

IV. Environmental Impact Analysis

J.4 Public Services—Recreation and Parks

1. Introduction

This section of the Recirculated 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 (RAP). The analysis addresses questions listed in Section XIV, Public Services—Parks, and Section XV, Recreation, in Appendix G of the State CEQA Guidelines (Appendix G). CEQA requires projects to analyze the physical impacts associated with the provision of new or altered facilities, the construction of which could cause significant environmental impacts and the physical deterioration of existing parks from new project demands. The demand for park and recreational facilities created by the Project is evaluated in light of the open space and recreational facilities to be provided as part of the Project and applicable City goals and regulatory requirements regarding the need for such facilities. Information and analysis in this section is based, in part, on existing service ratios, existing parks and recreational facilities, and other information provided by the Los Angeles Department of RAP in correspondence dated January 19, 2021. This correspondence is included in Appendix I of this Recirculated Draft EIR.

2. Environmental Setting

a. Regulatory Framework

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

- Quimby Act;
- City of Los Angeles Charter;
- City of Los Angeles General Plan, including:
 - Framework Element;
 - Open Space Plan;

- Public Recreation Plan;
- Health and Wellness Plan;
- Palms–Mar Vista–Del Rey Community Plan;
- Los Angeles Municipal Code (LAMC);
- Los Angeles Department of Recreation and Parks 2009 Citywide Community Needs Assessment; and
- Los Angeles Department of Recreation and Parks—50 Parks Initiative.

(1) State

(a) Quimby Act

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

(2) Local

(a) The City of Los Angeles Charter

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

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

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

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

The Framework Element Chapter 9, Infrastructure and Public Services, contains policies and objectives that address the provision of parks within the City. These standards are addressed in the following policies and shown in Table IV.L.4-1 on page IV.J.4-4.

(ii) Open Space Element

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

(iii) Service Systems Element—Public Recreation Plan

As a part of the General Plan's Service Systems Element, the Public Recreation Plan (PRP) establishes policies and standards related to parks, and recreational facilities in the City. The PRP was adopted in 1980 by the Los Angeles City Council and amended by City Council resolution in March 2016. The amendments modernize the PRP's recommendations and provide for more flexibility and equity in the distribution of funds used for the acquisition and development of recreational resources. The PRP also addresses the need for publicly accessible neighborhood, community, and regional recreational sites and facilities across the City. The PRP focuses on recreational site and facility planning in underserved neighborhoods with the fewest existing resources and the greatest number of potential users (i.e., where existing residential development generates

**Table IV.L.4-1
Relevant General Plan Policies**

Framework Element—Chapter 6, Open Space and Conservation	
Policy 6.2.1	Establish, where feasible, the linear open space system represented in the Citywide Greenways Network map, to provide additional open space for active and passive recreational uses and to connect adjoining neighborhoods to one another and to regional open space resources.
Policy 6.2.2	Protect and expand equestrian resources, where feasible, and maintain safe links in major public open space areas such as Hansen Dam, Sepulveda Basin, Griffith Park, and the San Gabriel, Santa Monica, Santa Susanna Mountains and the Simi Hills.
Policy 6.4.1	Encourage and seek to provide for usable open space and recreational facilities that are distributed throughout the City.
Policy 6.4.2	Encourage increases in parks and other open space lands where deficiencies exist, such as South East and South Central Los Angeles and neighborhoods developed prior to the adoption of the State Quimby Act in 1965
Policy 6.4.3	Encourage appropriate connections between the City's neighborhoods and elements of the Citywide Greenways Network.
Policy 6.4.5	Provide public open space in a manner that is responsive to the needs and wishes of the residents of the City's neighborhoods through the involvement of local residents in the selection and design of local parks. In addition to publicly-owned and operated open space, management mechanisms may take the form of locally run private/non-profit management groups, and should allow for the private acquisition of land with a commitment for maintenance and public access.
Policy 6.4.6	Explore ways to connect neighborhoods through open space linkages, including the "healing" of neighborhoods divided by freeways, through the acquisition and development of air rights over freeways (such as locations along the Hollywood Freeway between Cahuenga Pass and Downtown), which could be improved as a neighborhood recreation resource.
Policy 6.4.7	Consider as part of the City's open space inventory of pedestrian streets, community gardens, shared school playfields, and privately-owned commercial open spaces that are accessible to the public, even though such elements fall outside the conventional definitions of "open space." This will help address the open space and outdoor recreation needs of communities that are currently deficient in these resources
Policy 6.4.8	Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods.
Policy 6.4.9	Encourage the incorporation of small-scaled public open spaces within transit-oriented development, both as plazas and small parks associated with transit stations, and as areas of public access in private joint development at transit station locations.
Policy 6.4.11	Seek opportunities to site open space adjacent to existing public facilities, such as schools, and encourage the establishment of mutually beneficial development agreements that make privately-owned open space accessible to the public. For example, encourage the improvement of scattered small open spaces for public access in private projects with small branch libraries, child care centers, or decentralized schools.
Framework Element—Chapter 9, Infrastructure and Public Services	
Policy 9.23.2	Prioritize the implementation of recreation and park projects in areas of the City with the greatest existing deficiencies.

