

IV. Environmental Impact Analysis

I.4 Public Services—Recreation and Parks

1. Introduction

This section of the Draft EIR addresses the Project's potential impacts on the public parks and recreation facilities administered by the City of Los Angeles (City) Department of Recreation and Parks (DRP). The analysis identifies and describes the existing parks and recreational facilities in the vicinity of the Project Site and focuses on whether existing facilities are sufficient to accommodate the Project. The analysis also evaluates the Project's consistency with applicable City goals and regulatory requirements that address parks and recreation. This analysis is based, in part, on information provided by the DRP, which is included in Appendix K of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) State Level

Section 66477 of the California Government Code, also known as the Quimby Act, was enacted in 1975 in an effort to promote the availability of park and open space areas in California. The Quimby Act authorizes cities and counties to enact ordinances requiring the dedication of land, or the payment of fees for park and/or recreational facilities in lieu thereof, or both, by developers of residential subdivisions as a condition to the approval of a tentative map or parcel map. Within the City of the Los Angeles, the Quimby Act is implemented via Los Angeles Municipal Code (LAMC) Section 17.12, which requires developers of residential subdivisions to set aside and dedicate land for park and recreational uses and/or pay in-lieu fees for park improvements. In addition, LAMC Section 12.33 extends these requirements to all multi-family residential use projects that require a change in zoning. The Quimby Act permits the City to require parkland dedications not to exceed 3 acres of parkland per 1,000 persons residing within a subdivision, and/or in-lieu fee payments for residential development projects.

(2) Local Level

(a) City Charter

The City Charter established the DRP 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 of Los Angeles. The Board of Recreation and Parks Commissioners oversees the DRP.

With regard to the 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.

According to City policies regarding recreation and park facilities (discussed further below), a satisfactory park and recreation system should address standards in three respects: (1) sufficient land area reserved for parks and recreation; (2) appropriate distribution of park and recreation facilities throughout the City; and (3) a full complement of park and recreation facility types (i.e., active and passive recreation for all age groups) to accommodate a wide variety of users. Facilities should be provided at the neighborhood, community, and regional levels.¹

Two sets of policy documents, the Public Recreation Plan (a portion of the Public Facilities and Services Element of the 1980 City of Los Angeles General Plan), and local plans (e.g., Community and Specific Plans), establish planning goals and objectives related to parks, recreational facilities, and open space areas in the City. The Public Recreation Plan provides citywide goals, objectives, and recommendations concerning parks and recreation facilities, while the local plans provide standards for each specific area of the City. The local Community Plan governing the Project Site is the Palms–Mar Vista–Del Rey Community Plan.

(b) Los Angeles General Plan Framework Element and Open Space Element

The City's General Plan Framework Element (adopted in August 2001) includes park and open space policies that address recreational uses throughout the City. Policy 9.23.5 directs the DRP to "[r]e-evaluate the current park standards and develop modified

¹ *City of Los Angeles Public Recreation Plan, a portion of the Public Facilities and Services Element of the City of Los Angeles General Plan. Adopted October 1980 and amended September 2016.*

standards which recognize urban parks, including multi-level facilities, smaller sites, more intense use of land, public/private partnerships and so on.” In addition, Policy 9.23.8 instructs the DRP to “[p]repare an update of the General Plan Public Facilities and Services Element based on the new Los Angeles Department of Recreation and Parks standards by 2005.”

The City’s General Plan Open Space Element was formally initiated pursuant to a Council motion adopted on May 24, 2001 (Council File 96-1358) and is currently undergoing revisions by the Department of City Planning.^{2,3} Until approval of the pending Open Space Element, the DRP is operating under the guidance of the Public Recreation Plan, a portion of the Public Facilities and Services Element of the 1980 City of Los Angeles General Plan. The guidelines of the Public Recreation Plan are described below.

(c) Public Recreation Plan

Originally adopted in 1980 by the Los Angeles City Council and most recently amended in September 2016, the Public Recreation Plan, a component of the City’s General Plan, sets forth recreational guidelines intended to provide a basis for satisfying the needs for City recreational sites. The guidelines are not intended to set an upper limit for the areas of parks, recreational sites or other types of open spaces. Instead, they are intended to provide the City with a flexible and broad range of options on how park expenditures can be spent across the City.

The Public Recreation Plan emphasizes neighborhood, community and regional recreational sites and parks because of their importance to the daily lives of the City’s people. In addition, the Public Recreation Plan elevates the importance of regional parks as community resources for active and passive recreational activity.

As set forth in the Public Recreation Plan, neighborhood recreational sites and facilities should provide spaces and amenities for outdoor and indoor recreational activities. Such facilities should serve residents of all ages and abilities in the immediate neighborhood and should be based on local community preferences and allow for both active and passive recreation. In accordance with the Public Recreation Plan, community recreational sites and facilities should be designed to serve residents of all ages and abilities in several surrounding neighborhoods and typically offer recreational facilities for organized activities in addition to amenities provided for neighborhood sites and facilities.

² City Clerk: City of Los Angeles, <https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnnumber=96-1358>, accessed August 3, 2017.

³ City of Los Angeles Planning Department, *General Plan Structure, Summary of the General Plan Structure*, Spring 2014.

Regional recreational sites and facilities provide specialized recreational facilities that have regional draw. Finally, the Public Recreation Plan states that school playgrounds may supplement local recreational sites.

