling unit: 100 square feet for each unit having less than three habitable rooms, 125 square feet for each unit having three habitable rooms, and 175 square feet for each unit having more than three habitable rooms. LAMC Section 12.21 G also identifies what

areas of a project would qualify as usable open space for the purposes of meeting the project's open space requirements.

As stated in LAMC Section 12.21 G, usable open space is defined as areas designated for active or passive recreation and may consist of private and common areas. Common open space areas must be readily accessible to all residents of the site and constitute at least 50 percent of the total required usable open space. Common open space areas can incorporate recreational amenities such as swimming pools, spas, picnic tables, benches, children's play areas, ball courts, barbecue areas, and sitting areas. A minimum of 25 percent of the outdoor common open space area must be planted with ground cover, shrubs, or trees. Indoor recreational amenities can account for up to 25 percent of the usable open space requirements. Private open space is defined in an area that is contiguous to and immediately accessible from an individual dwelling unit, may have a dimension no less than six feet in any direction and must contain a minimum of 50 square feet, of which no more than 50 square feet per dwelling unit can be counted towards the total required usable open space.

LAMC Section 12.33, *Park Fees and Land Dedication*, authorized under the Quimby Act, requires developers of most residential projects to dedicate land and/or pay in-lieu fees for parks and recreational facilities. Specific requirements are determined based on the type of project and number of units. Under LAMC Section 12.33 D, the area of land within a residential subdivision that is required to be dedicated for parks and recreational uses is determined by the formulas provide therein. Land dedication and in-lieu fee payment are subject to the restrictions set forth in Section 12.33 (i.e., land must be used for park or recreational uses and fees must be used for the acquisition or development of, and not the operation or maintenance of, park land).

LAMC Section 12.33 G, *Affordable Housing Exemption*, allows new residential dwelling units that are rented or sold to persons or households of very low, low, or moderate income to receive an affordable housing exemption from the park fee and land dedication requirement. An affordable housing unit shall receive an exemption from the requirement for dedication of land for park and recreational purposes and/or payment of the park fee if the affordable housing unit is affordable to a household at or below 120 percent of the area median income. In projects with a mix of market-rate and affordable units, only the affordable housing units shall receive this exemption.

LAMC Section 12.33 H, *Credits*, allows private recreational areas developed within a project site for use by the particular project's residents to be credited as meeting up to 35 percent of the project's calculated land dedication and/or in-lieu fee requirement. Recreational areas that qualify under this provision of LAMC Section 12.33 H include, in part, indoor recreation areas, gyms, swimming pools, and spas (when the spas are an integral part of a pool complex). Furthermore, in accordance with LAMC Section 12.33 H.2, the recreational areas proposed as part of a project must meet the following standards in order to be credited against the requirement for land dedication: (1) each facility is available for use by all of the residents of a project; and (2) the area and the

facilities satisfy the park and recreation needs of a project so as to reduce that project's need for public recreation and park facilities.

LAMC Section 21.10.3, *Dwelling Unit Construction Tax*, establishes the payment of a dwelling unit construction tax of \$200 per new residential unit. The tax is to be paid to a "Park and Recreational Sites and Facilities Fund" for the acquisition and development of park and recreational sites and facilities. If park and recreation provisions (i.e., fees, improvements, or land dedication) have been made pursuant to LAMC Section 12.33, the fair market value of those provisions is credited against the payment of this tax.

Pursuant to LAMC Sections 17.12 and 17.58, a final subdivision map shall not be approved or recorded, unless a park fee has been paid or land within the subdivision has been dedicated to the City for park or recreational purposes. Park fee rates for residential subdivision and non-subdivision residential projects are identified in LAMC Section 19.17 and adjusted for inflation annually..

