

IV. Environmental Impact Analysis

I.5 Public Services—Parks and Recreation

1. Introduction

This section of the Draft EIR addresses the Project's potential impacts on public parks and recreation facilities administered by the City of Los Angeles Department of Recreation and Parks (DRP). The analysis identifies and describes the existing parks and recreational facilities in the Project vicinity and determines whether existing facilities are sufficient to accommodate the growth potentially generated by the Project. The analysis also evaluates the Project's consistency with applicable City goals and regulatory requirements pertaining to 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

(a) Quimby Act

The Quimby Act, codified in Government Code Section 66477(a)(2), was enacted in 1965 as an effort to promote the availability of park and recreation areas in California and respond to the increased rate of urbanization and need for open space. 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 a parcel map. Thus, Los Angeles Municipal Code (LAMC) Sections 12.33 and 17.12, as further discussed below, were authorized pursuant to the Quimby Act. The Quimby Act establishes a maximum parkland dedication standard of 3 acres of parkland per 1,000 residents for new subdivision development and/or in-lieu fee payments for residential development projects.

(2) Local

(a) City of Los Angeles Charter

Section 500 of the City of Los Angeles 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 control and management of recreation and park lands, City of Los Angeles Charter Section 594(c) provides that all lands set apart or dedicated as a public park shall forever remain for the use of the public inviolate. However, the Board of Recreation and Parks Commissioners may authorize the use of those lands for any park purpose and for other specified purposes.

(b) City of Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire City of Los Angeles and defines citywide policies regarding land use, including park and open space policies that address recreational uses throughout the City. Policy 9.23.5 of the Framework Element's Infrastructure and Public Services Chapter directs the DRP to "[r]e-evaluate the current park standards and develop modified standards which recognize urban parks, including multi-level facilities, smaller sites, more intense use of land, public/private partnerships and so on." In addition, Policy 9.23.8 instructs the 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."

(c) City of Los Angeles Open Space Element

The City's General Plan Open Space Element was prepared in June 1973 to provide an official guide for the identification, preservation, conservation, and acquisition of open space in the City.¹ 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, the Element discusses the acquisition and use of public owned lands and recommends further

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

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.²

The 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.^{3,4} During April through June 2017, the Department of City Planning convened four meetings for an Open Space Working Group for OurLA2040, the City's update to the General Plan. This group included open space practitioners that focused on four topics: Parks and Recreation, Wildlands, Waterways and Beaches, and Connections. As the update to the Open Space Element is underway, key preliminary themes have since been identified:⁵

- Create a network of interconnected urban open spaces and green infrastructure
- Capitalize on opportunities to repurpose existing land for parks
- Strategically invest in improving equity and access to parks
- Promote citizen education, involvement, and stewardship
- Identify opportunities for climate-smart open space investments that deliver multiple environmental benefits

In conjunction with the working group meetings, an Open Space Vision Survey has been released to the public and will provide feedback that will be incorporated into the guiding principles for the Open Space Element. The OurLA2040 group hosted a series of community workshops in late 2017 and early 2018.⁶

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

³ City of Los Angeles, Office of the City Clerk, Council File Number: 96-1358, <https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=96-1358>, accessed April 5, 2018.

⁴ City of Los Angeles Department of City Planning, *General Plan Structure, Summary of the General Plan Structure*, Spring 2014.

⁵ City of Los Angeles Department of City Planning, *Our LA2040, City of Los Angeles' General Plan Update, Open Space Working Group Summary*, August 2017.

⁶ City of Los Angeles Department of City Planning, *OurLA2040, Community Conversations—What We've Heard So Far*, www.ourla2040.org/community-conversations-what-weve-heard-so-far, accessed August 4, 2018.

Until approval of the pending updates to the 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.⁷ The guidelines of the Public Recreation Plan are described below.

(d) City of Los Angeles Service Systems Element/Public Recreation Plan

The City's General Plan Service Systems Element/Public Recreation Plan (Public Recreation Plan), originally adopted in 1980 and recently amended in September 2016, sets forth recreational guidelines intended to provide a basis for satisfying the needs for City recreational sites.⁸ 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.

According to the standard park characteristics identified in the Public Recreation Plan, park facilities are discussed in terms of local parks and regional facilities and their accessibility and service to residents. Local parks include neighborhood and community recreation sites, open space, and "small" parks, which are usually characterized as less than 1 acre in size. 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. Although the ideal size for a neighborhood park is considered to be 10 acres, such parks within the City of Los Angeles are typically 1 to 5 acres in size.

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

⁷ Email communication, Melinda M. Gejer, City Planning Associate, Planning, Construction and Maintenance Branch, Department of Recreation and Parks, October 24, 2017.

⁸ Office of the City Clerk, City of Los Angeles, Council File Number: 16-0529, https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=vcfi.dsp_CFMS_Report&rptid=99&cfnumber=16-0529, accessed August 5, 2018.

in addition to amenities provided for neighborhood sites and facilities. According to the Public Recreation Plan, the ideal size for a community park is considered to be 15 to 20 acres. 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 also 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 desired long-range standard for both neighborhood sites and facilities and community sites and facilities is 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.

(e) *Citywide Community Needs Assessment*

In 2009, the DRP completed a Citywide Community Needs Assessment (Assessment). The 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 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.⁹ The 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 LAMC Section 17.12 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.¹⁰

Based on the Assessment, the expectation of people's willingness 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.¹¹

(f) *City of Los Angeles Health and Wellness Element/Plan for a Healthy Los Angeles*¹²

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

⁹ *Los Angeles Department of Recreation and Parks, Final Report of the Citywide Community Needs Assessment, 2009.*

¹⁰ *Los Angeles Department of Recreation and Parks, Final Report of the Citywide Community Needs Assessment, 2009.*

¹¹ *Los Angeles Department of Recreation and Parks, Final Report of the Citywide Community Needs Assessment, 2009.*

¹² *City of Los Angeles Department of City Planning, Plan for a Healthy Los Angeles, March 2015.*

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, previously described.¹³

¹³ *Email communication, Melinda M. Gejer, City Planning Associate, Planning, Construction and Maintenance Branch, Department of Recreation and Parks, October 24, 2017.*

(g) *Los Angeles Municipal Code*

In September 2016, the City adopted a new Park Fee Ordinance (Ordinance).¹⁴ The aim of the 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 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 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 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 Ordinance is January 11, 2017. The Ordinance provides that any project that has acquired vested rights under LAMC Section 12.26.A.3 prior to the effective date of the Ordinance, and/or has an approved vesting tentative map pursuant to LAMC Section 17.15, the application for which has been deemed complete prior to the effect date of the Ordinance, shall not be subject to the park fees set forth in the Ordinance. The Project's entitlement applications, including its vesting tentative map application, were deemed complete by the Department of City Planning on October 20, 2016, prior to the Ordinance becoming effective. As such, the Project is not subject to the new park fee provisions of the Ordinance. Rather, the Project is subject to the provisions that were in effect at the time the Project's applications were deemed complete. These provisions are summarized below.