Table IV.L.4-1 (Continued)
Relevant General Plan Policies

Framework Element—Chapter 9, Infrastructure and Public Services (Continued)	
Policy 9.23.5	Re-evaluate the current park standards and develop modified standards which recognize urban parks, including multi-level facilities, smaller sites, more intense use of land, public/private partnerships and so on.
Policy 9.23.7	Establish guidelines for developing non-traditional public park spaces like community gardens, farmer's markets, and public plazas.
Policy 9.24.1	Phase the development of new programs and facilities to accommodate projected growth.
<hr/> <i>Source: City of Los Angeles, The Citywide General Plan Framework, An Element of the City of Los Angeles General Plan, re-adopted 2001.</i>	

the greatest demand), as well as areas where new subdivisions, intensification of existing residential development, or redevelopment of “blighted” residential areas creates new demand.

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

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

For community recreational sites and facilities, the amended PRP states that facilities may be of any size, but are generally larger than neighborhood parks, and a high school site may be counted toward half the acreage requirement/service level per capita. The amended PRP does not define a specific service radius for community recreational

sites and facilities, instead recommending that they should generally be accessible within a relatively short bicycle, bus, or car trip, and easily accessible.

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

(iv) Health and Wellness Element

The City's *Plan for a Healthy Los Angeles* lays the foundation to create healthier communities for all Angelenos. As an Element of the General Plan, it provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City's future growth and development. Chapter 3 of the Plan, Bountiful Parks and Open Spaces, outlines policies and objectives to increase the availability of parks through park funding and allocation, park expansion, the Los Angeles River, park quality and recreation programs, park safety, local partnerships, water recreation, and active spaces. Specifically, the objectives include:

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

(v) Community Plan

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans

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

(c) Los Angeles Municipal Code (LAMC)

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

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

As stated in LAMC Section 12.21 G, usable open space is defined as areas designated for active or passive recreation and may consist of private and common areas. Common open space areas must be readily accessible to all residents of the site and constitute at least 50 percent of the total required usable open space. Common open space areas can incorporate recreational amenities such as swimming pools, spas, picnic tables, benches, children's play areas, ball courts, barbecue areas, and sitting areas. A minimum of 25 percent of the outdoor common open space area must be planted with ground cover, shrubs, or trees. Indoor recreational amenities can account for up to 25 percent of the usable open space requirements. Private open space is defined in an

area that is contiguous to and immediately accessible from an individual dwelling unit, may have a dimension no less than 6 feet in any direction and must contain a minimum of 50 square feet, of which no more than 50 square feet per dwelling unit can be counted toward the total required usable open space.

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

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

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

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

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

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

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

(e) 50 Parks Initiative

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

b. Existing Conditions

(1) Local Area

As previously stated, the Department of RAP is responsible for the establishment, operation, and maintenance of parks and recreational facilities within the City. Currently, the Department of RAP maintains and operates more than 446 sites for recreational use including 423 playgrounds, 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.^{1,2} The

¹ Los Angeles Department of Recreation and Parks, *Park Proud LA Strategic Plan 2018–2022*, p. 9.

