

IV.K.4 RECREATION AND PARKS

1. INTRODUCTION

The Project site is located within the Silver Lake-Echo Park-Elysian Valley Community Plan Area (Plan Area) of the City of Los Angeles, which owns and operates parks and recreational facilities throughout the City. This section evaluates the availability of parks and recreational facilities in the Project area and potential impacts of the proposed Project on those facilities, as well as Project consistency with City plans and policies applicable to these resources. Analysis is based on information contained in the General Plan, including the Land Use Element (Community Plans), Conservation Element, and Service Systems Element (Public Recreation Plan); the LAMC; and consultation with the City of Los Angeles Department of Parks and Recreation.

2. REGULATORY FRAMEWORK

a. State Regulations

California Government Code Section 66477, the Quimby Act of 1975, authorizes cities and counties to adopt ordinances requiring, as a condition of approval, the dedication of land, donation of easements, or payment of in-lieu fees for park lands and recreational facilities, by developers of residential subdivisions. Land, easements, and fees must be conveyed to the governing public agency responsible for park lands in the project community and may be used only for acquiring or developing (not maintaining or operating) public park lands and recreational facilities. Amendments enacted in 1982 to the Quimby Act established standards for ratios of park land acreage to population and formulae for determining fees, and required that fees be proportionate to a project's impacts. The Quimby Act states that the dedication of land, payment of fees, or both, is not required to exceed 3 acres of park area per 1,000 project residents, unless that ratio has already been exceeded in the community.

b. Local Regulations

The following discussion summarizes City of Los Angeles standards governing park lands and recreational facilities.

i. City of Los Angeles Municipal Code

Open Space Requirement

The Los Angeles Municipal Code (LAMC) establishes minimum open space requirements for residential subdivisions within the City of Los Angeles. As stated in LAMC Section 12.21(G), new construction of six or more dwelling units is required to provide a minimum of 100 square feet of “usable open space” for each dwelling unit with less than three habitable rooms; 125 square feet for each dwelling unit with three habitable rooms; and 175 square feet for each dwelling unit with more than three habitable rooms.

Open space is generally intended to serve a number of purposes for the residents of a project site, including providing opportunities for outdoor living and recreation; safe play areas for children; improved aesthetic character through the use of visual relief to the massing of buildings, landscaping, and reduced lot coverage; increased natural light and ventilation; and improved pedestrian circulation and access to on-site recreation facilities.

LAMC Section 12.21(G) defines usable open space as areas designed and intended for active or passive recreation, including community or private areas. Common open space areas must be a minimum of 400 square feet, open to the sky; must incorporate recreational amenities (such as swimming pools, spas, picnic tables, benches, children’s play areas, ball courts, barbecue areas, or sitting areas); and must be at least 50 percent of the total open space provided. Finally, a minimum of 25 percent of the common open space area is to be planted with ground cover, shrubs, or trees, and at least one 24-inch box tree is required for every four dwelling units. Parking areas, driveways, or required front and side yard setbacks do not qualify as usable open space.

Private open space is defined as an area contiguous to and immediately accessible from an individual dwelling unit, with dimensions of no less than six feet in any direction and a minimum of 50 square feet in area.¹ No more than 50 square feet of private open space per dwelling unit can be counted towards the total open space requirement.

Quimby Fees

To implement the Quimby Act, the City of Los Angeles established the Subdivision Fees Trust in 1971 (LAMC Section 17.12).^{2,3} Under this ordinance, residential subdivisions within the City of Los

¹ Per LAMC Section 12.21(G)(2)(b)(2)(ii), in developments built in the RAS4 zone, private open space may be provided above the first habitable room level, with no horizontal dimension less than six feet.

² City of Los Angeles, Department of Recreation and Parks. <http://www.laparks.org/planning/quimby.htm>. 2010.

Angeles are required to provide local park land to serve project residents, pay a fee in lieu of the provision of such park land, or a combination of the above. Park land can only be dedicated, or in-lieu funds spent, within the geographic service area of a project site, to assure that they will serve the project's residents. The geographic service area is defined in LAMC Section 17.12 as a one- to two-mile radius from the project site, consistent with the City's Public Recreation Plan, a part of the General Plan Service System Element, which establishes the service radius of neighborhood parks as one mile and the service radius of community parks as two miles (see the subsection entitled *Service Systems Element: Public Recreation Plan*, below, for further discussion). The need for land dedication or in-lieu fee payment, and calculation of the appropriate amounts, are determined by the Department of City Planning. Fees are payable to and administered by the City's Department of Recreation and Parks.

Where private park and recreational facilities are provided in a proposed subdivision and such facilities are to be privately owned and maintained by future residents of the subdivision, the total areas provided may be credited to the developer to reduce the required dedication of land or payment of in-lieu fees for park and recreational purposes, as long as the City's Department of Recreation and Parks determines that "it is in the public interest to do so" and the private facilities actually reduce the need for project residents to use public facilities (LAMC Section 17.12.F).

Park Change Fees

Separately of the Subdivision Fees Trust, the City of Los Angeles established a Zone Change Park Fee in 1985 (LAMC Section 12.33).⁴ This ordinance states that the city may require the dedication of land or payment of in-lieu fees for park land or recreational facilities as a condition of approval before a zone change permitting multiple residential uses on a property can be finally approved or building permits issued. Land dedication and in-lieu fee payment are subject to the restrictions set forth in LAMC Section 17.12 (i.e., land must be used for park or recreational uses and fees must be used for the acquisition or development, not operation or maintenance of, park land).

Together, the Park Change Fees and Quimby Fees constitute the City's "Quimby Code."

³ LAMC Section 17.12, Park and Recreation Site Acquisition and Development Provisions.

⁴ LAMC, Section 12.33, Dedication of Land or Payment for Park and Recreational Facilities as a Requirement for a Zone Change for a Multiple Residential Use in Any Multiple Residential or Commercial Zone.