LAMC Section 12.21.G 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 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.

¹⁴ *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.*

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.

In addition, the former LAMC Section 17.12, authorized under the Quimby Act (which is the version of Section 17.12 that applies to the Project), 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. Alternately, fees for park improvements may be paid to the DRP in lieu of the dedication of all or a portion of 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. Pursuant to LAMC Section 12.22 and the vesting provisions in LAMC Section 17.15.C.1, the DRP recommends that the Quimby Fee be based on the C2 zone.¹⁵

Further, the former provisions of LAMC Section 17.12 applicable to the Project (i.e., those in effect when the applications were deemed complete), allow recreation areas developed on a project site that are for use by the project's residents to be credited against the project's land dedication requirements. Recreational areas that qualify under those provisions 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, former Section 17.12 provides that low intensity development recreation areas (hereafter referred to a "common open space") may be credited against the project's land dedication requirement, if approved by the City's Advisory Agency.

Similar to former Section 17.12 described above, former LAMC Section 12.33 requires a developer of multiple residential uses not involving a subdivision, for which a zone change is required, to dedicate land for park and recreational uses and/or pay in-lieu

¹⁵ *Written correspondence from Ramon Barajas, Assistant General Manager, Executive Office, Department of Recreation and Parks, May 8, 2017.*

fees for park improvements. These fees (also known as Finn fees), are subject to the same restrictions, conditions, exemptions, and credits as under former Section 17.12.

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 LAMC Sections 17.12 or 12.33, the Dwelling Unit Construction Tax required is reduced accordingly.

(h) Central City Community Plan

As discussed in Section IV.F, Land Use, of this Draft EIR, the Project Site is located within the planning boundary of the Central City Community Plan (Community Plan), which was last updated in January 2003. The adopted Community Plan includes the following objectives and policies that are relevant to parks and recreation:¹⁶

- Objective 4-1: To encourage the expansion and additions of open spaces as opportunities arise.
- Policy 4-1.1: Review existing open space standards in order to expand the range of potential open space resources at the neighborhood and community levels.
- 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 system.
- 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.
- Policy 4-3.1: Review existing park and recreational space usage in order to determine factors impacting low use of certain facilities.

¹⁶ *The Central City Community Plan is in the process of being updated. Refer to Section III, Environmental Setting, and Section IV.F, Land Use, of this Draft EIR for further discussion.*

- 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.

In the Central City Community Plan area, the neighborhood and community parkland to population ratio is 0.10 acre per 1,000 residents.¹⁷ The Citywide neighborhood and community parkland to population ratio is currently 0.76 acre per 1,000 residents.¹⁸ Thus, the Central City Community Plan area has a lower parkland-to-population ratio compared to the Citywide average. As described above, the Public Recreation Plan includes a guideline of 2 acres per 1,000 persons for both neighborhood and community sites and facilities. 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 Central City Community Plan area, both the Community Plan area and the City are underserved when considering the guidelines in the Public Recreation Plan.

b. Existing Conditions

(1) Local Area

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, nine dog parks, 13 lakes, and hundreds of programs for youth, adults and seniors. The DRP also administers more than 16,000 acres of parkland, including Griffith Park, one of the largest municipal parks within the boundaries of an American city.¹⁹

¹⁷ *Written correspondence from Darryl Ford, Senior Management Analyst I, Planning, Maintenance, and Construction Branch, Department of Recreation and Parks, April 11, 2017.*

¹⁸ *Written correspondence from Darryl Ford, Senior Management Analyst I, Planning, Maintenance, and Construction Branch, Department of Recreation and Parks, April 11, 2017.*

¹⁹ *Los Angeles Department of Recreation and Parks, Who We Are, www.laparks.org/department/who-we-are, accessed August 5, 2018.*

While there are no regional parks within the Central City Community Plan area, the closest City regional park to the Project Site is Elysian Park located at 925 Academy Road, approximately 2.17 miles north of the Project Site. The approximately 600-acre Elysian Park offers bike paths, hiking trails, horseshoe pits, and jogging paths. The next closest regional parks are Ernest E. Debs Regional Park, located at 4235 Monterey Road, approximately 4 miles northeast of the Project Site, and Griffith Park, located at 4730 Crystal Springs Drive, approximately 5 miles northwest of the Project Site. The 282-acre Ernest E. Debs Regional Park offers trails in an urban wilderness preservation area, community and gathering areas, ballfields, and a nature center managed by the Audubon Society.^{20,21} The 4,210-acre Griffith Park, the largest municipal park with an urban wilderness area in the United States, offers numerous family attractions, an assortment of educational and cultural institutions, and miles of hiking and horseback riding trails.²² Although these three parks are located beyond the Central City Community Plan area, the recreational space and amenities offered by these parks likely attract Central City residents as well.

In addition, two parks are located within the Central City Community Plan area but are not operated by the DRP, including Grand Park and the Los Angeles State Historic Park. Grand Park is located at 200 North Grand Avenue, approximately 0.19 mile north of the Project Site. Operated by Los Angeles County's Music Center, Grand Park offers 12 acres of park and recreational space for gatherings, entertainment, and leisure activities that likely attract Central City residents.²³ The Los Angeles State Historic Park is located at 1245 North Spring Street, approximately 1.14 miles northeast of the Project Site. Operated by California State Parks, the 32-acre Los Angeles State Historic Park provides pedestrian walkways, bike paths, landscaped areas, event space, and open space for the public to enjoy.²⁴ As such, Central City residents have the opportunity to frequent this State Park as well. 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 it is anticipated that patrons of parks and recreational facilities in the Project vicinity would reside within that distance. As shown in Figure IV.1.5-1 on page IV.1.5-13, there are a number of parks and recreational facilities located within an approximate 2-mile radius of the Project Site. Table IV.1.5-1 on page IV.1.5-14 lists the type of park, amenities, and

²⁰ *Debs Park Advisory Board, Framework Plan, Introduction*, www.debspark.org/framework1.html, accessed August 5, 2018.

²¹ *Audubon Center at Debs Park, Visit Our Center*, <http://debspark.audubon.org/visit>, accessed August 5, 2018.