The Public Recreation Plan's guidelines state that recreational sites and facilities should be provided at a broad range of levels that collectively help communities reach a recommended overall provision of 10 acres of land per 1,000 persons. In addition, the location and allocation of acreage for neighborhood, community, and regional recreational sites and facilities should be determined by the DRP on the basis of the service radius within residential areas throughout the City. The recommended service levels for both neighborhood sites and facilities and community sites and facilities are 2 acres per 1,000 residents. In addition, the recommended service levels for regional recreational sites and facilities are 6 acres per 1,000 residents. The Public Recreation Plan parkland guidelines are Citywide goals and do not constitute requirements for individual development projects.

The City's programs to implement the Public Recreation Plan include the following:

- Continue to include land acquisition for park and recreational purposes as a regular item in the City's Five Year Capital Improvement Program;
- Prepare a priority schedule based on greatest need for acquiring and developing park and recreational sites;
- Seek federal, state and private funds to implement the acquisition and development of parks and recreational facilities;
- Establish policies to facilitate donation of parks to the City;
- Lease or acquire unused abandoned properties suitable for recreational activities;
- Encourage multiple use of public properties such as power line or flood control rights of way, debris basins, reservoir sites, etc., for recreation; and
- Support programs for community buildings/gymnasiums, swimming pools, and tennis courts.

(d) Citywide Community Needs Assessment

In 2009, the DRP completed a Citywide Community Needs Assessment. The Citywide Community Needs Assessment examined current and future recreation needs in the City as a first step in developing a Citywide park master plan and a five-year capital improvement plan. The overall objectives of the Citywide Community Needs Assessment

were to address the need for additional recreation facilities and parkland, identify improvements to facilities to meet current and future demands, prevent future maintenance issues, and offer positive alternatives to an increasingly dense and urbanized population.⁴ The Citywide Community Needs Assessment provides a number of key recommendations to be implemented through a detailed master planning process. These recommendations include, but are not limited to, working with the Department of City Planning to modify the Park and Recreation Site Acquisition and Development Provisions set forth in Section 17.12 of the LAMC and update the Public Recreation Plan, developing an updated pricing and revenue plan to offset capital and operational costs, and implementing a land acquisition strategy involving developer impact agreements based on the standards for open space desired.⁵ Many of these recommendations have subsequently been implemented and are summarized herein.

Based on the Citywide Community Needs Assessment, the expectation as to how far people are willing to travel to parks and recreational facilities has also changed drastically since the time that the Public Recreation Plan was adopted in 1980. Specifically, 63 percent of survey respondents stated that they would travel at least 1 mile to visit a neighborhood park and 38 percent of respondents would travel at least 2 miles. Additionally, 71 percent of respondents would travel at least 2 miles to visit a community park and 37 percent of respondents would travel more than 3 miles to visit a community park. The willingness to travel farther to a park or recreational facility is in part due to the increased accessibility of public transit, as it is now easy and convenient for people to access parks farther than 0.5 mile from their place of residence.⁶

(e) Los Angeles Municipal Code

In September 2016, the City adopted a new Park Fee Ordinance.⁷ 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 Sections 12.21, 12.33, 17.03, 17.12 and 17.58 of the LAMC, deletes Sections 17.07 and 19.01 of the LAMC, and adds Section 19.17 of the LAMC. The Park Fee Ordinance increases Quimby 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

⁴ *Los Angeles Department of Recreation and Parks, Final Report of the Citywide Community Needs Assessment, 2009.*

⁵ *Ibid.*

⁶ *Ibid.*

⁷ *Ordinance No. 184505, approved by City Council on September 7, 2016, signed by the Mayor on September 13, 2016 and published on September 19, 2016.*

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 effective date of the Park Fee Ordinance is January 11, 2017. The Park Fee Ordinance provides that any project that has acquired vested rights under Section 12.26.A.3 of the LAMC prior to the effective date of the Park Fee Ordinance, and/or has an approved vesting tentative map pursuant to Section 17.15 of the LAMC, the application for which has been deemed complete prior to the effective date of the Park Fee Ordinance, shall not be subject to the park fees set forth in the Park Fee Ordinance. The Project's entitlement applications, including its vesting tentative map application, were deemed complete on November 7, 2016, prior to the Park Fee Ordinance becoming effective. As such, the Project is not subject to the park fee provisions of the Park Fee Ordinance. Rather, the Project is subject to the provisions that were in effect at the time the Project was deemed complete. These provisions are summarized below.

Section 12.21-G of the LAMC identifies open space requirements for projects, and defines usable open space for the purpose of meeting the requirements. Usable open space is defined as areas designated for active or passive recreation and may consist of private and/or 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, children's play areas, and sitting areas. A minimum of 25 percent of the common open space area must be planted with ground cover, shrubs, or trees. In addition, indoor recreation amenities cannot constitute more than 25 percent of the total required usable open space. Private open space is defined as an area which is contiguous to and immediately accessible from an individual dwelling unit and which contains a minimum of 50 square feet, of which no more than 50 square feet per dwelling unit is counted toward the total required usable open space. Private open space may not have a dimension of less than six feet in any direction.

Section 12.21-G of the LAMC 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. Usable open space is defined as areas designated for active or passive recreation and may consist of private and/or common areas. Section 12.21-G.2.a of the LAMC also includes specific provisions regarding common open space.