² Los Angeles Department of Recreation and Parks, *Who We Are*, www.laparks.org/departments/who-we-are, accessed July 6, 2023.

Department of RAP also administers more than 16,000 acres of parkland, which includes Griffith Park, one of the largest urban parks in North America.³

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 that are administered by the Department of RAP are evaluated. As shown in Figure IV.J.4-1 on page IV.J.4-11, there are a number of parks and recreational facilities operated by the Department of RAP located within an approximate 2-mile radius of the Project Site. Table IV.J.4-1 on page IV.J.4-12 lists the type of park, amenities, and approximate driving distance from the Project Site for these public parks and recreational facilities.

There are two additional parks and recreational facilities in the vicinity of the Project Site that while are not operated by the City's Department of RAP could be used by Project residents. These include Yvonne B. Burke Park located approximately 0.6 mile west of the Project Site and Burton Chace Park located approximately 1 mile southwest of the Project Site. Both parks are operated by the Los Angeles County Department of Parks and Recreation.

Yvonne B. Burke Park is an 8-acre linear park that begins across from the Lloyd Taber-Marina del Rey County Library and extends to Parking Lot 7. The park offers a par course fitness circuit featuring exercise equipment and surfacing and is lit for night workouts. The park also includes seating benches, drinking fountains, and pet stations. The Marvin Braude Bike Trail also runs through the park. This bike path extends from Pacific Palisades to Torrance.

Burton Chace Park is located approximately 1 mile southwest of the Project Site. The 10-acre park offers a multi-purpose room, picnic tables, barbecues, pergolas, picnic shelters, outdoor programs, harbor viewing areas, and guest docks.

(2) Project Site

The Project Site is currently occupied by three structures, including a two-story Barnes & Noble bookstore located along the northeast corner of the Project Site, near the Maxella Avenue and Glencoe Avenue intersection; a single-story building occupied by a United States Post Office and a variety of retail uses located generally within the southern portion of the Project Site, along Glencoe Avenue; a two-story commercial and retail building located generally within the western portion of the Project Site; and associated

³ Los Angeles Department of Recreation and Parks, *Park Proud LA Strategic Plan 2018–2022*, p. 9.

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 **Via Dolce Park**
3501–3507 Via Dolce, Marina Del Rey, CA 90292
- 5 **Oakwood Recreation Center**
767 California Ave., Venice, CA 90291
- 6 **Canal Park**
200 Linnie Canal, Venice, CA 90291
- 7 **Penmar Recreation Center**
1341 Lake St., Venice, CA 90291
- 8 **Venice of America Centennial Park**
501 S. Venice Boulevard, Venice, CA 90291
- 9 **Penmar Golf Course**
1233 Rose Ave., Venice, CA 90291
- 10 **Titmouse Park**
415 Culver Blvd., Playa Del Rey, CA 90293
- 11 **Del Rey Lagoon**
6660 Esplanade Place, Playa Del Rey, CA 90293
- 12 **Venice Beach Recreation Center & Boardwalk**
1800 Ocean Front Walk, Venice, CA 90291
- 13 **Venice Reservoir Site**
3224 S. Centinela Ave., Los Angeles, CA 90066
- 14 **Westminster Dog Park**
1234 Pacific Ave., Venice, CA 90291
- 15 **Culver Slauson Recreation Center**
5072 S. Slauson Ave., Culver City, CA 90230