²² *City of Los Angeles Department of Recreation and Parks, Griffith Park, General Information*, www.laparks.org/griffithpark/general-information, accessed August 5, 2018.

²³ *County of Los Angeles, Grand Park FAQs*, <https://grandparkla.org/faqs/>, accessed August 5, 2018.

²⁴ *Los Angeles State Historic Park, Our Story*, <http://lashp.com/our-story/>, accessed August 5, 2018.

KEY	FACILITY
1	1st and Broadway Park
2	City Hall Park Center
3	Spring Street Park
4	Pershing Square Park
5	Los Angeles Plaza Park (Father Serra Park)
6	Ord and Yale Street Park
7	Gladys Park
8	Alpine Recreation Center
9	Grand Hope Park
10	Miguel Contreras Learning Center Pool
11	Vista Hermosa Park
12	Los Angeles State Historic Park
13	Echo Park Deep Pool
14	Echo Park Boys and Girls
15	Rockwood Community Park
16	Patton Street Park
17	Everett Triangle Park (Tear Drop Park)
18	Pecan Pool
19	Unidad Park (Beverly Pocket Park)
20	Pecan Recreation Center
21	Aliso-Pico Recreation Center
22	Echo Park Recreation Center
23	Lilac Terrace Park
24	Prospect Park
25	Echo Park
26	Buena Vista Meadow Picnic Area
27	Hope and Peace Park
28	Downey Recreation Center
29	Hollenbeck Park
30	Montecillo De Leo Politi Park
31	Lake Street Park
32	Downey Pool
33	Parkview Photo Center
34	State Street Recreation Center
35	MacArthur Park Lake
36	MacArthur Park
37	Ross Valencia Community Park

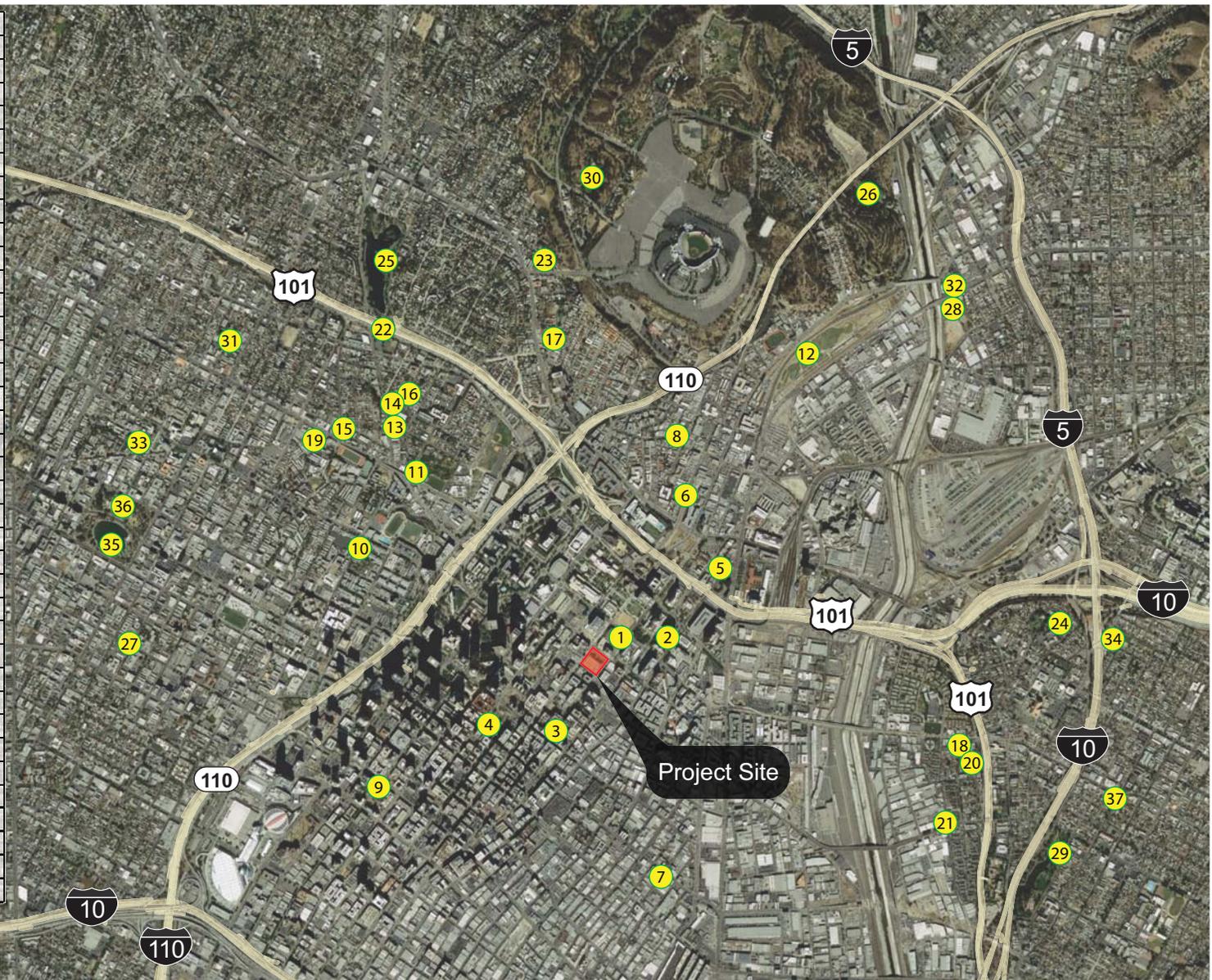


Figure IV.I.5-1
Parks and Recreational Facilities
Within a 2-Mile Radius of the Project Site

Source: Google Earth, 2017; Eyestone Environmental, 2017.