In addition, Section 17.12 of the LAMC, authorized under the Quimby Act, requires developers of residential subdivisions to set aside and dedicate land for park and recreational uses and/or pay in-lieu fees for park improvements. The area of parkland

within a subdivision that is required to be dedicated is determined by the maximum density permitted by the zone within which the development is located. If the developer does not meet the full dedication requirement, fees for park improvements may be paid to the DRP in lieu of the dedication of all or a portion of all the land. The in-lieu fees are calculated per dwelling unit to be constructed based on the zoning of the project site and must be paid prior to the issuance of building permits. These fees are adjusted annually.

Furthermore, Section 17.12 of the LAMC allows recreation areas developed on a project site that are for use by the project's residents to be credited against the project's Quimby Act requirements to dedicate land for park and recreational uses. Recreational areas that qualify under this provision of Section 17.12 include, in part, swimming pools and spas (when the spas are an integral part of a pool complex) and children's play areas with playground equipment comparable in type and quality to those found in City parks. Furthermore, 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 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 park and recreation facilities. In addition, Section 17.12 provides that low intensity development recreation areas (hereafter referred to as "common open space") may be credited against the project's land dedication requirement if approved by the City's Advisory Agency.

In addition, pursuant to LAMC Section 21.10.3(a)(1) (Dwelling Unit Construction Tax), the City imposes a tax of \$200 per dwelling unit on the construction of all new dwelling units and modification of existing dwelling units to be paid to the Department of Building and Safety. These taxes are placed into a "Park and Recreational Sites and Facilities Fund" to be used exclusively for the acquisition and development of park and recreational sites. As provided in LAMC Section 21.10.3(b), if a developer has already paid Quimby/Finn fees and/or dedicated parkland or recreational facilities pursuant to Section 17.12, the required Dwelling Unit Construction Tax is reduced accordingly.

(f) City of Los Angeles Health and Wellness Element/Plan for a Healthy Los Angeles

In March 2015, the City adopted the Plan for a Healthy Los Angeles as the Health and Wellness Element of the General Plan. This plan elevates existing health-oriented policies in the General Plan and, where policy gaps exist, creates new policies to reinforce the City's goal of creating healthy, vibrant communities. With a focus on public health and safety, the plan serves as a guide for addressing quality-of-life issues, such as safe neighborhoods, a clean environment, access to health services, affordable housing, healthy and sustainably produced food, and the opportunity to thrive. This plan identifies new policies and potential programs to create healthier neighborhoods by working toward

seven goals: (1) Los Angeles, a Leader in Health and Equity; (2) A City Built for Health; (3) Bountiful Parks and Open Spaces; (4) Food that Nourishes the Body, Soul, and Environment; (5) An Environment Where Life Thrives; (6) Lifelong Opportunities for Learning and Prosperity; and (7) Safe and Just Neighborhoods.

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

- Increase the number of neighborhood and community parks so that every Community Plan Area strives for 3 acres of neighborhood and community park space per 1,000 residents (excluding regional parks and open spaces).
- Increase access to parks so that 75 percent of all residents are within a 0.25-mile walk of a park or open space facility.
- Increase the number of schools (public, private, and charter) that have shared use agreements for community use outside of normal school hours by 25 percent.
- Increase the miles of the Los Angeles River that are revitalized for natural open space and physical activity, particularly in low-income areas.
- Increase the number of parks that feature or incorporate universally-accessible features.
- Improve the percentage of citywide population meeting physical fitness standards per week so that 50 percent of the population meets physical activity guidelines.

Although this plan includes an objective to reach a standard of 3 acres of neighborhood and community park space per 1,000 residents (excluding regional parks and open space), the DRP is operating under the guidance and standards of the Public Recreation Plan, as previously described.

(g) Palms–Mar Vista–Del Rey Community Plan

As previously noted, the Project Site is located within the Palms–Mar Vista–Del Rey Community Plan area. The Palms–Mar Vista–Del Rey Community Plan, adopted on September 16, 1997, and most recently amended on September 7, 2016, includes the following objectives and policies that are relevant to parks and recreation:

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

- Policy 4-1.1: Preserve and improve the existing recreational facilities and park space.
- Policy 4-1.2: Better utilization and development of recreational facilities at existing parks.
- Objective 4-2: To provide facilities for specialized recreational needs by utilizing existing public lands such as flood control channels, utility easements or Department of Water and Power property.
 - Policy 4-2.1: Flood control channels and other appropriate public lands should be considered for open space and recreational purposes.
- Objective 4-3: To ensure the accessibility, security and safety of parks by their users, particularly families with children and senior citizens.
 - Policy 4-3.1: Ensure that parks are adequately illuminated for safe use at night.
- Objective 5-1: Preserve existing open space resources and where possible develop new open space.
 - Policy 5-1.1: Encourage the retention of passive and visual open space which provides a balance to urban development of the community.

In addition, the Palms–Mar Vista–Del Rey Community Plan recognizes that the provision of public services and other programs point to the complementary relationship that exists between land use and service programs. Accordingly, the Palms–Mar Vista–Del Rey Community Plan identifies the following policies that are relevant to parks and recreation:

- Recreation and Park Facilities Policy 1: Encourage continuing efforts by County, State, and Federal agencies to acquire vacant land for publicly-owned open space.
- Recreation and Park Facilities Policy 2: Ensure that parks are adequately illuminated and secured for safe use at night, as appropriate.
- Recreation and Park Facilities Policy 3: Provide for the supervision of park activities and promote enforcement of codes restricting illegal activity.
- Recreation and Park Facilities Policy 4: Coordinate with the DRP and the Police Department to ensure adequate police patrols and defensible space design.
- Recreation and Park Facilities Policy 5: Improve utilization and development of recreational facilities at existing parks.