Parkland Fees

LAMC Section 21.10.3(a)(1), the Dwelling Unit Construction Tax, imposes a fee of \$200 per dwelling unit on all newly constructed units or modifications of existing units, payable to the Department of Building and Safety. These fees are placed in a “Park and Recreational Sites and Facilities Fund” used exclusively for park lands and recreational sites and are used to fund capital improvements, upgrade existing facilities, or acquire and develop park lands or recreational facilities.

Parkland fees may be reduced if a developer has already dedicated land, donated an easement, or paid in-lieu fees in satisfaction of the City’s Quimby Code requirements. The amount of the reduction, or credit against parkland fees, takes into account fees already paid, the fair market value of land dedicated, or the value of the improvements or recreational facilities installed, constructed or guaranteed, or a combination of the above. LAMC Section 21.10.3(b) contains detailed guidance concerning the calculation of parkland fees and credits, including land valuation.

ii. City of Los Angeles General Plan

The City of Los Angeles Department of Recreation and Parks has established three standards for measuring the adequacy of a park and recreation system: (1) sufficient land area reserved for parks and recreation; (2) appropriate distribution of park and recreation facilities throughout the City; and (3) a full range of park and recreation facility types (i.e., active and passive recreation for all age groups) to accommodate a wide variety of users.⁵ Facilities are to be provided at the neighborhood, community, and regional levels.

Three elements of the General Plan, the Framework Plan, Service Systems Element (including the Public Recreation Plan) and Land Use Element (including the individual Community Plans), recommend planning efforts and activities related to parks, recreation facilities, and open space areas in the City. The Public Recreation Plan provides Citywide goals, objectives, and recommendations concerning parks and recreation facilities, while The Community Plans sets forth goals, objectives, and recommendations for parks and recreation facilities in each of the City’s 35 Community Plan Areas.

Framework Element

The Framework Element is intended to provide a comprehensive vision or strategy for long-term growth within the City. Originally adopted in 1996 and most recently updated in 2001, the

⁵ City of Los Angeles, Service Systems Element, Public Recreation Plan, (1980), 2

Framework Element was developed to guide subsequent amendments of the City's Community Plans, Specific Plans, zoning ordinances, and other local planning programs, although it does not supersede the more detailed Community and Specific Plans. The General Plan Framework contains chapters addressing Land Use, Housing, Urban Form and Neighborhood Design, Open Space and Conservation, Economic Development, Transportation, and Infrastructure and Public Services.⁶

Both the Open Space and Conservation chapter and Infrastructure and Public Services chapter address recreational facilities and parks. The Open Space and Conservation Chapter: calls for the distribution of recreational facilities throughout the City; encourages the connection of neighborhoods by open space and open recreational facilities; encourages increases in parks where deficiencies exist; and encourages the development of public plazas, forested streets, green space, pathways, and other recreational amenities in new development. The Infrastructure and Public Services Chapter calls for sufficient and accessible parkland and recreation opportunities in every neighborhood to give all residents the opportunity to enjoy green spaces, athletic activities, social activities and passive recreation; monitor and report appropriate park and recreation statistics and compare with population projections and demand to identify the existing and future recreation and park needs of the City; and phase recreational programming and park development with growth.⁷

Service Systems Element: Public Recreation Plan

The Public Recreation Plan, part of the Service Systems Element of the City's General Plan, was adopted in 1980 by the City Council. The Public Recreation Plan focuses on physical facilities by emphasizing the provision of neighborhood and community recreation sites, community buildings, gymnasiums, swimming pools, and tennis courts. The Public Recreation Plan largely focuses on planning in residential areas, since residential uses generate the greatest demand and need for parks and recreational facilities. The Public Recreation Plan also establishes general locations for future facilities based on a proposed service radius and projected population levels.

The Public Recreation Plan defines three types of parks, or "recreational sites", within the City: neighborhood, community, and regional. It also defines the minimum and ideal size of each park type as well as long-range and short/intermediate-range standards for park allocation and location, in recognition of the fact that the long-range plans may not be achieved during the life of the Plan. Each is discussed below.

⁶ City of Los Angeles General Plan, *Citywide General Plan Framework Element*, 2001.
<http://cityplanning.lacity.org/cwd/framwk/chapters/title.htm>; accessed February 2012.

⁷ City of Los Angeles General Plan, *Citywide General Plan Framework Element*, 2001.
<http://cityplanning.lacity.org/cwd/framwk/chapters/title.htm>; accessed February 2012.

IV.K.4 Recreation and Parks

It should be noted that these standards are intended as City-wide goals and not requirements for individual development projects. The Public Recreation Plan recommends the City-wide provision of 10 acres of total park land and recreational facilities per 1,000 residents, including all park types. Further, the Public Recreation Plan recommends a minimum of 10 percent of the City's total land area be dedicated to public recreation or open space.⁸

Neighborhood Parks

Neighborhood parks are intended to provide space for indoor and outdoor activities, typically including ball fields, hard courts, game tables, and children's play areas. Specific activities and programs at neighborhood parks are to be determined by the needs of the users in the specific neighborhood served, and are to serve all age groups. The Public Recreation Plan's acreage standard for neighborhood parks is a minimum of five (5) acres and ideally 10 acres, with a minimum allocation of two (2) acres of parkland per 1,000 residents. The long-range service radius standard, or maximum desirable walking or travel distance from residences served, is defined as .50 miles; the short/intermediate-range standard is one (1) mile. Neighborhood parks are to be located within a neighborhood such that users are not required to cross a major arterial street or highway to reach the park.⁹

Community Parks

Community parks are intended to serve multiple neighborhoods within a community and accommodate a broader range of activities, with facilities such as baseball diamonds, football/soccer fields, tennis and handball courts, and a swimming pool. Specialized facilities may be appropriate to meet a specific community's needs. The acreage standard for community parks is a minimum of 15 acres and ideally 20 acres, with a minimum allocation of two (2) acres per 1,000 persons within the service radius. Both the long-range and short/intermediate-range service radius standards are two (2) miles. Community parks are meant to be easily accessible to the communities they serve.