**Table IV.I.5-1
Parks and Recreational Facilities Within a Two-Mile Radius of the Project Site**

Map No.^a	Facility and Address	Distance from Project Site^b (miles)	Type of Park/ Recreational Facility	Amenities
1	1st and Broadway Park 217 W. 1st St. Los Angeles, CA 90012	0.12	Park	N/A (in planning stages; no opening date set)
2	City Hall Park Center 200 N. Main St. Los Angeles, CA 90012	0.14	Park	N/A
3	Spring Street Park 428 S. Spring St. Los Angeles, CA 90013	0.31	Park	Walking Paths, Benches, Grass Area
4	Pershing Square Park 532 S. Olive St. Los Angeles, CA 90013	0.45	Park, Concert	Stage and Amphitheater, Community Room, Ice Skating Rink (Seasonal)
5	Los Angeles Plaza Park (Father Serra Park) 125 Paseo De La Plaza Los Angeles, CA 90012	0.52	Park	N/A
6	Ord and Yale Street Park 524 W. Ord St. Los Angeles, CA 90012	0.68	Park	N/A
7	Gladys Park 6th & Gladys St. Los Angeles, CA 90021	0.81	Park	Basketball Courts (Unlighted/Outdoor), Outdoor Gym (without Weights), Picnic Tables
8	Alpine Recreation Center 817 Yale St. Los Angeles, CA 90012	0.89	Recreation Center	Auditorium, Basketball Courts (Lighted/Indoor), Basketball Courts (Lighted/Outdoor), Children's Play Area, Volleyball Courts (Lighted), Pergola, Small Grass Area, Table Tennis
9	Grand Hope Park 900 S. Hope St. Los Angeles, CA 90015	0.93	Park	N/A
10	Miguel Contreras Learning Center Pool 322 S. Lucas Ave. Los Angeles, CA 90017	0.95	Pool	Outdoor Pool
11	Vista Hermosa Park 100 N. Toluca St. Los Angeles, CA 90012	1.00	Park	Walking Trails, Children's Play Area, Picnic Tables, Restroom(s), and Soccer Field (Lighted)
12	Los Angeles State Historic Park 1245 N. Spring St. Los Angeles, CA 90012	1.14	Park	Pedestrian Walkways, Bike Paths, Event Space

Table IV.1.5-1 (Continued)
Parks and Recreational Facilities Within a Two-Mile Radius of the Project Site

Map No.^a	Facility and Address	Distance from Project Site^b (miles)	Type of Park/ Recreational Facility	Amenities
13	Echo Park Deep Pool 1419 Colton St. Los Angeles, CA 90026	1.18	Pool	Year Round Pool (Indoor/Heated)
14	Echo Park Boys and Girls 303 Patton St. Los Angeles, CA 90026	1.18	Community Center	N/A
15	Rockwood Community Park 1571 Rockwood St. Los Angeles, CA 90026	1.20	Park	Children's Play Area, Picnic Tables, Game Tables, Benches, Solar Lighting
16	Patton Street Park 327 Patton St. Los Angeles, CA 90026	1.24	Park	Children's Play Area, Outdoor Fitness Equipment, Walking Path, Benches
17	Everett Triangle Park (Tear Drop Park) Everett Street, One Block North of Sunset Echo Park, CA 90026	1.27	Park	N/A
18	Pecan Pool 120 S. Gless St. Los Angeles, CA 90033	1.34	Summer Pool	Seasonal Pool (Outdoor/Unheated)
19	Unidad Park (Beverly Pocket Park) 1644 W. Beverly Blvd. Los Angeles, CA 90027	1.37	Park	N/A
20	Pecan Recreation Center 145 S. Pecan St. Los Angeles, CA 90033	1.37	Recreation Center	Basketball Courts (Lighted/Indoor), Basketball Courts (Lighted/Outdoor), Children's Play Area, Community Room, Handball Courts (Lighted), Picnic Tables, Restroom(s), Seasonal Pool (Outdoor/Unheated), Volleyball Courts (Lighted), Multipurpose Sports Field, Baseball Diamond (Lighted)
21	Aliso-Pico Recreation Center 370 S. Clarence St. Los Angeles, CA 90033	1.42	Recreation Center	Children's Play Area, Auditorium, Basketball Courts (Lighted/Indoor), Basketball Courts (Lighted/Outdoor), Indoor Gym (Without Weights), Volleyball Courts (Lighted), Baseball Diamond (Lighted), Tennis Courts (Lighted), Community Room, Computer Labs (Two), Cultural Educational Facility, Kitchens (Two), Multi-Purpose Sports Field (With Lighted, Youth Sized)

Table IV.1.5-1 (Continued)
Parks and Recreational Facilities Within a Two-Mile Radius of the Project Site

Map No.^a	Facility and Address	Distance from Project Site^b (miles)	Type of Park/ Recreational Facility	Amenities
				Ball Diamond), and Music Room
22	Echo Park Recreation Center 1632 Bellevue Ave. Los Angeles, CA 90026	1.50	Recreation Center, Park	Barbecue Pits, Baseball Diamond (Lighted), Basketball Courts (Lighted/ Indoor), Basketball Courts (Lighted/ Outdoor), Children's Play Area, Community Room, Soccer Field (Lighted), Tennis Courts (Lighted), Stage, Picnic Tables, Indoor Gym (without Weights), Seasonal Pool (Outdoor/Unheated)
23	Lilac Terrace Park 1254 W. Lilac Terrace Los Angeles, CA 90012	1.54	Park	N/A
24	Prospect Park Echandia Street & Judson Street Los Angeles, CA 90033	1.60	Parks	Children's playground, Benches
25	Echo Park 751 E. Echo Park Ave. Los Angeles, CA 90026	1.71	Park, Lake, Aquatic	Pedal Boats, Picnic Tables, Walking Paths, Concessions
26	Buena Vista Meadow Picnic Area Meadow Road (East side of Dodger Stadium) Los Angeles, CA 90012	1.72	Park	Barbecue Pits, Children's Play Area, Picnic Tables, Benches
27	Hope and Peace Park 843 S. Bonnie Brae St. Los Angeles, CA 90057	1.78	Park	Basketball Courts (Unlighted/Outdoor), Benches
28	Downey Recreation Center 1772 N. Spring Street Los Angeles, CA 90031	1.82	Recreation Center, Park	Auditorium, Baseball Diamond (Lighted), Children's Play Area, Picnic Tables, Classroom(s), Club Room(s), Indoor Gym (without Weights), Kitchen, Multipurpose Sports Field, Stage
29	Hollenbeck Park 415 S. Saint Louis St. Los Angeles, CA 90033	1.82	Park, Recreation Center, Lake, Aquatic, Skate Park	Barbecue Pits, Children's Play Area, Picnic Tables, Lake, Bridge, Fishing (Permitted), Auditorium, Barbecue Pits, Children's Play Area, Community Room, Picnic Tables, Bandshell, Kitchen, Outdoor Fitness Equipment, Preschool, Skating (Fun Box), Skating (Pyramid), Skating (Rails), Skating (Ramps)

Table IV.1.5-1 (Continued)
Parks and Recreational Facilities Within a Two-Mile Radius of the Project Site