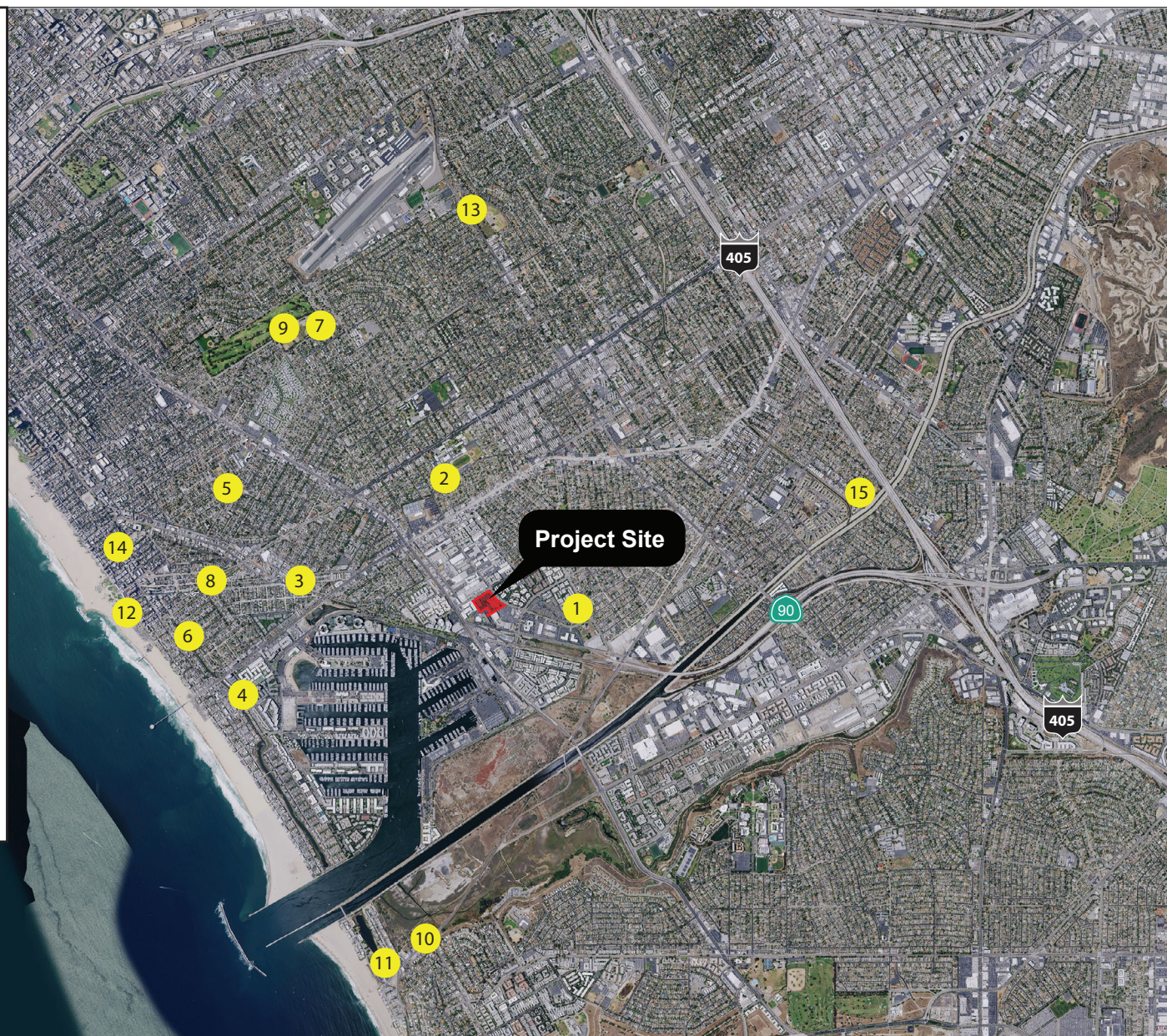


Figure IV.J.4-1

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

**Table IV.J.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	0.55	Community Park	Playground, Picnic Tables, Basketball Courts
2	Venice High School Indoor Pool 2490 Walgrove Ave. Los Angeles, CA 90066	0.64	Year-Round Pool (Community Resource)	Swimming Sports, Lifeguard Training, Lap Swimming
3	Triangle Park Oxford Ave. & Marr St. Venice, CA 90291	0.94	Neighborhood Park	Basketball Courts, Play Area
4	Via Dolce Park 3501–3507 Via Dolce Marina Del Rey, CA 90292	1.35	Neighborhood Park	Children's Play Area
5	Oakwood Recreation Center 767 California Ave. Venice, CA 90291	1.45	Recreation Center (Community Park)	Baseball, Basketball, Soccer, After School Programs, Arts Programs, Seasonal Camps, Computer Lab, Community Room
6	Canal Park 200 Linnie Canal Venice, CA 90291	1.51	Neighborhood Park	Children's Play Area, Pond
7	Penmar Recreation Center 1341 Lake St. Venice, CA 90291	1.65	Recreation Center (Community Park)	Baseball, Basketball, Soccer, Seasonal Day Camp, Pre-School, After School Club, Children's Play Area, Kitchen, Gymnasium
8	Venice of America Centennial Park 501 S. Venice Boulevard Venice, CA 90291	1.7	Neighborhood Park	Walking paths
9	Penmar Golf Course 1233 Rose Ave. Venice, CA 90291	1.75	Golf Course	Golf
10	Titmouse Park 415 Culver Blvd. Playa Del Rey, CA 90293	1.76	Neighborhood Park	Benches
11	Del Rey Lagoon 6660 Esplanade Place Playa Del Rey, CA 90293	1.84	Community Park, Lake, Aquatic	Baseball, Basketball, Lagoon
12	Venice Beach Recreation Center & Boardwalk 1800 Ocean Front Walk Venice, CA 90291	1.85	Beach (Regional Park)	Basketball, Weightlifting, Bike Path, Children's Play Areas, Pier, Handball, Paddle Tennis, Gymnastics, Skate Park

Table IV.J.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
13	Venice Reservoir Site 3224 S Centinela Ave. Los Angeles, CA 90066	1.90	Park	Baseball, Picnic Area
14	Westminster Dog Park 1234 Pacific Ave. Venice, CA 90291	1.95	Dog Park (Neighborhood Park)	Dog Park
15	Culver/Slauson Recreation Center 5070 S. Slauson Ave. Culver City, CA 90230	1.99	Recreation Center (Community Park)	Youth Sports Programs, Picnic Areas, Basketball, Bike Path, Outdoor Fitness Equipment, Tetherball
<p>^a Map numbers correspond with Figure IV.J.4-1 on page IV.J.4-11.</p> <p>^b Distances are approximate driving distances from Project Site.</p> <p>Source: Eyestone Environmental, 2023; City of Los Angeles, Department of Recreation and Parks Facility Locator, www.laparks.org, accessed June 9, 2023.</p>				