Regional Parks

Regional parks provide specialized resources or facilities, such as wilderness areas, beaches, lakes, campgrounds, and golf courses, and typically contain and emphasize scenic attractions. Regional parks may also contain the same recreational amenities found in neighborhood and community

⁸ City of Los Angeles, General Plan: Service Systems Element–Public Recreation Plan, 3.

⁹ City of Los Angeles, General Plan: Service Systems Element–Public Recreation Plan, 3.

parks. Regional parks are generally greater than 50 acres in size and those in the City of Los Angeles are intended to serve the entire Los Angeles basin.

Conservation Element

The Conservation Element of the Los Angeles General Plan primarily addresses the City's undeveloped, natural open space, citing its importance to the protection of such diverse resources as scenic views, habitat preservation, agriculture, mineral resources, archaeological and paleontological resources, and others. In contrast, the Service Systems Element's Public Recreation Plan focuses on human use of parks and recreational facilities and the Open Space Element focuses on all forms of open space, natural and urbanized.

As discussed in the Conservation Element, "open space" is a broad term that can include virtually anything from a sidewalk or lawn to the mountains and ocean. It is defined by the California General Plan Law (Government Code Section 65560) as "any parcel or area of land or water that essentially is unimproved and devoted to an open-space use," whether for preservation and protection of natural resources or for human activity.¹⁰ Therefore, streets or public rights-of-way improved with planting, paving, lighting, signage, and furnishings act as pedestrian-friendly, open space corridors.

Conservation Element policy applicable to the proposed Project is further discussed in **Section IV.H, Land Use**, of this Draft EIR.

Silver Lake-Echo Park-Elysian Valley Community Plan

The Silver Lake-Echo Park-Elysian Park Valley Community Plan is one of 35 Community Plans in the City of Los Angeles. Together, they comprise the Land Use Element of the City's General Plan.

The Silver Lake-Echo Park-Elysian Valley Community Plan addresses recreational park resources within the Plan Area through goals, objectives, and policies pertaining to the preservation of existing recreational facilities and park space, the creation of new such facilities, and the preservation of stairways and other public rights-of-way that could link existing green spaces within the Plan Area. These policies are further discussed in **Section IV.H, Land Use**, of this Draft EIR.

¹⁰ City of Los Angeles General Plan, Conservation Element, (2001), II-56.

iii. Department of Recreation and Parks Communitywide Needs Assessment

A survey of Citywide park land and recreational facilities and needs was prepared for the City’s Department of Recreation and Parks in 2009, entitled the *City of Los Angeles Department of Recreation and Parks Communitywide Needs Assessment*. The report provides a more current assessment of conditions than the General Plan Service Systems Element’s Public Recreation Plan.

Based on the existing supply of parks and recreational facilities as well as the estimated population within the City, the *Communitywide Needs Assessment* recommends desired service levels of 9.60 acres of park lands per 1,000 persons, including (per 1,000 persons) 0.10 acres of mini-parks, 1.50 acres of neighborhood parks, 3.00 acres of community parks, and 6.0 acres of regional and large urban parks.¹¹ Actual service levels as of 2009 are summarized in **Table IV.K.4-1, Current Service Levels for City of Los Angeles Parks**.

**Table IV.K.4-1
Current Service Levels for City of Los Angeles Parks**

Type	Overall Acreage
Mini	0.013 acres per 1,000 persons
Neighborhood	0.198 acres per 1,000 persons
Community	0.759 acres per 1,000 persons
Regional	8.261 acres per 1,000 persons
Total	9.231 acres per 1,000 persons

Source: *City of Los Angeles Department of Recreation and Parks, Community-Wide Needs Assessment: Summary, (2009), 63.*

iv. Elysian Park Master Plan

The Project site is located immediately south of the Stadium Way/Scott Avenue entrance to Elysian Park, a 765-acre City-owned regional park. Dedicated in 1886 as the City’s first park, Elysian Park marks the easternmost extent of the Santa Monica Mountains and is generally characterized by wooded, steep slopes and ravines, with broad meadows or lawn areas running through the center of the park and on higher plateaus created on former landfill. The park contains a network of hiking and equestrian trails and scenic overlooks.

¹¹ City of Los Angeles, Department of Recreation and Parks, *Community-Wide Needs Assessment: Summary, (2009), 63.*

The park encompasses a number of specialized facilities and recreational amenities, including Elysian Fields (baseball fields and picnic areas); Solano Canyon (practice fields, tennis courts, play structures, and picnic areas); Leo Politi Picnic Area (practice ball fields, tennis courts, volleyball court, and picnic areas); the Adaptive Recreation Center; Chavez Arboretum; and others. A non-contiguous part of the park, Victory Memorial Grove, a World War I memorial, occupies several acres southwest of the Project site. Elysian Park also contains the City-owned Elysian Park reservoir, operated by the Department of Water and Power, and the Los Angeles Police Academy, a training facility originally established in 1920s as a public target range that presently occupies 21 acres of former park land off Academy Road.

The first Elysian Park Master Plan was adopted in 1971 and contains a general recommendation for traffic speed control measures such as signalization within the park along Stadium Way and at the intersection of Elysian Park Drive and Scott Avenue, northwest of the Project site, to reduce vehicular-pedestrian conflicts.¹²

A Master Plan update drafted in 2006, although not yet adopted, recommends several “Action Items” for future park improvements.¹³ Under “Roads and Traffic”, the draft Master Plan recommends modifying Stadium Way within the park, between Academy Road on the south and the park’s northern entrance near Riverside Drive, to provide pedestrian access from Elysian Valley, increase park user safety, reduce vehicle speeds, and improve the visual character of the road corridor through the park. It also specifically recommends reducing the six-lane Stadium Way by two lanes within the park to accommodate bicycle lanes and a pedestrian walkway.