Map No.^a	Facility and Address	Distance from Project Site^b (miles)	Type of Park/ Recreational Facility	Amenities
30	Montecillo De Leo Politi Park On Stadium between Scott Road and Academy Road Los Angeles, CA 90012	1.84	Park	Barbecue Pits, Picnic Tables, Restroom(s), Tennis Courts (Unlighted), Benches, Grass Area, Hiking Trail, Horseshoe Pits
31	Lake Street Park 227 N. Lake St. Los Angeles, 90026	1.85	Park, Playground, Recreation Center, Skate Park	Basketball Courts (Lighted/Indoor), Basketball Courts (Lighted/Outdoor), Children's Play Area, Community Room, Indoor Gym (without Weights), Volleyball Courts (Unlighted), Small Grass Area, Skate Plaza, Skating Facility
32	Downey Pool 1775 N. Spring St. Los Angeles, CA 90031	1.85	Summer Pool	Seasonal Pool (Outdoor/Unheated)
33	Parkview Photo Center 2332 W. 4th Street Los Angeles, CA 90057	1.88	Community Photography Laboratory, Theater	Community Photography Laboratory/ Theater
34	State Street Recreation Center 716 N. State St. Los Angeles, CA 90033	1.88	Recreation Center	Auditorium, Baseball Diamond (Lighted), Basketball Courts (Lighted/Outdoor), Children's Play Area, Community Room, Kitchen, Multipurpose Sports Field, Stage
35	MacArthur Park Lake 653 S. Alvarado St. Los Angeles, CA 90057	1.89	Lake, Aquatic	Barbecue Pits, Children's Play Area, Pedal Boats, Picnic Tables, Synthetic Field, Walking Paths, Fishing Permitted
36	MacArthur Park 2230 W. 6th St. Los Angeles CA 90057	1.91	Park, Recreation Center	Children's Play Area, Picnic Tables, Bandshell, Kitchen, Outdoor Fitness Equipment, Synthetic Field, Multipurpose Room Baseball Diamond (Unlighted)
37	Ross Valencia Community Park 1st & Chicago St. Los Angeles, CA 9003	1.96	Park	N/A

^a Map numbers correspond with Figure IV.1.5-1 on page IV.1.5-13.

^b Distances represent approximate straight line distances, not driving distances.

Source: City of Los Angeles, Department of Recreation and Parks Facility Locator, www.laparks.org, accessed April 5, 2018; Los Angeles Parks Foundation, www.laparksfoundation.org/EN/, accessed April 5, 2018; Los Angeles State Historic Park, Our Story, <http://lashp.com/our-story/>,

**Table IV.1.5-1 (Continued)
Parks and Recreational Facilities Within a Two-Mile Radius of the Project Site**

Map No. ^a	Facility and Address	Distance from Project Site ^b (miles)	Type of Park/ Recreational Facility	Amenities
<p><i>accessed April 5, 2018; and written correspondence from Darryl Ford, Senior Management Analyst I, Planning, Maintenance, and Construction Branch, Department of Recreation and Parks, April 11, 2017.</i></p>				

approximate distances from the Project Site for these public parks and recreational facilities. In addition, the 1st and Broadway Park (also known as FAB Park) is in development on a 1.98-acre site located at 217 West 1st Street, approximately 0.12 mile north of the Project Site.^{25,26} The 1st and Broadway Park is in the planning stages, but no opening date has been set.²⁷

(2) Project Site

The northern portion of the Project Site was formerly developed with a surface parking lot, which is currently in use as a staging area for construction of the Metro Regional Connector 2nd Street/Broadway rail station and portal. The southern portion of the Project Site contains a five-story parking structure that includes rooftop parking and two subterranean levels. The structure currently provides 1,460 vehicular spaces, which are used by tenants of Los Angeles Times Square, as well as other businesses, commuters, and residents in the immediate area.

Current landscaping on the Project Site is limited to street trees and a narrow landscaped parkway that traverses the center of the site along the northerly edge of the existing parking structure. Trees in these areas include: 19 on-site non-protected trees; 12 on-site palm trees; and six street trees along Broadway and Spring Street. The landscaped parkway also includes shrubs and limited areas of turf, along with park benches. There are no parks or recreational facilities located on-site.

²⁵ *Written correspondence from Darryl Ford, Senior Management Analyst I, Planning, Maintenance, and Construction Branch, Department of Recreation and Parks, April 11, 2017.*

²⁶ *Mia Lehrer + Associates, 1st and Broadway Park (known as FAB Park), <http://studio-mla.com/design/fab-park/>, accessed August 5, 2018.*

²⁷ *Personal communication from Angie Ruiz, City of Los Angeles Department of Recreation and Parks, October 24, 2018.*

3. Project Impacts

a. Methodology

The methodology used to evaluate potential parks and recreation impacts included the following: (1) reviewing the existing parks and recreational facilities in the Project Site vicinity; (2) projecting the future population associated with the Project; and (3) evaluating the demand for parks and recreation service anticipated at the time of Project buildout 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).

b. Thresholds of Significance

(1) State CEQA Guidelines Appendix G

In accordance with State CEQA Guidelines Appendix G (Appendix G), the Project would have a significant impact related to parks and recreational facilities 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.

(2) 2006 L.A. CEQA Thresholds Guide

The *L.A. CEQA Thresholds Guide* states that the determination of significance shall be made on a case-by-case basis, considering the following criteria to evaluate impacts to parks and recreation facilities:

- The net population increase resulting from the proposed project;

- The demand for recreational and park services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand, and;
- Whether the project includes features that would reduce the demand for recreational and park services (e.g., on-site recreation facilities, land dedication or direct financial support to the Department of Recreation and Parks).

In assessing impacts related to parks and recreational facilities in this section, the City will use Appendix G as the thresholds of significance. The criteria identified above from the *L.A. CEQA Thresholds Guide* will be used where applicable and relevant to assist in analyzing the Appendix G threshold questions.

c. Analysis of Project Impacts

(1) Project Design Features

No specific Project design features beyond the Project's open space and recreational elements described below are proposed with regard to parks and recreation.

(2) Relevant Project Characteristics

As discussed in Section II, Project Description, of this Draft EIR, the Project involves the development of a 30-story mixed-use building consisting of 107 residential units (comprising an estimated 137,347 square feet), 7,200 square feet of ground level commercial uses, and 534,044 square feet of office uses in Downtown Los Angeles. The proposed residences would include 12 studios, 42 one-bedroom units, 40 two-bedroom units, and 13 three-bedroom units.

With respect to recreational uses and open space, amenity decks offering a variety of social and community spaces would be provided on building levels 8, 15, 19, and 27, and would include landscaped terraces, rooftop gardens, gathering spaces including barbeque and outdoor dining areas, and a swimming pool.²⁸ Indoor recreational spaces would include a fitness center, two common rooms, and a lounge. Private balconies also would be provided on various levels for both residences and some of the office uses.