surface parking and circulation areas. Limited ornamental landscaping is provided within the Project Site. There are no parks or recreational facilities located on-site.

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 parks and recreation if it would:

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

d. Analysis of Project Impacts

As set forth in Section II, Project Description, of this Recirculated Draft EIR, the Project proposes two development options—Option A and Option B. Under Option A, the Project proposes the development of 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. Option B proposes the development of 425 multi-family residential units, 90,000 square feet of office space, and 40,000 square feet of neighborhood-serving commercial uses, including approximately 20,000 square feet of retail space and approximately 20,000 square feet of restaurant space. Both development options are evaluated in the following analysis.

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

(1) Impact Analysis

(a) 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 that would result in the need for new parks and recreational facilities or the expansion of existing 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 material 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 as the short time available (30 to 60 minutes) would make it difficult to travel to and from offsite locations for lunch. 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.

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. **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 the construction of the Project would be less than significant.**

(b) Operation

As discussed in detail in Section II, Project Description, of this Recirculated Draft EIR, Option A 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. Option B proposes the development of 425 multi-family residential units, 90,000 square feet of office space, and 40,000 square feet of neighborhood-serving commercial uses, including approximately 20,000 square feet of retail space and approximately 20,000 square feet of restaurant space. Based on the City of Los Angeles Department of Transportation City of Los Angeles VMT Calculator Documentation, development of up to 658 units at the Project Site under Option A would result in a net population increase of approximately 1,481 residents.⁴

⁴ Based on the City of Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the "Multi-Family Residential" generation rate of 2.25 persons per unit.