Under “Trails, Crossings, and Stairways”, the draft Master Plan recommends connecting trails within the park to existing or future trails and access points outside the park. A ridgeline trail is proposed that follows the alignment of Elysian Park Drive along the western edge of the Project site.

The Master Plan notes that a pedestrian crossing at any location on Academy Road has been determined by the City’s Department of Transportation to be hazardous because of the offset configuration of the intersection of Academy Road and Stadium Way, and that these arterials remain difficult to cross for pedestrians.

¹² City of Los Angeles, Department of Recreation and Parks, *Elysian Park Master Plan* http://www.laparks.org/dos/parks/elysianPK/1971_masterplan.htm. 1971.

¹³ City of Los Angeles, Department of Recreation and Parks, *Draft Elysian Park Master Plan*. <http://www.laparks.org/dos/parks/elysianPK/elysianMasterplan.htm>. 2006.

IV.K.4 Recreation and Parks

Finally, under “Signs – Wayfinding, Location Identification and Trail Markers”, the draft Master Plan recommends that the southern entrance to the park, at the intersection of Stadium Way and Scott Avenue, be formally identified with signage; currently, no signage appears until further north within the park at Stadium Way and Academy Road. The draft Master Plan also recommends pedestrian access to the park be improved at this location.

3. EXISTING CONDITIONS

The City of Los Angeles Department of Recreation and Parks owns and operates approximately 15,710 acres of public parks and recreation facilities within the City. The Department oversees 39 neighborhood and regional parks, 9 lakes, 178 recreation centers, 9 dog parks, 7 skate parks, 13 golf courses, 63 swimming pools, and 27 senior centers.¹⁴ The Department also oversees afterschool and daycare programs for children, teen clubs, basketball, volleyball, softball, and flag football games and leagues. Including County-owned land, parks and open space within the City exceed 36,000 acres.¹⁵ As indicated in **Table IV.K.4-1**, the City’s current Citywide park to population ratios are 0.13 acres per 1,000 persons for mini parks, 0.198 acres per 1,000 persons for neighborhood parks, 0.759 acres per 1,000 persons for community parks, and 8.261 acres per 1,000 persons for regional parks, for a total of 9.231 acres of parkland per 1,000 persons.

In addition, the Department oversees the operation of special venues and activity centers and supervises volunteer opportunities, youth activity and sports programs, historic sites, museums, banquet facilities, beaches, horticulture centers, and gardens.

The 2008 total residential population of the Silver Lake-Echo Park-Elysian Valley Community Plan Area was estimated to be 82,014 persons.¹⁶ The Community Plan states that approximately 35 percent, or 1,600 acres, of the Plan Area’s 4,579-acre area is designated as park land.¹⁷ Taken as a ratio, this equates to approximately 19.50 acres of land designated for park use per 1,000 residents within the Community Plan area, although not all of the acreage designated for park use in the Community Plan area is actually developed with park uses (e.g., Dodger Stadium, Silver Lake Reservoir, and the Project site).

The largest park in the Plan Area is Elysian Park, a regional park immediately north of the Project site. There is also a community park (Echo Park) in the Plan Area, and a number of neighborhood

¹⁴ City of Los Angeles, Department of Recreation and Parks, *A Message from the General Manager*, <http://www.laparks.org>. 2008.

¹⁵ City of Los Angeles, Department of Recreation and Parks, *Communitywide Needs Assessment*. 2009

¹⁶ City of Los Angeles, Department of City Planning, Demographics Research Unit, *Local Area Profile*, (2009).

¹⁷ City of Los Angeles, Silver Lake–Echo Park–Elysian Valley Community Plan, (2004), III-35.

parks and “mini-parks”, or pocket parks. The City’s Department of Recreation and Parks has proposed an 18-acre community park west of Riverside Drive and south of the junction of the Glendale (SR-2) and Golden State (I-5) freeways. Two other parks are planned nearby on former industrial lands outside the Plan Area: the Cornfields property to the southeast and Taylor Yards, across the Los Angeles River in the Northeast Community Plan Area. Finally, Silver Lake and Echo Park have a unique collection of 36 largely wooden or concrete public staircases originally built into the area’s hillsides to provide access for residents to major streets and the Pacific Electric rail lines (no longer in use).

City parks and recreational facilities located within the Plan Area are summarized in **Table IV.K.4-2, Parks and Recreational Facilities in the Silver Lake–Echo Park–Elysian Valley Community Plan Area**. Also within the Plan Area, the Santa Monica Mountains Conservancy has developed seven pocket parks in the Elysian Valley neighborhood, some in partnership with local organizations, as part of the Los Angeles River Greenway network.¹⁸ Assuming that, in addition to Echo and Everett Parks, the recreation centers and other parks, open space and recreational facilities identified in **Table IV.K.4-2** fall within the community and neighborhood park categories, this equates to 34.65 acres of existing community and neighborhood parkland, or 0.42 acres per 1,000 residents, within the Silver Lake-Echo Park-Elysian Valley Community Plan area.¹⁹ Based on the Department of Recreation and Park’s allocation goal of two acres each of community and neighborhood parkland per 1,000 residents, the Community Plan area is recommended to have 164 acres of community and neighborhood parkland.

Parks and recreational facilities within the Plan Area and within two (2) miles of the Project site are shown in **Figure IV.K.4-1, Existing Parks and Recreational Facilities Serving the Project Site**.

As discussed in **Section II, Project Description** and **Section IV.H, Land Use**, of this Draft EIR, the Project site is designated by the Silver Lake-Echo Park-Elysian Valley Community Plan as Open Space, and is zoned A1-1VL, Agriculture. It should be noted, however, that the Project site has been developed with a hospital since 1902. (albeit lightly developed and containing areas of undeveloped land. The Project site has not historically been, and is not currently, developed with parkland, and is not part of any regional park.