²⁸ *The terrace provided on Level 19 is intended for use by office tenants only and thus is not included in the calculation of usable open space provided herein.*

In addition, a landscaped passage or paseo would be located between the new building and the existing parking structure to the south and would form a pedestrian pathway from Broadway and the Metro portal across the site to Spring Street. This paseo would include canopy trees, a variety of shrubs and grasses, planted trellises and potentially a water wall feature, benches and café seating, and permeable paving. Street trees and streetscape plantings also would be introduced along Broadway and Spring Street. The Project's landscaping would include drought-tolerant plants, including both native and adaptive native plant materials, and would incorporate an efficient irrigation system. Furthermore, a plaza surrounding the Metro portal would include planted areas, benches and café seating, and bicycle parking. The design of the plaza around the portal would be integrated and consistent with the paseo, thus creating a larger, public plaza at Broadway and 2nd Street that extends across the center of the site to Spring Street.

A total of 27,765 square feet of usable common open space (not including the Metro plaza) and 800 square feet of usable private open space (i.e., balconies) would be provided for Project residents.

(3) 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?

(a) City of Los Angeles Service Systems Element/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 are 6 acres per 1,000 residents. As stated above, the Central 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 serve as requirements for individual development projects. Furthermore, as described above in Section 2.a.(2)(e), 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.

Nonetheless, when applying the Citywide goals to the Project, based on the Project's estimated 261 residents, the Project would need to provide approximately

0.52 acre of neighborhood sites and facilities and approximately 0.52 acre of community sites and facilities to meet the Public Recreation Plan's guidelines. In total, the Project would need to provide a total of approximately 1.04 acres of park and recreational space in order to meet the Public Recreation Plan's combined guidelines for neighborhood and community sites and facilities.

As discussed further below, the Project would include 28,565 square feet or approximately 0.66 acre of usable open space, which would consist of a variety of open space features and recreational amenities to serve residents' recreational needs.²⁹ This amount of common open space would fall short of the Public Recreation Plan's guidelines for neighborhood and community 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. Furthermore, compliance with regulatory requirements, including applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces (discussed below), would ensure that the intent of the Public Recreation Plan's parkland guidelines would be met. Such requirements include the provision of on-site recreational amenities and open space and payment of the Dwelling Unit Construction Tax and Quimby fees.

(b) 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 prior to this date, the Project is not subject to the new park fee provisions and is instead subject to the LAMC provisions that were in effect when the Project's entitlement applications were deemed complete. An evaluation of the Project's consistency with these provisions is provided below.

As previously described, LAMC Section 12.21.G 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 12,675 square feet of usable open space, as shown in Table IV.1.5-2 on page IV.1.5-28 in the analysis below. The Project would provide a total of approximately 27,765 square feet of common usable open space, consisting of both indoor and outdoor open space for residents, and approximately 800 square feet of private usable open space in the form of balconies. Thus, the Project would meet and exceed the LAMC's requirement for the provision of usable open space.

²⁹ *The terrace provided on Level 19 is intended for use by office tenants only and thus is not included in the calculation of usable open space provided herein.*

According to LAMC Section 12.21.G, common open space must constitute at least 50 percent of the total required usable open space requirement. Therefore, the Project would be required to provide 6,338 square feet of common open space, as also shown in Table IV.1.5-2 on page IV.1.5-28 in the analysis below. The Project would exceed this requirement through the provision of 27,765 square feet of common usable open space.

Additionally, per Section 12.21.G, a minimum of 25 percent of the required common open space must be planted with ground cover, shrubs, and trees. All required landscaped areas shall be equipped with an automatic irrigation system and be properly drained. Therefore, the Project would be required to provide at least 3,169 square feet of planted common open space. As shown in as shown in Table IV.1.5-2 in the analysis below, the Project would provide approximately 60,571 square feet of planted common area, which would exceed the LAMC requirement. In addition, per Section 12.21.G, one 24-inch box tree per four dwelling units would be required. Based on the 107 dwelling units proposed by the Project, 27 trees would be required. The Project would provide a total of 42 trees, of which 20 trees would be located within the building's amenity decks and the remaining 22 trees would be located on the ground level. Therefore, the Project would be consistent with this provision as well.

LAMC Section 12.21.G requires that common open space be open to the sky; however, enclosed recreation rooms of at least 600 square feet or greater may count as common open space, but cannot qualify for more than 25 percent of the total required usable open space. On Level 8, the Project would provide 4,300 square feet of indoor amenities. This space would meet the minimum requirement of 600 square feet as set forth in LAMC Section 12.21.G. The indoor amenities space would constitute 15 percent of the total usable open space required. Therefore, the Project would be consistent with this provision regarding allowable indoor common open space.

As also previously discussed, the Project would adhere to the former provisions of LAMC Sections 12.33 and 17.12 regarding the dedication of land for park and recreational uses and/or payment of in-lieu fees for park improvements. Some of the recreational amenities proposed on-site, including the swimming pool as well as some of the common open space, may be credited against the Project's land dedication requirements, if approved by the City's Advisory Agency. In any event, the Project Applicant or its successor would be subject to the payment of any applicable Finn fees and Quimby fees, as determined by the City. Similarly, the Project Applicant or its successor would be subject to payment of the Dwelling Unit Construction Tax pursuant to LAMC Section 21.10.3(a)(1), as applicable. Accordingly, the Project would comply with applicable LAMC requirements.

(c) Central City Community Plan

The Project would support the objectives and policies of the Central City Community Plan through the provision of on-site open space, recreational amenities, and landscaping, as discussed above, which would offset the demand generated by Project residents for public parks and recreational facilities in the Central City Community Plan area. In addition, Project development would not diminish the quality or accessibility of, or result in the removal of, existing parks or recreational facilities in the Central City Community Plan area. As such, impacts with respect to consistency with the Central City Community Plan would be less than significant. The majority of the objectives and policies of the Central City Community Plan regarding parks and recreation identified above in Subsection 2.a.(2)(g) apply to the City as a whole, not individual development projects. However, Objective 4-1 and related Policy 4-1.1, which encourage the expansion and addition of open space, as well as Objective 4-4 and related Policy 4-4.1, which encourage traditional and non-traditional sources of open space, would apply to the Project. The Project would support Objectives 4-1 and 4-4 and the related policies, as well as the overall objective of the Central City Community Plan to increase and expand open spaces that are pedestrian-friendly, landscaped, and able to strengthen social interactions and community identity through the provision of on-site open space, recreational amenities, and landscaping. As such, the Project would not conflict with the parks and recreation policies of the Central City Community Plan.