- Recreation and Park Facilities Policy 6: Coordinate with City Departments, neighboring cities, and County, State, and federal agencies to utilize existing public lands such as flood control channels, utility easements, and Department of Water and Power properties to provide for such recreational needs as hiking, and biking and equestrian trails.
- Recreation and Park Facilities Policy 7: Plan and design the expansion of existing facilities and the acquisition of new sites to minimize the displacement of housing and the relocation of the residents.
- Recreation and Park Facilities Policy 8: Target Park and Recreation projects in areas with the greatest deficiencies.
- Recreation and Park Facilities Policy 9: Pursue resources to clean up land that could be used for public recreation safely.

The neighborhood and community parkland to population ratio in the Palms–Mar Vista–Del Rey Community Plan area is 0.38 acre per 1,000 residents.⁸ The Citywide neighborhood and community parkland-to-population ratio is 0.84 acre per 1,000 residents.⁹ As described above, the Public Recreation Plan includes a guideline of 2 acres per thousand persons for both neighborhood sites and facilities and community sites and facilities. In addition, the recommended service level for regional recreational sites and facilities is 6 acres per 1,000 residents. Based on the neighborhood and community parkland to population ratio in the Palms–Mar Vista–Del Rey Community Plan area and Citywide, both the Community Plan area and the City are underserved when considering the guidelines provided in the Public Recreation Plan.

b. Existing Conditions

As previously stated, the DRP is responsible for the establishment, operation, and maintenance of parks and recreational facilities within the City. Currently, the DRP maintains and operates more than 400 sites for recreational use including 184 recreation centers, 72 fitness areas, 62 swimming pools and aquatic centers, 30 senior centers, 26 skate parks, 13 golf courses, 12 museums, 9 dog parks, 13 lakes, and hundreds of programs for youth, adults and seniors. The DRP also administers more than 16,000 acres of parkland, which includes Griffith Park, one of the largest municipal parks within the boundaries of any American city.¹⁰

⁸ *Written correspondence from Darry Ford, Assistant General Manager, Department of Recreation and Parks, Planning, Construction and Maintenance Branch, June 30, 2017.*

⁹ *Ibid.*

¹⁰ *Los Angeles Department of Recreation and Parks, Who We Are, www.laparks.org/departments/who-we-are, accessed August 3, 2017.*

Consistent with the *L.A. CEQA Thresholds Guide*, potential impacts to parks and recreational facilities within a 2-mile radius of the Project Site area are evaluated. As shown in Figure IV.I.4-1 on page IV.I.4-12, there are a number of parks and recreational facilities located within an approximate 2-mile radius of the Project Site. Table IV.I.4-1 on page IV.I.4-13 lists the type of park, amenities, and approximate driving distance from the Project Site for these public parks and recreational facilities.

3. Project Impacts

a. Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, the Project would have a significant impact related to recreation and parks 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; or

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

Threshold (c): Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

For this analysis, the Appendix G Thresholds provided above are relied upon. The analysis utilizes 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 L.A. CEQA Thresholds Guide identifies the following criteria to evaluate impacts to parks and recreation:

- The net population increase resulting from the proposed project;
- The demand for recreational 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, and;

LEGEND

- 1 **Glen Alla Park**
4601 Alla Rd., Los Angeles, CA 90292
- 2 **Venice High School Indoor Pool**
2490 Walgrove Ave., Los Angeles, CA 90066
- 3 **Triangle Park**
Oxford Ave. & Marr St., Venice, CA 90291
- 4 **Oakwood Recreation Center**
767 California Ave., Venice, CA 90291
- 5 **Canal Park**
200 Linnie Canal, Venice, CA 90291
- 6 **Penmar Recreation Center**
1341 Lake St., Venice, CA 90291
- 7 **Penmar Golf Course**
1233 Rose Ave., Venice, CA 90291
- 8 **Titmouse Park**
415 Culver Blvd., Playa Del Rey, CA 90293
- 9 **Del Rey Lagoon**
6660 Esplanade Place, Playa Del Rey, CA 90293
- 10 **Venice Beach Recreation Center & Boardwalk**
1800 Ocean Front Walk, Venice, CA 90291
- 11 **Venice Reservoir Site**
3224 S Centinela Ave., Los Angeles, CA 90066
- 12 **Westminster Dog Park**
1234 Pacific Ave., Venice, CA 90291
- 13 **Culver Slauson Recreation Center**
5072 S. Slauson Ave., Culver City, CA 90230