¹⁸ Los Angeles Council District No. 13, Parks and Green Space in Council District 13, <http://www.ci.la.ca.us/council/cd13/cd13parks.htm>, 2010; City of Los Angeles, Department of Public Works, Bureau of Sanitation, Orso Green Street Project, <http://www.lastormwater.org/siteorg/events/Oros/oros.htm>, 2010.

¹⁹ Assuming that recreational centers and “Other Parks, Open Space and Recreational Facilities” fall within the community and neighborhood parks categories is a reasonable assumption, because per LAMC Section 17.12, such amenities can be used to offset City park dedication and Quimby Fee requirements.

IV.K.4 Recreation and Parks

**Table IV.K.4-2
Parks and Recreational Facilities in the Silver Lake–Echo Park–Elysian Valley Community Plan Area^a**

Facilities	Address	Miles from Project Site	Acreage	Facilities and Amenities
Regional Parks				
Elysian Park	835 Academy Road	Adjacent	765	Major facilities and amenities are listed below.
Leo Politi Picnic Area	On Stadium Way between Scott Avenue and Academy Road	0.2		Barbecue pits, picnic tables, restroom, tennis courts, benches, electricity ready, grass area, hiking trails, horseshoe pit, softball backstop
Chavez Ravine Arboretum	West side of Stadium Way near Grace E. Simons Lodge	0.5		Barbecue pits, children’s play area, picnic tables, restrooms, benches
Elysian Park Therapeutic Recreation Center	929 Academy Road	0.7		Barbecue pits, basketball courts, children’s play area, indoor gym, picnic tables, amphitheater, gymnasium (1/2 court), hiking trails, and a stage
Bishop Canyon	929 Academy Road	0.7		Barbecue pits, baseball diamond, children’s play area, picnic tables, restrooms, landscaped rolling hills, large grass area, lookout points, walking trail
Victory Memorial Grove	Elysian Park Drive	Adjacent	N/A	World War I memorial, trails
Community Parks				
Echo Park	1632 Bellevue Avenue	1.5	33	Facilities include Echo Park Lake, Echo Park Recreation Center, Echo Park Shallow Pool, and Echo Deep Pool. Amenities include barbecue pits, baseball diamond, basketball courts, children’s play area, community room, football field, indoor gym, picnic tables, indoor & outdoor pools, soccer field, tennis courts, boathouse, lake w/fishing, paddle boats, and stage.
Neighborhood Parks				
Everett Park	Everett Street	0.25	6.68	Grassy play area
Recreation Centers				
Elysian Valley Recreation Center	1811 Ripple Street	2.2	N/A	Auditorium, barbecue pits, baseball diamond (lighted), basketball courts (lighted/indoor), children’s play area, community room, handball courts (unlighted), indoor gym (without weights), soccer field (lighted), volleyball courts (lighted).
Silver Lake Recreation Center	1850 W. Silver Lake Drive	2.8	1.25	Silver Lake Reservoir, jogging trail, children's play area, community room, indoor gym, picnic tables, off-leash dog park.

Table IV.K.4-2
Parks and Recreational Facilities in the Silver Lake–Echo Park–Elysian Valley Community Plan Area^a

Facilities	Address	Miles from Project Site	Acreage	Facilities and Amenities
Bellevue Park Recreation Center	826 Lucile Avenue	3.2	N/A	Auditorium, barbecue pits, baseball diamond (unlighted), basketball courts (lighted/outdoor), children's play area, community room, football field (unlighted), indoor gym/auditorium, picnic tables.
Other Parks, Open Space, and Recreational Facilities				
Tommy Lasorda Field of Dreams	1901 Waterloo Street	1.7	1.8	Baseball diamond (managed as part of the Silver Lake Recreation Center)
Laurel & Hardy Pocket Park/Del Monte Triangle	Del Monte Avenue	2.2	N/A	Open space
Larissa Parkway	3305 Larissa Drive	2.3	N/A	Open space
Elysian Valley Gateway Pocket Park	2914 Knox Avenue	2.4	N/A	Open space, riverfront access (operated by the Santa Monica Mountains Conservancy)
Oros Green Street Pocket Park	Oros Street between Blake Street and the Los Angeles River	2.5	N/A	Open space, riverfront access, stormwater pollution prevention (operated by the Santa Monica Mountains Conservancy)
Meadowvale Pocket Park	Meadowvale Drive at the Los Angeles River	2.6	N/A	Open space, seating, riverfront access (operated by the Santa Monica Mountains Conservancy)
Egret Pocket Park	Barclay Street at the Los Angeles River	2.6	N/A	Open space, riverfront access (operated by the Santa Monica Mountains Conservancy)
Oso Pocket Park	Riverside Drive at Barclay	2.6	N/A	Native plant garden, riverfront access (operated by the Mountains Recreation and Conservation Authority)
Rattlesnake Park	Ripple Street at Fletcher Drive	2.8	N/A	Open space, seating, riverfront access (operated by the Mountains Recreation and Conservation Authority)
Marsh Street Nature Park; Marsh Street Skate Park	2960 Marsh Street	3.0	N/A	Open space, riverfront access, stormwater pollution prevention, youth skate park facilities (Nature Park operated by the Mountains Recreation and Conservation Authority; Skate Park managed by the Los Angeles Neighborhood Trust)

Sources: City of Los Angeles Department of Recreation and Parks. <http://www.laparks.org>. 2008; Los Angeles Council District No. 13, Parks and Green Space in Council District 13, <http://www.ci.la.ca.us/council/cd13/cd13parks.htm>, 2010; City of Los Angeles Department of Public Works, Bureau of Sanitation, Oros Green Street Project, <http://www.lastormwater.org/siteorg/events/Oros/oros.htm>, 2010.