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

In 2009, RAP commissioned an update of the last Recreation and Parks Needs Assessment from 1999 as a preliminary step in developing a citywide park master plan and five-year capital improvement plan. The report provides an inventory of existing facilities, defines geographic areas of need and recommended facilities to serve specific populations, and identifies priorities for additional parks and recreation facilities. The report provides a more current assessment of conditions and future needs compared to the PRP, while the PRP recommends the ratios of park acreage per person used in the analysis.

(e) *50 Parks Initiative*

In response to the 2009 Citywide Community Needs Assessment, 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.

b) Existing Conditions

(1) RAP Facilities and Ratios

RAP is responsible for the establishment, operation, and maintenance of 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. RAP also supervises construction of new facilities and improvements to existing ones. Currently, RAP maintains over 16,000 acres of parkland within 490 regional, community and neighborhood parks, 411 playgrounds, 319 tennis courts, 123 recreational centers, over 130 outdoor fitness areas, 59 swimming pools and

aquatic centers, 29 senior centers, 27 skate parks, 13 golf courses, 12 museums, 13 dog parks, 187 summer youth camps, and helps support the Summer Night Lights gang reduction and community intervention program. 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. RAP oversees Griffith Park and operates Venice Beach, and Cabrillo Marine Aquarium.¹

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.² According to the Los Angeles Countywide Comprehensive Park and Recreation Needs Assessment from 2016, the Central City Community Plan Area has a parkland to resident ratio of neighborhood and community parks of 0.04 acres of neighborhood and community parkland per 1,000 residents, while the City of Los Angeles has an overall ratio of 0.84 acres of neighborhood and community parkland per 1,000 residents.³ 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.

(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 following parks are within a 2-mile radius of the Project Site: 18 neighborhood parks; 14 community parks; and one regional park.

The following RAP facilities are classified as neighborhood parks and are located within a 2-mile radius of the Project Site:

1. 6th and Gladys Street Park, located at 624 East 6th Street
2. Aliso Triangle, located at 1304 East Pleasant Avenue
3. Arts District Park, located at 501 South Hewitt Street
4. Brooklyn Heights Park (aka 318 Mathews Street), located at 318 North Mathews Street
5. City Hall Park, located at 200 North Spring Street
6. El Pueblo De Los Angeles Historic Monument, located at 845 North Alameda Street
7. Everett Park, located at 1010 North Everett Street

¹ RAP, Who We Are, <https://www.laparks.org/department/who-we-are>, accessed September 14, 2022.

² City of Los Angeles, *Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan*, approved October 9, 1980.

³ Cathie M. Santo Domingo, Assistant General Manager, Planning, Maintenance, and Construction Branch, citing the Los Angeles Countywide 2016 Comprehensive Plan and Recreation Need Assessment in the RAP letter correspondence dated May 12, 2022. Provided in Appendix I-4 of this Draft EIR.