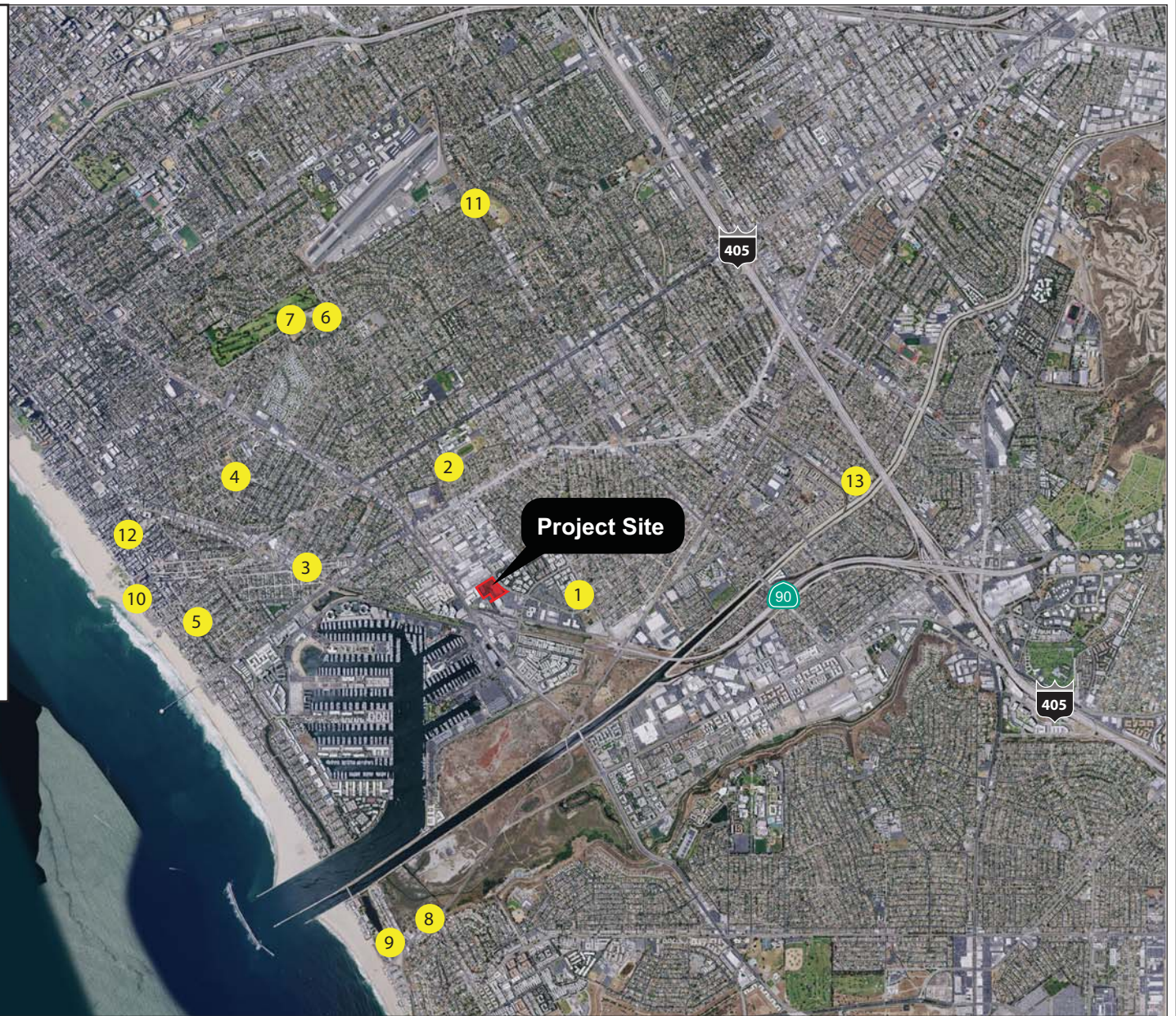


Figure IV.I.4-1

Parks and Recreational Facilities Within a 2-mile Radius of the Project Site

**Table IV.I.4-1
Parks and Recreational Facilities Within a 2-Mile Radius of the Project Site**

Map No.^a	Facility and Address	Distance from Project Site^b (miles)	Type of Park/ Recreational Facilities	Amenities
1	Glen Alla Park 4601 Alla Rd. Los Angeles, CA 90292	0.52	Park	Playground, Picnic Tables, Basketball Courts
2	Venice High School Indoor Pool 2490 Walgrove Ave. Los Angeles, CA 90066	0.66	Year Round Pool	Swimming Sports, Lifeguard Training, Lap Swimming
3	Triangle Park Oxford Ave. & Marr St. Venice, CA 90291	0.94	Park	Basketball Courts, Play Area
4	Oakwood Recreation Center 767 California Ave. Venice, CA 90291	1.48	Recreation Center	Baseball, Basketball, Soccer, After School Programs, Arts Programs, Seasonal Camps, Computer Lab, Community Room
5	Canal Park 200 Linnie Canal Venice, CA 90291	1.53	Park	Children's Play Area, Pond
6	Penmar Recreation Center 1341 Lake St. Venice, CA 90291	1.68	Recreation Center	Baseball, Basketball, Soccer, Seasonal Day Camp, Pre-School, After School Club, Children's Play Area, Kitchen, Gymnasium
7	Penmar Golf Course 1233 Rose Ave. Venice, CA 90291	1.69	Golf Course	Golf
8	Titmouse Park 415 Culver Blvd. Playa Del Rey, CA 90293	1.75	Park	Benches
9	Del Rey Lagoon 6660 Esplanade Place Playa Del Rey, CA 90293	1.85	Park, Lake, Aquatic	Baseball, Basketball, Lagoon
10	Venice Beach Recreation Center & Boardwalk 1800 Ocean Front Walk Venice, CA 90291	1.88	Beach	Basketball, Weightlifting, Bike Path, Children's Play Areas, Pier, Handball, Paddle Tennis, Gymnastics, Skate Park
11	Venice Reservoir Site 3224 S Centinela Ave. Los Angeles, CA 90066	1.90	Park	Baseball, Picnic Area

Table IV.I.4-1 (Continued)
Parks and Recreational Facilities Within a 2-Mile Radius of the Project Site