^a All facilities owned and operated by the City of Los Angeles except where otherwise noted.

4. ENVIRONMENTAL IMPACT ANALYSIS

a. Methodology

The evaluation of potential Project impacts on City parks, recreational services and facilities, and open space was determined by calculating the increase in demand for such facilities generated by proposed Project residents; defining and quantifying Project site recreational amenities; and determining the remaining Project-related demand for City parks and recreational facilities. The proposed Project is also evaluated for consistency with applicable regulations, plans, and policies governing parks and recreational facilities as well as open space, including the Zoning Code and General Plan.

b. Significance Thresholds

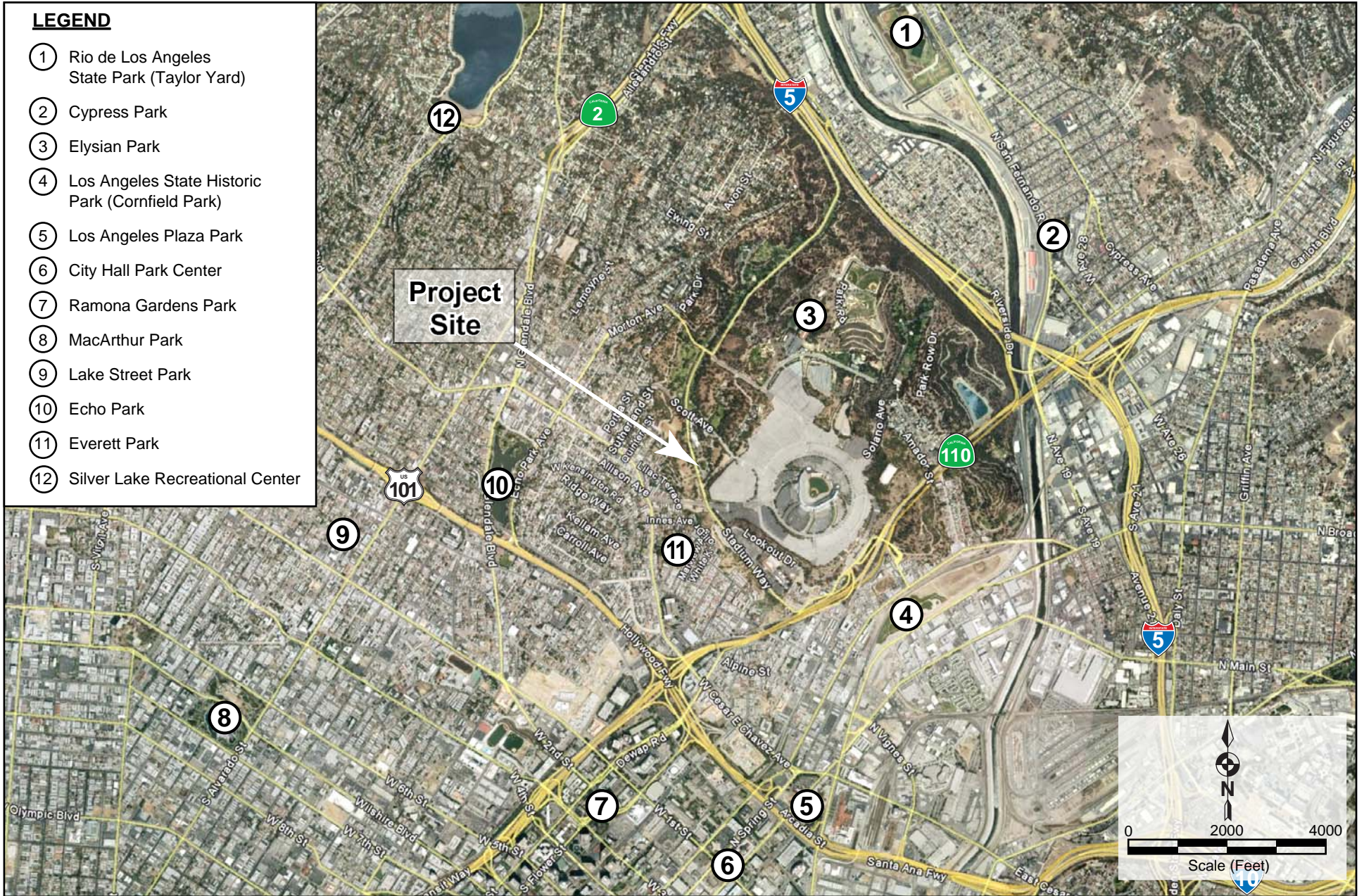
Appendix G of the State *CEQA Guidelines* provides sample checklist questions for use in an Initial Study to determine a project's potential for environmental impacts. According to the applicable question²⁰ contained in Appendix G under Section XIV, Public Services, a project would have a potentially significant impact on parks if it would:

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

The *City of Los Angeles CEQA Thresholds Guide* states that the determination of a project's significance to recreation and park services shall be made on a case-by-case basis, considering the following factors:

- The net population increase resulting from the proposed project;
- The demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled

20 The remainder of the Appendix G Public Services sample questions (XII.a.ii, -iii, -iv, and -v) pertain to police protection, schools, parks, and other public facilities, respectively. Police protection is addressed in **Section IV.J.1, Police Protection**. The Initial Study prepared for the proposed Project determined that the proposed Project would have no impact with regard to Section VIII Public Services sample questions XIII.a.iii and -v, which pertain to schools and other public facilities. The responses to these questions are discussed in **Section VII, Effects Found Not to be Significant**. The Initial Study is provided in **Appendix I**.



Source: City of Los Angeles Department of City Planning - March 2010.