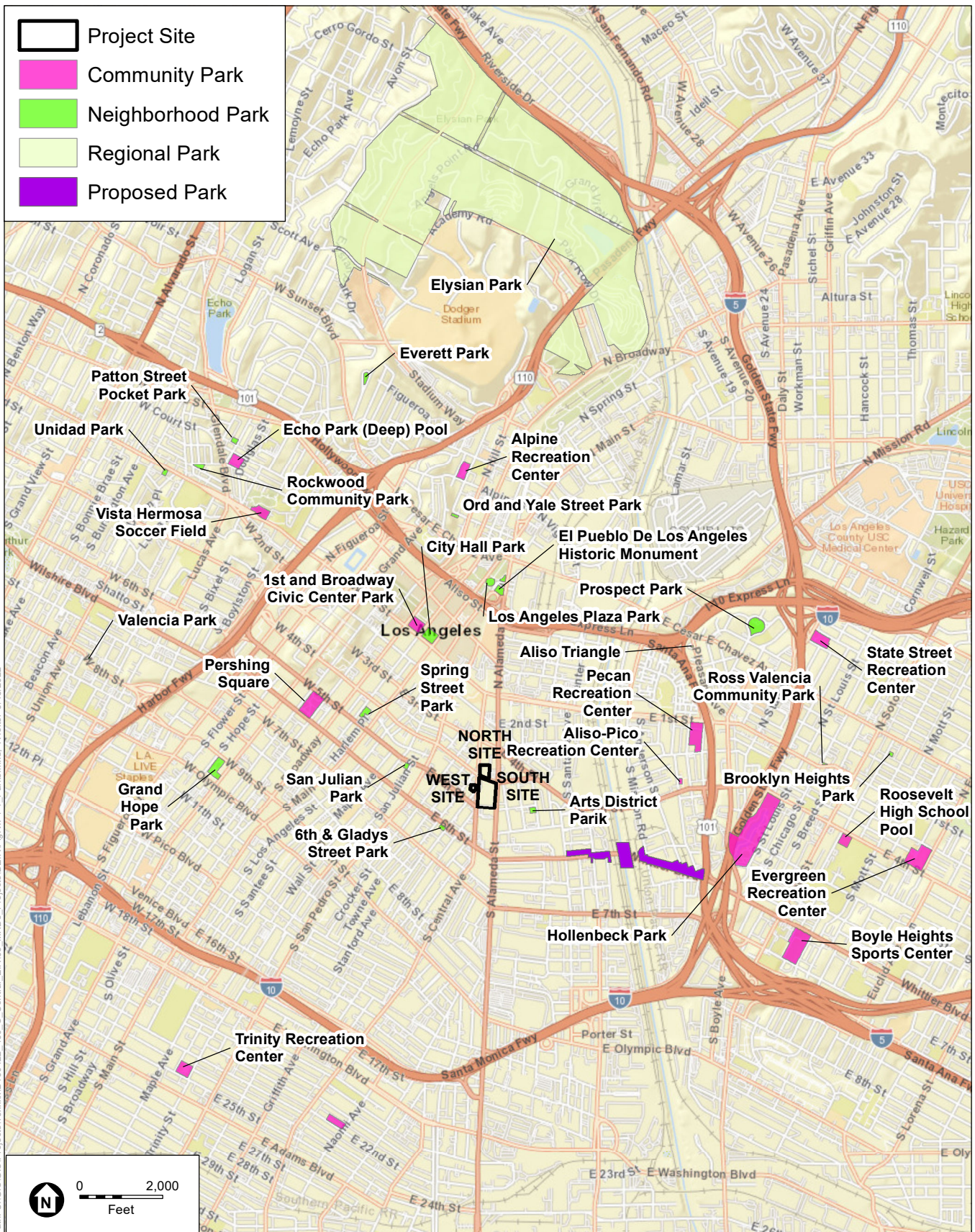
8. Grand Hope Park, located at 900 Hope Street
9. Los Angeles Plaza Park, located at 125 East Paseo De La Plaza
10. Ord and Yale Street Park, located at 516 West Ord Street
11. Patton Street Pocket Park, located at 303-305, 317-327 North Patton Street
12. Prospect Park, located at 612 North Echandia Street
13. Rockwood Community Park, located at 1571 West Rockwood Street
14. Ross Valencia Community Park, located at 2239 East 1st Street
15. San Julian Park, located at 312 East 5th Street
16. Spring Street Park, located at 428 South Spring Street
17. Unidad Park, located at 1644-1648 West Beverly Boulevard
18. Valencia Triangle, located at 1425 West 8th Street

The following RAP facilities are classified as community parks and are located within a 2-mile radius of the Project Site:

1. 1st and Broadway Civic Center Park, located at 217 West 1st Street
2. Aliso Pico Recreation Center, located 370 S. Clarence Street approximately
3. Alpine Recreation Center, located at 817 North Yale Street
4. Boyle Heights Sports Center, located at 933 South Mott Street
5. Central Recreation Center, located at 1357 East 22nd Street
6. Echo Park (Deep) Pool, located at 1419 West Colton Street
7. Evergreen Recreation Center, located at 2839 East 4th Street
8. Hollenbeck Park, located at 415 South St. Louis Street
9. Pecan Recreation Center, located at 127 South Pecan Street
10. Pershing Square, located at 525 South Olive Street
11. Roosevelt High School Pool, located at 456 South Mathews Street
12. State Street Recreation Center, located at 716 North State Street
13. Trinity Recreation Center, located at 2415 South Trinity Street
14. Vista Hermosa Soccer Field, located at 1301 West 1st Street

In addition, Elysian Park, located at 929 West Academy Road, is a regional park located within a 2-mile radius of the Project Site.

The above listed parks are shown in **Figure IV.I.4-1, Parks and Recreational Facilities Located in the Vicinity of the Project Site.**



SOURCE: ESRI 2022 (confirm date), RAP 2022, and https://www.sixthstreetviaduct.org/parc_location

Fourth & Central Project

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

(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, recently opened in mid-2022. 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).

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.⁴ 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.

The proposed Arts District West Park, located on 6th Street between Mateo Street and Santa Fe Avenue, would include landscaped pedestrian corridors, a meadow and areas with trees, a flexible play and performance lawn, as well as a native garden.

The proposed Arts Plaza would be located between the Arts District West Park and the Railway Property west of the Los Angeles River. It is proposed to include gardens, lawn and trees, terraces, and a performance stage. The Arts Plaza would lead to the adjacent existing pedestrian/vehicular tunnel river bikeway, or River Gateway.

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.

⁴ City of Los Angeles Bureau of Engineering, *Sixth Street PARC Project Initial Study*, April 2017, p. 2-1.

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.

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 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. However, if approved and constructed, planned, future open space and park 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, tables, benches, children’s play 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.H, *Population and Housing*, of this Draft EIR, the Project’s 1,521 residential housing units

would result in 3,423 residents on the Project Site.⁶ Based on the PRP's guideline of 2.0 acres per 1,000 persons, the Project's recommended neighborhood recreational sites, as well as community recreational sites, would total 6.8 acres.⁷

As described in detail in Chapter II, *Project Description*, of this Draft EIR, the Project would provide 90,113 sf (2.07 acres) of publicly-accessible open space, consisting of plazas and paseos passing between Central Avenue and Alameda Street and a Central Courtyard in the South Site. Overall, the Project would provide 163,325 sf of usable open space. Of this, 105,218 sf would be outdoor and rooftop common open space. The Project's open space would not meet the recommended 2.0 acres of neighborhood recreation sites per 1,000 persons (6.8 acres for the Project's anticipated population increases of 3,422 residents) and 2.0 acres of community recreational sites per 1,000 persons (6.8 acres for a population of 3,422 residents) 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.

Amenities provided throughout the Project's open space areas would include shade trees, landscaping, dining patios, raised planters, wood benches, umbrellas, cabanas, decking, artificial and natural turf, and a broad range of paver types (circular, pebble, concrete, etc.). The Project's residential open space and amenity features would include rooftop terraces, community gardens, swimming pools, spa areas, common areas with BBQs, kitchen spaces and outdoor seating, meditation and quiet areas, game rooms, a dog walk, plazas, and parks. Given the Project's open space and recreational amenities, the Project's recreational demand would be at least partially accommodated on the proposed Project Site. While these privately owned open spaces are not under the jurisdiction of RAP, 90,113 square feet of open space would be open to the public and, thus, has the potential to reduce Project-related recreational demand on RAP facilities. Likewise, it can be reasonably assumed that residual off-site park usage would likely be dispersed among the neighborhood parks, community parks, and regional park that are within a 2-mile radius of the Project Site, as shown in Figure IV.1-4-1 above.

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

⁶ The generation factors for residents of 3.25 residents per dwelling unit is based on Table 1, Land Use and Trip Generation Base Assumptions, from the City of Los Angeles Vehicle Miles Traveled (VMT) Calculator Documentation, Version 1.3, provided by the Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning.