(d) Conclusion

In determining the Project's potential impacts to public parks and recreational facilities, this analysis evaluates the demand for such facilities generated by Project residents, as well as the Project's consistency with relevant applicable plans, policies, and regulations. As discussed above, due to the amount, variety, and availability of the Project's proposed open space and recreational amenities, it is anticipated that Project residents would generally utilize on-site facilities and amenities to meet their recreational needs. As such, the Project would meet the applicable requirements set forth in LAMC Section 12.21 G. Furthermore, in accordance with the regulatory requirements discussed above, the Project Applicant would pay a Dwelling Unit Construction Tax in accordance with LAMC Section 21.10.3(a)(1) and comply with the former provisions of LAMC Section 17.12, which are applicable to the Project (i.e., those in effect when the Project's applications were deemed complete), regarding payment of Quimby fees. The Project would not meet the parkland provision goals set forth in the Public Recreation Plan. However, as previously indicated, these are Citywide goals and are not intended to be requirements for individual development projects. As such, the intent of the Public Recreation Plan's parkland standards would be addressed through compliance with applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces.

Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks (government facilities), need for new or physically altered parks (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. Impacts would be less than significant, and mitigation measures would not be required.

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?

(a) Construction

Project construction would temporarily introduce construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California and operation of the construction labor market, the likelihood that construction workers would relocate their households as a consequence of working on the Project is negligible. Therefore, the construction workers associated with the Project would not result in a notable increase in the residential population of the Project vicinity, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

During Project construction, 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. Although there is a potential for construction workers to spend their lunch breaks at the parks and recreational facilities near the Project Site, it is unlikely to occur at parks and recreational facilities beyond the immediate vicinity of the Project Site as lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes). As shown in Table IV.1.5-1 on page IV.1.5-14, the closest park facilities to the Project Site are 1st and Broadway Park (which is currently under construction but will be operational by the time Project construction begins), located one block northeast of the Project Site, and City Hall Park Center, located two blocks to the northeast; all other parks identified in Table IV.1.5-1 are located further away from the Project Site and are unlikely to be used during construction worker lunch breaks. The resulting increase, if any, in the use of such parks and recreational facilities would be temporary and negligible.

As described in Section IV.J, Transportation/Traffic, of this Draft EIR, while construction activities generally would be contained within the boundaries of the Project Site, construction would generate traffic associated with the movement of construction equipment and the hauling of soil and construction materials to and from the Project Site.

However, the Project's designated haul routes would not pass adjacent to any public park or recreational facility (refer to park and recreational facility locations in Figure IV.1.5-1 on page IV.1.5-14).³⁰ Therefore, use of the haul routes would not be expected to result in access restrictions to City parks and recreation facilities in the Project vicinity or interfere with existing park usage in a manner that would substantially reduce the service quality of existing parks in the vicinity.

Based on the above analysis, Project construction would not generate a demand for park or recreational facilities that could not be adequately accommodated by existing or planned facilities and services. Therefore, impacts on parks and recreational facilities during Project construction would be less than significant, and mitigation measures would not be required.

(b) Operation

As discussed in Section II, Project Description of this Draft EIR, the northern portion of the Project Site is developed with a surface parking lot (currently in use as a staging area for construction of the Metro Regional Connector 2nd Street/Broadway rail station), and the southern portion is developed with a five-story parking structure. Current landscaping on the Project Site is limited to street trees and a narrow, landscaped parkway that traverses the center of the Project Site along the northerly edge of the existing parking structure. Upon Project completion, the new mixed-use building would provide 107 residential units, approximately 7,200 square feet of ground level commercial uses, and 534,044 square feet of office uses. As housing does not currently exist on the Project Site, there are currently no residents on-site that generate a demand for parks and recreational facilities in the Project vicinity. As discussed in Section IV.H, Population, Housing and Employment, of the Draft EIR, the Project's new residential units would introduce an estimated residential population of 261 persons, based on an average household size of 2.44 persons per multi-family housing unit in the City of Los Angeles.³¹ The population increase associated with the Project would generate additional demand for parks and recreational facilities in the Project vicinity.

³⁰ *The haul route to/from Chiquita Canyon Landfill is anticipated to follow segments of 2nd Street, Spring Street, 3rd Street, and Aliso Street in Downtown Los Angeles; CA-110, US-101, CA-170, and I-5; as well as Newhall Ranch Road, SR-126, and Henry Mayo Drive in Castaic. Alternatively, the haul route to/from Irwindale Landfill would follow segments of 2nd Street, Spring Street, 4th Street, Los Angeles Street, El Monte Busway East, and Arcadia Street in Downtown; US-101 and I-10; and Vincent Drive in Irwindale.*

³¹ *Based on 2015 Census American Community Survey 5-Year Estimate data (2011–2015), per correspondence with Jack Tsao, Housing Planner, Los Angeles Department of City Planning, March 29, 2017.*

As previously described, various floors of the new building would include amenities to serve the recreational needs of Project residents and guests. Specifically, the proposed amenity decks would provide a series of landscaped terraces, rooftop gardens, gathering spaces including barbeque and outdoor dining areas, and an outdoor swimming pool. Indoor recreational spaces would include a fitness center, two common rooms, and a lounge. Private balconies also would be provided on various levels for both residences and some of the office uses. Additional open space would be provided at ground level within the landscaped paseo located between the new building and the existing parking structure to the south. The paseo would form a pedestrian pathway from Broadway and the Metro portal across the site to Spring Street and would include heavy landscaping and potentially a water wall feature, benches and café seating, and permeable paving. The paseo would be integrated with the plaza surrounding the Metro portal, which would include planted areas, benches and café seating, and bicycle parking. Although the Metro plaza is not part of the Project, together these outdoor spaces would create a larger, public plaza at Broadway and 2nd Street that extends across the center of the Project Site to Spring Street.

As shown in Table IV.1.5-2 on page IV.1.5-28, the Project would provide a total of approximately 27,765 square feet of common usable open space and 800 square feet of private usable open space for Project residents. In total, approximately 28,565 square feet of open space would be provided, which would exceed the open space requirement of 12,675 square feet as set forth by LAMC Section 12.21.G.