Under Option B, the development of up to 425 units at the Project Site would result in an increase of approximately 957 residents.⁵ In addition, the development of up to 27,300 square feet of neighborhood-serving retail and restaurant uses under Option A would generate approximately 82 employees.⁶ Under Option B, the development of up to 90,000 square feet of office uses and 40,000 square feet of neighborhood-serving retail and restaurant uses would generate approximately 480 employees.⁷ Thus, Option A would generate a total population of approximately 1,345 persons on-site and Option B would generate a total population of approximately 1,219 persons on-site. As such, the population increase associated with Option A or Option B 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 Recirculated Draft EIR, the Project would provide a variety of open space and recreational amenities to comply with the LAMC requirements. As summarized in Table IV.J.4-2 on page IV.J.4-18, Option A would provide a total of approximately 70,175 square feet of open space, equivalent to approximately 1.6 acres, in accordance with the open space requirements of the LAMC. In particular, Option A 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.

Under Option B, private open space and recreational amenities available to residents and guests of residents would include balconies, courtyard areas at the second

⁵ Based on the City of Los Angeles Department of Transportation and Los Angeles Department of City Planning, City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the “Multi-Family Residential” generation rate of 2.25 persons per unit.

⁶ Based on employment generation factors from City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the “General Retail” employee generation rate of 2 employees per 1,000 square foot applied to the proposed retail uses (13,650 square feet) and the “High-Turnover-Sit-Down Restaurant” employee generation rate of 4 employees per 1,000 square foot applied to the proposed restaurant uses (13,650 square feet).

⁷ Based on employment generation factors from City of Los Angeles VMT Calculator Documentation, May 2020, Table 1. Based on the “General Office” employee generation rate of 4 employees per 1,000 square foot applied to the proposed (90,000 square feet), the “General Retail” employee generation rate of 2 employees per 1,000 square foot applied to the proposed retail uses (20,000 square feet), and the “High-Turnover-Sit-Down Restaurant” employee generation rate of 4 employees per 1,000 square foot applied to the proposed restaurant uses (20,000 square feet).

Table IV.J.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
Option A			
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
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	
Option B			
Residential Apartments			
Studio	56 du	100 sf per unit	5,600 sf
1BR/1BA	236 du	100 sf per unit	23,600 sf
2BR	133 du	125 sf per unit	16,625 sf
Total Open Space Required			45,825 sf
Open Space Proposed		Total Open Space	
Proposed Common Open Space			
Roof Decks and Courtyards		51,145 sf	
Park		41,600 sf	
Total Common Open Space Proposed		92,745 sf	
Proposed Private Open Space (balconies)		17,000 sf	
Total Open Space Proposed		109,745 sf	
du = dwelling units sf = square feet Source: TCA Architects, 2017.			

level, landscaped open space, pools, a spa, and outdoor kitchens with lounges and seating areas. Option B would also include a large landscaped public park along Glencoe Avenue. This park would include seating areas and a water feature. Trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue. In total, as summarized in Table IV.J.4-2, Option B would provide

approximately 109,745 square feet (2.5 acres) of open space and recreational amenities, exceeding the open space requirements of the LAMC.

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 any one of the many off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities that would be available for residents. 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, 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. 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 Ordinance. Rather, the Project is subject to the provisions that were in effect at the time the Project was deemed complete. **Overall, the 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. Therefore, impacts to parks during operation of the Project would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts with regard to parks and recreation were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

(1) Impact Analysis

(a) Construction

As discussed above, 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 that would result in the need for new parks and recreational facilities or the expansion of existing facilities. 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 as the short time available (30 to 60 minutes) would make it difficult to travel to and from offsite locations. However, any resulting increase in the use of such parks and recreational facilities would be temporary and negligible. Thus, the construction of the Project would not generate a demand for park facilities that cannot be adequately accommodated by existing or planned facilities and services. **Therefore, the construction workers associated with the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of park and recreational facilities would occur. Impacts would be less than significant.**

(b) Operation

As discussed above, while the Project would introduce a new residential population within the Project Site that would result in an increase in the use of existing neighborhood and regional parks and other recreation facilities, the Project would comply with (Option A) and exceed (Option B) the City's requirements regarding the provision of open space for the number of residential units to be provided. Specifically, as summarized in Table IV.J.4-2 on page IV.J.4-18, Option A would provide a total of approximately 70,175 square feet of open space, equivalent to approximately 1.6 acres, in accordance with the open space requirements of the LAMC. Option A 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.