Map No.^a	Facility and Address	Distance from Project Site^b (miles)	Type of Park/ Recreational Facilities	Amenities
12	Westminster Dog Park 1234 Pacific Ave. Venice, CA 90291	1.95	Dog Park	Dog Park
13	Culver Slauson Recreation Center 5072 S. Slauson Ave. Culver City, CA 90230	1.99	Recreation Center	Youth Sports Programs, Picnic Areas, Basketball, Bike Path, Outdoor Fitness Equipment, Tetherball
<p>^a Map numbers correspond with Figure IV.I.4-1 on page IV.I.4-12.</p> <p>^b Distances are approximate driving distances from Project Site.</p> <p>Source: Eyestone Environmental, 2017; City of Los Angeles, Department of Recreation and Parks Facility Locator, www.laparks.org, accessed August 3, 2017.</p>				

- Whether the project includes features that would reduce the demand for recreational and park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).
- Based on the above factors, the Project would have a significant impact on parks and recreational services if:
 - The Project would generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services; or
 - Project construction would interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project Site area.

b. Methodology

The methodology used to evaluate potential park and recreation impacts included the following: (1) reviewing the existing parks and recreational facilities in the vicinity of the Project Site; (2) projecting the future population associated with the Project; and (3) evaluating the demand for park and recreation service anticipated at the time of buildout of the Project compared to the expected level of service available, considering both DRP facilities, as well as the Project's recreational amenities. The analysis also considers whether the Project would conflict with the parks and recreation standards set forth in

regulatory documents (i.e., the Quimby Act, the LAMC, and the General Plan including the Public Recreation Plan).

c. Analysis of Project Impacts

(1) Project Design Features

No specific project design features beyond the open space and recreation features described in Section II, Project Description, of this Draft EIR are proposed with regard to parks and recreation.

(2) 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?

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

Threshold (c): Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

(a) Impacts on Existing Facilities

(i) Construction

As provided above, the thresholds of significance primarily consider whether a project would increase the population in the area thereby resulting in an associated increase in 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. Given the temporary nature of construction activities, construction of a project would not introduce a permanent population to an area which could result in an increase in the use of existing parks and recreational facilities. Accordingly, while construction of the Project would result in a temporary increase in the number of construction workers at the Project Site, due to the temporary nature of construction activities, the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on the construction of the Project is negligible. Therefore,

the construction workers associated with the Project would not result in a notable increase in the residential population within the vicinity of the Project Site, which would result in a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

Additionally, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. Construction workers also typically spend their breaks at or in the immediate vicinity of the Project Site. While there is a potential for construction workers to seek a nearby park to spend their lunch breaks, any resulting increase in the use of that park would be negligible.

As discussed in Section II, Project Description, of this Draft EIR, it is anticipated that the primary haul routes to and from the Project Site would be via Glencoe Avenue, Lincoln Boulevard, and SR-90. As shown in Figure IV.I.4-1 on page IV.I.4-12, there are no parks or recreational facilities located adjacent to the proposed haul routes or adjacent to the Project Site such that access to those facilities would be impaired during construction of the Project. Therefore, use of haul routes would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site.

Based on the above, construction of the Project would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services, nor would construction of the Project interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the vicinity of the Project Site. **Therefore, construction of the Project would not increase the use of existing parks or recreational facilities such that substantial physical deterioration of the facility would occur nor would the Project require new or expanded parks or recreational facilities which might have an adverse physical effect on the environment. Impacts on parks and recreational facilities during construction of the Project would be less than significant, and mitigation measures would not be required.**

(ii) Operation

As discussed in detail in Section II, Project Description, of this Draft EIR, the Project would include 658 multi-family residential units and 27,300 square feet of neighborhood-serving commercial uses, including approximately 13,650 square feet of retail space and approximately 13,650 square feet of restaurant space. The Project's residential units

would introduce an estimated 1,599 new residents.¹¹ The population increase associated with the Project would generate additional demand for parks and recreational facilities in the vicinity of the Project Site.

As discussed in Section II, Project Description, of this Draft EIR, the Project would provide a variety of open space and recreational amenities to comply with the LAMC requirements. In particular, the Project would feature a landscaped public plaza at the northwest corner of the Project Site, along Maxella Avenue, that would connect to a landscaped pedestrian paseo. The pedestrian paseo would extend south to a proposed publicly accessible, privately maintained open space area that would be provided near the southwest corner of the Project Site. In addition, each of the three buildings would feature a landscaped podium on the third level with recreational amenities available to Project residents and guests of residents. These amenities include balconies, paved plazas with seating, landscaped paseos, courtyard areas, pools, a spa, fire pits, and outdoor kitchens with lounges and seating areas.

As shown in Table IV.I.4-2 on page IV.I.4-18, the Project would provide a total of approximately 70,175 square feet of open space, equivalent to approximately 1.6 acres.

Due to the amount, variety, and availability of the proposed open space and recreational amenities, it is anticipated that Project residents would generally utilize on-site open space to meet their recreational needs. Thus, while the Project's residents would be expected to utilize off-site public parks and recreational facilities to some degree, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Similarly, while the Project's commercial component could result in a demand for parks and recreational facilities, as discussed above, the Project also includes common open space areas throughout the Project Site, some of which would be publicly accessible and available for use by other users of the Project Site. Furthermore, as discussed below, the Project would pay in lieu fees in accordance with Section 17.12 of the LAMC, the City's parkland dedication ordinance enacted under the Quimby Act. As noted above, in September 2016, the City adopted a new Park Fee Ordinance. The Park Fee Ordinance amends Sections 12.21, 12.33, 17.03, 17.12 and 17.58 of the LAMC, deletes Sections 17.07 and 19.01 of the LAMC, and adds Section 19.17 of the LAMC. The Project's entitlement applications, including its vesting tentative map application, were deemed complete on November 7, 2016, prior to the Park Fee Ordinance becoming effective. As such, the Project is not subject to the park fee provisions of the Park Fee

¹¹ Based on a rate of 2.43 persons per household for multi-family units, based on the 2016 American Community Survey 5-Year Average Estimates (2012-2016) per correspondence with Jack Tsao, Research Analyst II, Los Angeles Department of City Planning, March 22, 2018.