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 amenities to meet their recreational needs. Thus, while the Project's estimated 261 residents could 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, as discussed in detail in Section IV.H, Population, Housing and Employment, of the Draft EIR, the Project's commercial and office components, which are estimated to generate approximately 2,322 employees, could result in a demand for parks and recreational facilities. However, it is anticipated that Project employees also would primarily utilize on-site open space during their time spent at work (e.g., eating in the paseo during a lunch break), resulting in a negligible demand for off-site parks and recreational facilities. Furthermore, as discussed below, the Project would pay a Dwelling Unit Construction Tax in accordance with LAMC Section 21.10.3(a)(1) and would comply with the requirements of former LAMC Section 17.12 (applicable at the time the Project applications were deemed complete) regarding the payment of Quimby fees. Therefore, the Project would not significantly increase the demand for off-site public parks and recreational facilities.

**Table IV.1.5-2
Open Space Required and Provided by the Project**

Open Space Requirement			
Open Space Requirement	Quantity	Required Open Space	Total Open Space Required
Residential Housing			
Loft/Studio (with less than 3 habitable rooms)	12 du	100 sf per unit	1,200 sf
1-Bedroom (with less than 3 habitable rooms)	42 du	100 sf per unit	4,200 sf
2-Bedroom (with 3 habitable rooms)	40 du	125 sf per unit	5,000 sf
3-Bedroom (more than 3 habitable rooms)	13 du	175 sf per unit	2,275 sf
Total Usable Open Space Required			12,675 sf
Minimum Common Open Space Required (50 Percent of Total Open Space)			6,338 sf
Proposed Open Space			
Open Space Proposed			Total Open Space Provided
Private Open Space			
Balconies at Level 23-26			800 sf
Total Provided Private Open Space			800 sf
Common Open Space^a			
Ground Level			6,751 sf
Indoor Amenities Rooms at Level 08			4,300 sf
Roof Garden/Pool Deck at Level 08			9,174 sf
Roof Garden at Level 27			7,540 sf
Total Provided Common Open Space			27,765 sf
Total Usable Open Space			28,565 sf
Proposed Landscaped Area			
Location	Softscape	Hardscape	Total Landscaped Area
Ground Level	4,994 sf	25,091 sf	30,085 sf
Roof Garden/Pool Deck at Level 08	2,041 sf	13,531 sf	15,572 sf
Roof Garden at Level 15	2,043 sf	4,977 sf	7,020 sf
Roof Garden at Level 27	2,386 sf	5,508 sf	7,894 sf
Total	11,464 sf	49,107 sf	60,571 sf
Permeable Surface at Ground Level			18,996 sf
<p><i>du = dwelling units</i> <i>sf = square feet</i> ^a <i>The terrace provided on Level 19 is intended for use by office tenants only and thus is not included in the calculation of Code-required usable open space.</i> <i>Source: Psomas, AHBE Landscape Architects, and Gensler, 2017.</i></p>			

In determining the Project's potential impacts to parks and recreational facilities, this analysis evaluates the potential demand of Project residents 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, due to the amount, variety, and availability of the Project's proposed open space and recreational amenities, it is anticipated that Project residents would generally utilize on-site amenities to meet their recreational needs. Furthermore, the Project would meet the applicable requirements set forth in LAMC Sections 12.21, 17.12, and 21.10.3(a)(1), discussed above. 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 serve as requirements for individual development projects. Compliance with applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces would ensure that the intent of the Public Recreation Plan's parkland standards would be met. Such requirements include the provision of on-site open space, payment of the Dwelling Unit Construction Tax, and compliance with the City's Quimby Ordinance requirements.

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 facilities would occur or be accelerated. Impacts to parks and recreational facilities would be less than significant, and no mitigation measures are required.

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?

As detailed above, the Project would comply with regulations regarding open space and recreational facilities. In addition, although the Project would introduce a residential population that would generate a demand for parks and recreational facilities, Project residents would be anticipated to utilize the Project's on-site open space and recreational facilities to a greater extent than off-site facilities. Furthermore, the Project includes a landscaped paseo that would connect to and be integrated with the plaza surrounding the on-site Metro portal.

Therefore, the Project would not include or require the construction or expansion of recreational facilities that would result in adverse physical effects on the environment. Impacts would be less than significant, and no mitigation measures are required.

4. Cumulative Impacts

Cumulative growth in the Project vicinity includes specific known development projects, as well as general ambient growth projected to occur. As identified in Section III, Environmental Setting, of this Draft EIR, a total of 173 related projects are located in the vicinity of the Project Site. Much of this growth is anticipated by the City and will be incorporated into the Central City Community Plan Update, known as the DTLA 2040 Plan, which the Department of City Planning is in the process of preparing (refer to Section IV.F, Land Use, of this Draft EIR for further discussion). According to the DTLA 2040 projections, an additional approximately 125,000 people, 70,000 housing units, and 55,000 jobs will be added to the Downtown area by the year 2040.³²

All 173 identified related projects fall within a 2-mile radius of the Project Site, which is the geographic area analyzed for purposes of assessing impacts to parks and recreational facilities. As noted above, the Central City Community Plan area is currently underserved with respect to the parkland standards set forth in the Public Recreation Plan. As the population continues to grow in the Project vicinity, increased demand will reduce the existing parkland to population ratio if new park and recreational facilities are not constructed. It is noted that 1st and Broadway Park, located on a 1.98-acre site at 217 West 1st Street approximately 0.12 mile north of the Project Site, is under development although an opening date has not been set.

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 Central City Community Plan area's deficiency in parkland relative to the Public Recreation Plan's standards. The 1st and Broadway Park in development, however, would make a positive contribution toward meeting these goals, once constructed. Even so, as previously indicated, the standards set forth in the Public Recreation Plan are Citywide goals and are not intended to serve as requirements for individual development projects. Furthermore, as with the Project, the related projects and other future development projects in the Community Plan area would undergo discretionary review on a case-by-case basis and would be expected to coordinate with the DRP. Similar to the Project, future development projects would be required to comply with LAMC Sections 12.21, 17.12, and 21.10.3(a)(1), and some also may be required to comply with recently revised LAMC Sections 17.12 and 12.33 (pursuant to the Ordinance), as applicable.

³² *Growth projections current as of December 2018. Source: City of Los Angeles, DTLA 2040, About This Project, www.dtl2040.org/, accessed December 6, 2018.*

Based on compliance with these regulatory requirements, cumulative impacts to parks and recreational facilities would be less than significant. Furthermore, based on the above, the Project's contribution to cumulative impacts to parks and recreational facilities would not be cumulatively considerable.

5. Mitigation Measures

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

6. Level of Significance After Mitigation

Project-level and cumulative impacts related to parks and recreational facilities would be less than significant without mitigation.