⁷ $3,423 \text{ residents} / 1,000 \text{ persons} = 3.423 \times 1 \text{ acres} = 3.423 \text{ acres} \times 2 = 6.846 \text{ acres}$

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 private 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. New residential dwelling units which are rented or sold to persons or household of very-low, low, or moderate income may be eligible to receive an affordable housing exemption for the park fee and land dedication requirement (Los Angeles Municipal Code Section 12.33 G). In projects with a mix of market-rate and affordable housing units, only the affordable housing units are eligible to receive this exemption.

The Project would include development of 1,521 residential units on the 7.6-acre (333,602 square-foot) Project Site. The Project does not propose the dedication of any portion of the Project Site to the City for parks and recreational facilities and will be required to pay in lieu fees to satisfy LAMC Section 12.33 requirements.

Private and common open space as required by the LAMC for use by the Project's residents is summarized in Table II-4, *Open Space, Trees, and Landscape Summary*, in Chapter II, *Project Description*, of this Draft EIR. As shown therein, the Project's residential uses per LAMC Section 12.21 G would require 163,325 sf of open space (including private and common open space), which the Project provides. Of this total, the open space would include common outdoor – 105,218 sf; recreation rooms (indoor amenity spaces) – 25,838 sf (16%);⁸ and private open space (balconies) – 32,269 sf (20%). Per LAMC Section 12.21 G, at least 50 percent of the Project's open space must be common open space. The Project's 105,218 sf outdoor and rooftop common open space would meet this LAMC requirement. Also, at least 25 percent of this common open space must be planted with ground cover, shrubs, or trees. The Project would provide a minimum of 26,305 sf of landscaped open space (25 percent), thus meeting the LAMC requirement. Based on above, the Project would comply with the useable open space and landscape requirements of LAMC Section 12.21 G.

⁸ Recreation rooms cannot count for more than 25 percent of the required common open space per LAMC Section 12.21 G 2(a)(4)(i).

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 meet 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.**

(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 parks to the Project Site are the Arts District Park at 501 S. Hewitt Street and the 6th & Gladys Street Park 624 E. 6th Street, both of which are located approximately 0.2 miles to the east and west, respectively, of the Project Site. These parks are not located along major streets that would provide direct access to the Project Site during construction. The distance of these parks 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 the parks 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 3,423 residents, the Project would need to provide approximately two acres each of neighborhood and community recreational sites and facilities per 1,000 residents to meet the PRP's guidelines. As described in detail in Chapter II, *Project Description*, of this Draft EIR, the Project would provide 90,113 sf (2.07 acres) of publicly-accessible open space, consisting of plazas and paseos passing between Central Avenue and Alameda Street and a Central Courtyard in the South Site. Overall, the Project would provide 163,325 sf of usable open space. Of this, 105,218 sf would be outdoor and rooftop common open space. The Project's open space would not meet the recommended 2.0 acres of neighborhood recreation sites per 1,000 persons (6.8 acres for the Project's anticipated population increases of 3,422 residents) and 2.0 acres of community recreational sites per 1,000 persons (6.8 acres for a population of 3,422 residents) 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.

The Project would exceed the LAMC common open space requirement, which requires at least 50 percent of the total open space to be provided as common open space. As stated above, the Project would provide 105,218 sf of common open space.

Although the Project would meet LAMC requirements for open space, it is assumed that some Project residents would still patronize existing public parks and recreational facilities, including use of public park amenities, such as playground, nature trails, picnic areas, 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 90,113 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.**

(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.

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 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, pool decks, 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.

(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 39 related projects that are anticipated to be developed in the Project vicinity. 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 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. As analyzed in Section IV.H, *Population and Housing*, of this Draft EIR, the related projects containing residential components would have the potential to generate a cumulative population increase of 17,245 people. The related projects, including the Project's estimated 3,423 residents, would generate a total of 20,668 residents.

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.**

(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.