Figure IV.K.4-1
Parks and Recreation Facilities Serving the Project Site

IV.K.4 Recreation and Parks

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 recreation 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 Appendix G of the State *CEQA Guidelines* and the *City of Los Angeles CEQA Thresholds Guide*, the proposed Project would have a significant impact on recreation and park services if:

REC-1 The Project generates demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities or services.

c. Project Design Features

i. Open Space

A total of 8.8 acres of open space is proposed throughout the Project site in different forms, including areas intended for passive and active recreation. Proposed open space is intended to complement the proposed residential and hospital uses and buffer these uses from one another; provide views into the Project site from Stadium Way as well as views of off-site scenic resources from the Project site; and reflect the park-like character of the existing Project site and adjacent Elysian Park. The Project's guiding principles for the development of open space include creating welcoming and usable outdoor spaces, and maintaining and enhancing pedestrian access and connections to adjacent parkland and neighborhoods.

The majority of proposed open space on the Project site would be contained in the proposed Historical Parcel on the eastern Project site and proposed Parcel 13 on the western Project site, with smaller open space areas integrated into the remaining residential parcels as described below.

The proposed Historical Parcel would retain nine (9) of the existing historically significant buildings and some of the original landscape features, in a parcel totaling 2.13 acres. Approximately 1.50 acres would remain as open space in this parcel and would include pedestrian walkways, lawn areas, and ornamental plantings. This parcel would serve as a major open space feature of the Project site and would preserve existing views into the property from Stadium Way, as discussed in **Section IV.A.1, *Aesthetics and Views***, of this Draft EIR.

IV.K.4 Recreation and Parks

Proposed Parcel 13 on the western Project site is the largest single parcel at approximately 6.6 acres and encompasses most of the steep slope between the residential parcels lining Stadium Way and Elysian Park Drive, at the top of the slope. The two existing on-site single-family residences on Elysian Park Drive would be retained, and three townhome buildings housing a total of 18 units, with attached garage parking, would be constructed adjacent to the existing residences. The remainder of the proposed parcel, approximately 5.50 acres, would remain as landscaped but otherwise undeveloped open space.

Additional open space to be incorporated into the other proposed parcels would total 1.80 acres and would be developed with the recreational amenities described below.

ii. Recreational Amenities

Of the 8.80 acres of open space proposed as part of the Project, approximately 1.80 acres would be developed with outdoor amenities for active recreational use including: two children's playgrounds totaling 0.50 acres; communal gardens totaling 0.75 acres; and hard courts for basketball and handball, tennis courts, a central swimming pool, and two jacuzzis/spas totaling approximately 0.55 acres. Other outdoor amenities would include walkways or paseos, walking trails, bicycle paths, and hillside stairs similar to those found throughout Echo Park, although these are not included in the acreage calculation of active recreational uses.

Also proposed are indoor active recreational facilities totaling approximately 7,000 square feet (0.16 acres) within each of the proposed residential building complex. These would include such facilities as: fitness centers and gym equipment; facilities for offering classes such as yoga, nutrition, and fitness; a community room for use by Project residents; a kitchen; and a media room.

Although not included in the calculation of open space or recreational amenities for purposes of determining compliance with LAMC requirements, the buildings to be retained for adaptive reuse within the Historical Parcel would remain under the ownership of the hospital and would be adapted to house staff offices as well as cultural, recreational, and other programs and facilities for use by the hospital community, Project residents, and the Echo Park community. Approximately 1,500 square feet of space within these buildings would be made available for community use.

d. Project Impacts

- REC-1 Would the proposed Project generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities or services?

Implementation of the proposed Project would result in a net increase of 888 dwelling units on the Project site. Project implementation would necessitate a General Plan Amendment to amend the land use designation of the Project site from Open Space to Low Density Residential, High Medium Density Residential, and Neighborhood Commercial, as well as a Zone Change from Agricultural to Residential. The Project site is currently privately owned and occupied by Barlow Respiratory Hospital and is developed with the hospital and ancillary uses. Project implementation would not remove any existing parks lands or recreational facilities, public or private.

The Project site is located within the Census Tract 1973.00, which is bordered by Academy Road to the north, Echo Park Drive to the west, Boylston Street and Stadium Way to the east, and Elysian Park Avenue and Sunset Boulevard to the south. Based on the 2000 Census, the average household size in Census Tract 1973 was approximately 2.78 persons.²¹ Consequently, the proposed Project would provide housing for approximately 2,469 residents (888 units * 2.78 persons per unit), which represents approximately a three percent increase in the existing Plan Area population of 82,014 persons. The replacement hospital, administration and support facility, and skilled nursing facility Project components would not introduce permanent residents to the Project site and, therefore, would not generate demand for park land or recreational services.

i. City of Los Angeles Municipal Code

The LAMC requirement for open space within residential subdivisions within the City of Los Angeles ranges from 100 square feet for units with less than three habitable rooms to 175 square feet for units with more than three habitable rooms. Conservatively assuming all proposed units would include more than three habitable rooms, the open space requirement for the proposed Project would be approximately 155,400 square feet or 3.57 acres, of which 50 percent or approximately 1.80 acres is required to incorporate recreational amenities.²² The Project proposes to provide a site-wide total of approximately 8.80 acres of open space, including approximately 1.50 acres in the Historical Parcel, 5.50 acres in Parcel 13, and 1.80 acres of outdoor open space

²¹ US Census Bureau, "2000 and 1990 Census, Quick Tables - American Fact Finder for Census Tract 1973, Los Angeles County, California," <http://factfinder.census.gov>. 2009.

²² 888 units * 175 square feet per unit = 155,400 square feet

IV.K.4 Recreation and Parks

throughout the Project site that would be developed with recreational amenities, as well as approximately 7,000 square feet (0.16 acres) of indoor recreational amenities, half of which may be considered in further fulfillment of the open space requirement. The proposed total of open space acreage and recreational amenities (8.80 acres) exceeds and therefore complies with the LAMC open space requirement for the Project site (3.57 acres). Accordingly, the open space impacts of the proposed Project would be less than significant.