Table IV.I.4-2
Section 12.21-G LAMC—Open Space Required and Provided by the Project

Dwelling Type	Quantity	Open Space Requirement	Total Open Space Required
Residential Apartments			
Studio	97 du	100 sf per unit	9,700 sf
1BR/1BA	386 du	100 sf per unit	38,600 sf
2BR	175 du	125 sf per unit	21,875 sf
<i>Residential Apartments Total</i>	658 du		<i>70,175 sf</i>
Total Open Space Required			70,175 sf
Open Space Proposed		Total Open Space	
Proposed Common Open Space			
Roof Decks		4,500 sf	
Courtyards and Paseo		39,355 sf	
Total Common Open Space Proposed		43,855 sf	
Proposed Private Open Space (balconies)		26,320 sf	
Total Open Space Proposed		70,175 sf	
<i>du = dwelling units</i>			
<i>sf = square feet</i>			
<i>Source: TCA Architects, 2017.</i>			

Ordinance. Rather, the Project is subject to the provisions that were in effect at the time the Project was deemed complete. Overall, operation of the Project would not substantially increase the demand for off-site public parks and recreational facilities such that substantial physical deterioration of the facility would occur nor would the Project require new or expanded parks or recreational facilities which might have an adverse physical effect on the environment.

(b) Regulatory Framework

(i) Public Recreation Plan

As discussed above, the Public Recreation Plan's recommended service levels for both neighborhood sites and facilities and community sites and facilities are 2 acres per 1,000 residents. In addition, the recommended service levels for regional recreational sites and facilities is 6 acres per 1,000 residents. As stated above, the Palms–Mar Vista–Del Rey Community Plan area currently does not meet the Public Recreation Plan's guidelines. However, as previously indicated, these guidelines are Citywide goals and are not intended to be requirements for individual development projects. Furthermore, as described above in Section 2.a.(2)(d), the Citywide Community Needs Assessment states that since the time

that the Public Recreation Plan was adopted in 1980, the distance many people are willing to travel to parks and recreational facilities has increased substantially.

Based on the estimated 1,599 residents that would be generated by the Project, the Project would need to provide approximately 3.2 acres of neighborhood sites and facilities to meet the Public Recreation Plan's guideline of 2 acres per 1,000 residents. Similarly, the Project would need to provide approximately 3.2 acres of community sites and facilities to meet the Public Recreation Plan's guideline for community parks of 2 acres per 1,000 residents. Therefore, the Project would need to provide a total of approximately 6.4 acres in order to meet the Public Recreation Plan's combined guidelines for neighborhood sites and facilities and community sites and facilities. Furthermore, the Project would need to provide approximately 9.64 acres of regional recreational sites and facilities to meet the Public Recreation Plan's guideline of 6 acres per 1,000 residents.

The Project would include approximately 70,175 square feet (approximately 1.6 acres) of total open space areas, including approximately 43,855 square feet of common open space, some of which would be publicly accessible open space, and approximately 26,320 square feet of private open space, which would consist of a variety of open space features and recreational amenities. Therefore, the Project's open space would fall short of the Public Recreation Plan's guidelines for neighborhood sites and facilities, community sites and facilities, and regional recreational sites and facilities. However, as previously stated, the Public Recreation Plan parkland guidelines are Citywide goals and do not constitute requirements for individual development projects. Nonetheless, the approximately 1.6 acres of open space within the Project Site would provide a significant contribution to neighborhood and community park sites and facilities in the vicinity of the Project Site. Furthermore, compliance with regulatory requirements would ensure that the intent of the Public Recreation Plan's parkland guidelines would be met through compliance with State law as enforced through applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces. Such requirements include the provision of on-site open space, and payment of Quimby Fees.

(ii) Los Angeles Municipal Code

As discussed above, a new Park Fee Ordinance became effective on January 11, 2017. However, as the Project's entitlement applications, including its vesting tentative tract map application, were deemed complete on November 7, 2016, it is not subject to the new park fee provisions of the Park Fee Ordinance and is instead subject to the LAMC provisions that were in effect when the Project was deemed complete. An evaluation of the Project's consistency with these provisions is provided below.

As described above, Section 12.21-G of the LAMC requires that residential developments containing six or more dwelling units on a lot provide a minimum square

footage of usable open space per dwelling unit. Based on the proposed dwelling unit types, the Project would be required to provide a total of 70,125 square feet of usable open space. The Project would provide a total of approximately 70,125 square feet of usable open space as shown in Table IV.I.4-2 on page IV.I.4-18. Thus, the Project would meet the LAMC's requirements for the provision of usable open space. Section 12.21-G of the LAMC also requires that residential developments such as the Project plant a minimum of 25 percent of the common open space area with ground cover, shrubs, or trees. The Project would provide 11,000 square feet of planted common open space to meet the LAMC's requirement.