Under Option B, private open space and recreational amenities available to residents and guests of residents would include balconies, courtyard areas at the second

level, landscaped open space, pools, a spa, and outdoor kitchens with lounges and seating areas. Option B would also include a large landscaped public park along Glencoe Avenue. This park would include seating areas and a water feature. Trees and other landscaping features would also be planted throughout the Project Site and along Maxella Avenue and Glencoe Avenue. In total, as summarized in Table IV.J.4-2 on page IV.J.4-18, Option B would provide approximately 109,745 square feet (2.5 acres) of open space and recreational amenities, exceeding the open space requirements of the LAMC.

As discussed previously, 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 such, the Project is not subject to the park fee provisions of the Park Fee Ordinance. Overall, due to the amount, variety, and availability of the open space and recreational amenities proposed by the Project, 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. If new facilities were necessary at some point in the future, State law (CEQA) would require that associated impacts be evaluated and mitigated if necessary and feasible. **Therefore, Project operation would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of park and recreational facilities would occur. Impacts would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts with regard to parks and recreation were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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

(1) Impact Analysis

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, a total of 70,175 square feet of usable open space would be required under Option A and 45,825 square feet of usable open space under Option B. As summarized in Table IV.J.4-2 on page IV.J.4-18, Option A would provide a total of approximately 70,175 square feet of open space in accordance with the open space requirements of the LAMC. Option B would provide approximately 109,745 square feet (2.5 acres) of open space, exceeding the open space requirements of the LAMC. As described above and in Section II, Project Description, of this Recirculated Draft EIR, the Project proposes numerous open space areas and recreational amenities throughout the Project Site that could be used by Project residents and visitors. Additionally, the residential buildings would include resident amenities such as fitness areas, game rooms, lounges, and meeting rooms. **Therefore, as the Project would comply with the City's requirements regarding the provision of open space and due to the amount, variety, and availability of the Project's proposed open space and recreational amenities, the Project would not require the construction or expansion of existing recreational facilities, the construction of which might have an adverse physical effect on the environment. Impacts would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Project-level impacts with regard to parks and recreation were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e. Cumulative Impacts

(1) Impact Analysis

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 total of 14 related projects have been identified in the vicinity of the Project Site (specifically, within a 0.75-mile radius of the Project Site). As the City is currently working on updating the Palms–Mar Vista–Del Rey Community Plan, it is anticipated that much of this growth will be incorporated into the updated Community Plan. To this end, one of the concepts of the updated Community

Plan is to provide more open space and better access to parks that will enhance active and passive recreation opportunities and meet shade and other health and safety needs of the community.⁸ In addition, there are a number of parks and recreational facilities within a 2-mile radius of the Project Site, as listed in Table IV.J.4-2 on page IV.J.4-18, that would be available to serve new residents in the community. All 14 identified related projects fall within this 2-mile radius, which is the geographic area analyzed for purposes of assessing impacts to parks and recreational facilities. Furthermore, as with the Project, other residential or mixed-use residential projects proposed would be required to provide a certain amount of open space to comply with the requirements of the LAMC, as recently amended by the City's current Park Fee Ordinance, which would help offset the demand for parks and recreational facilities generated by the related projects. Additionally, as with the Project, the related projects would undergo discretionary and CEQA review on a case-by-case basis and would be expected to coordinate with the Department of Recreation and Parks regarding the provision of open space. **Therefore, based on compliance with applicable regulatory requirements, the Project and related projects would not result in significant cumulative impacts associated with the provision of new or physically altered government facilities (i.e., parks), need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, the Project's contribution would not be substantial, and cumulative impacts on parks and recreational facilities would be less than significant.**

(2) Mitigation Measures

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

(3) Level of Significance After Mitigation

Cumulative impacts related to parks and recreation were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

⁸ City of Los Angeles, Department of City Planning. *Planning the Westside—Draft Concepts for Westside Plans webinars, Draft Land Use Concepts, Westside Community Plans Update webinar presentation.*