As previously stated, Section 17.12 of the LAMC, the City's parkland dedication ordinance enacted under the Quimby Act, provides a formula for satisfying residential subdivisions' demand for park and recreational space through parkland dedication, payment of in-lieu fees, and/or provision of on-site open space, subject to determination by the Advisory Agency. The guarantee of payment of fees is to be to the satisfaction of the Department of Recreation and Parks. As the Project requires approval of a Zone Change/Height District Change, LAMC Sections 17.12 and 12.33 would require that approximately 32 percent of the lot area be dedicated as parkland based on the Project's proposed density of over 100 dwelling units per acre. Thus, the Project would be required to dedicate a minimum of 32 percent of the Project Site as parkland, or pay in-lieu fees. Although the Project would not include dedicated parkland, as stated above, Section 17.12 provides that the Project would be required to pay in-lieu fees as determined by the City, or may have some or all of its common open space credited against its land dedication requirement if approved by the Advisory Agency. Through one or a combination of these methods, as determined by the City, parkland dedication impacts with regard to compliance with Sections 17.12 and 12.33 of the LAMC would be less than significant.

(iii) Palms–Mar Vista–Del Rey Community Plan

The majority of the objectives and policies of the Palms–Mar Vista–Del Rey Community Plan regarding parks and recreation identified above in Section 2.(2)(f), are applicable to the City, and not to individual development projects. However, part of Objective 5-1 regarding development of new open space where possible would apply to the Project. The Project would support Objective 5-1 as well as the overall objective of the Palms–Mar Vista–Del Rey Community Plan to increase the amount of open space through the provision of on-site open space, recreational amenities, and landscaping. This provision of on-site open space would offset the demand that would be generated by the Project for public parks and recreational facilities in the Palms–Mar Vista–Del Rey Community Plan area. In addition, the Project could be required to pay in-lieu fees in compliance with Section 17.12 and Section 12.33 of the LAMC, the City's parkland dedication ordinance enacted under the Quimby Act, to reduce impacts on park facilities to a less-than-significant level. Therefore, Project development would not diminish the quality

or accessibility or result in the removal of existing parks or recreational facilities in the Community Plan area. As such, the Project would not conflict with the open space policies of the Palms–Mar Vista–Del Rey Community Plan, and impacts with respect to consistency with the Palms–Mar Vista–Del Rey Community Plan would be less than significant.

(c) Conclusion

In determining the Project's potential impacts to parks and recreational facilities, this analysis evaluates the potential demand of the Project for public parks and recreational facilities, as well as the Project's consistency with applicable plans, policies, and regulations related to parks and recreational facilities. As discussed above, construction of the Project would not interfere with existing park usage. In addition, due to the amount, variety, and availability of the Project's proposed open space and recreational amenities, it is anticipated that Project residents, visitors and employees would generally utilize on-site open space to meet their recreational needs. Furthermore, the Project would meet the applicable requirements set forth in Sections 12.21, 12.33, and 17.12 of the LAMC regarding the provision of useable open space and the payment of fees. While the Project would not meet the parkland provision goals set forth in the Public Recreation Plan, these are Citywide goals and are not intended to be requirements for individual development projects. Additionally, implementation of existing regulatory requirements would ensure that the intent of the Public Recreation Plan's parkland guidelines would be met through the applicable LAMC requirements referenced above related to the provision and funding of parks and recreational spaces. **Thus, the Project would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services, nor would the Project interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project Site area. Therefore, operation of the Project would not increase the use of existing parks or recreational facilities such that substantial physical deterioration of the facility would occur nor would the Project require new or expanded parks or recreational facilities which might have an adverse physical effect on the environment. Impacts to parks and recreational facilities during operation of the Project would be less than significant, and no mitigation measures are required.**

d. Cumulative Impacts

Cumulative growth in the vicinity of the Project Site includes specific known development projects as well as general ambient growth projected to occur, as described in Section III, Environmental Setting, of this Draft EIR. A number of identified related projects fall within a 2-mile radius of the Project Site, the geographic area analyzed for purposes of assessing impacts to parks and recreational facilities. As noted above, the Palms–Mar Vista–Del Rey Community Plan area is currently underserved when considering the

desired parkland guidelines provided in the Public Recreation Plan. As the population continues to grow in the vicinity of the Project Site, increased demand would lower the existing parkland to population ratio if new facilities are not constructed.

As discussed above, while it is anticipated that the Project's provision of on-site open space would meet the recreational needs of Project residents, the Project would not meet all of the parkland provision goals set forth in the Public Recreation Plan. Development of the related projects would exacerbate the Community Plan Area's deficiency in parkland per the Public Recreation Plan's guidelines. However, as previously indicated, the guidelines set forth in the Public Recreation Plan are Citywide goals and are not intended to be requirements for individual development projects. Furthermore, as with the Project, the related projects would undergo discretionary review on a case-by-case basis and would be expected to coordinate with the DRP regarding the provision of open space. **Future development projects would also be required to comply with the park and recreation requirements of Sections 12.21, 17.12, and 12.33 of the LAMC, as applicable. Compliance with those requirements would mitigate potential impacts to park and recreational facilities associated with the construction and operation of related projects such that substantial physical deterioration of the facility would not occur, nor require new or expanded parks or recreational facilities which might have an adverse physical effect on the environment. As such, cumulative impacts to parks and recreational facilities would be less than significant.**

e. Mitigation Measures

Project-level and cumulative impacts with regard to parks and recreation would be less than significant. Therefore, no mitigation measures are required.

f. Level of Significance After Mitigation

Project-level and cumulative impacts related to parks and recreation would be less than significant.