The applicant would be required to comply with the LAMC Quimby Code, which requires the dedication of park land or payment of in-lieu fees (Quimby Fees) by applicants proposing residential subdivisions, and a Zone Change Park Fee, or Park Change Fee, as a condition of approval of a zone change permitting multiple residential uses on a property. As stated above, the proposed Project would include a site-wide total of approximately 8.8 acres of open space, including recreational facilities. The recreational facilities proposed would serve Project residents only, with the exception of community use space within the Historical Parcel, and would include most of the amenities found in public parks, excepting ballfields. Accordingly, proposed on-site open space and recreational facilities would reduce, though not entirely eliminate, the need for Project residents to use existing or planned public facilities. Still, without the payment of Quimby fees required to make up any shortfall in required park space, the impact would be significant.

The proposed Project is also subject to the LAMC Parkland Fee (Dwelling Unit Construction tax) requirement, which imposes a fee of \$200 per unit (for a total of \$177,600). Actual fees required may be reduced by the applicant's dedication of on-site open space for park land, the value of open space or recreational improvements provided, payment of fees in satisfaction of the City's Quimby Code, or a combination of these. With payment of these fees, the impact would be less than significant.

It should be noted that the Project site is designated by the Silver Lake-Echo Park-Elysian Valley Community Plan as Open Space, and is zoned A1-1VL, Agriculture. However, the Project site has been developed with a hospital since 1903, albeit lightly developed and containing areas of undeveloped land. While the proposed Project would redevelop the Project site with hospital and residential uses, thus eliminating the potential for its development with park uses in the future, this would not represent a significant recreation and parks impact because: (1) the existing hospital and residential use on the project site are grandfathered uses (e.g., existing uses to continue); and (2) the project site is not developed with existing parkland, and is not part of any park; and (3) the proposed Project would not eliminate existing park uses. Therefore, the proposed Project would

not indirectly create a demand for parkland, and the impact would be less than significant. See **Section IV.H, Land Use**, for analysis of this issue from a land use perspective.

ii. Public Recreation Plan

The neighborhood park land allocation contained in the General Plan Service Systems Element's Public Recreation Plan is 2 acres per 1,000 residents, with neighborhood parks ideally located between .50 miles and 1 mile from the residents they serve. The community park standard is also 2 acres per 1,000 residents, and no more than 2 miles from the communities they serve. The proposed Project would therefore generate demand for approximately 4.94 acres of neighborhood park land within one (1) mile of the Project site and 4.94 acres of community park land within two (2) miles of the Project site.²³ The nearest neighborhood park to the Project site is Everett Park which is 0.25 miles away, and the nearest community park is Echo Park, which is 1.5 miles away. In addition, Elysian Park, the regional park immediately north of the Project site, contains a number of park amenities and recreational facilities typically found in neighborhood and community parks, in addition to unique resources such as hiking and equestrian trails and scenic lookout points.

Since the Plan Area already provides more than the City Department of Recreation and Park's recommended acreage of park land and recreational facilities based on the resident population, and the Project site is adjacent to Elysian Park as well as within .50 miles of a neighborhood park and two (2) miles of a community park, the proposed Project would not contribute to an existing deficit in park land in the Project area. Moreover, the proposed Project would include substantial open space on-site, including passive and active recreational amenities for resident use, in addition to community facilities for use by Echo Park residents. For these reasons, Project implementation would not generate demand for park land or recreational facilities that could not be accommodated by existing off-site facilities, and impacts on such facilities would be less than significant.

iii. General Plan Conservation Element

Project consistency with General Plan Element goals, objectives, policies, and programs is evaluated in detail in **Section IV.H, Land Use**. As stated therein, the proposed Project would be partially consistent with the Conservation Element objective applicable to open space and recreational resources, which recommends the protection of natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of present and future generations, and with the related policy, which recommends the retention of significant existing land forms (e.g., ridge lines, bluffs, unique

²³ 2,469 residents * 2 acres per 1,000 residents = 2.469 * 2 = 4.94

IV.K.4 Recreation and Parks

geologic features) and unique scenic features (historic, ocean, mountains, unique natural features) and/or make possible public views or other access to unique features or scenic views. See **Section IV.H, Land Use**, for detailed discussion of Project consistency with the Conservation Element.

iv. Silver Lake-Echo Park-Elysian Valley Community Plan

Project consistency with Community Plan Element goals, objectives, policies, and programs is evaluated in detail in **Section IV.H, Land Use**. As stated therein, the proposed Project would be consistent with the goals, objectives, and policies applicable to parks and recreational resources, as well as with the goals, objectives, policies, and programs pertaining to open space resources. See **Section IV.H, Land Use**, for detailed discussion of Project consistency with the Silver Lake-Echo Park-Elysian Valley Community Plan.

v. Department of Recreation and Parks Community-Wide Needs Assessment

As previously discussed, the Community-Wide Needs Assessment recommends service levels of 9.60 acres of parkland per 1,000 persons Citywide, including (per 1,000 persons) 0.10 acres of mini-parks, 1.50 acres of neighborhood parks, 3.00 acres of community parks, and 6.0 acres of regional and large urban parks. The 1.80 acres of recreational amenities proposed under the proposed Project for the Projects 2,469 projected residents would partially meet these park recommendations because, per LAMC Section 17.12, recreational amenities can be counted towards City community and neighborhood parkland requirements.

However, the Community-Wide Needs Assessment is not a regulatory document, and compliance with its recommendations is not required. Furthermore, in accordance with LAMC Section 17.12, the Project will be required to dedicate parkland and/or pay Quimby Fees to meet City community and neighborhood parkland requirements (e.g., two acres each of community and neighborhood parkland per 1,000 project residents). Therefore, Project implementation will have a less than significant impact with respect to the recommended park service standards of the Community-Wide Needs Assessment.

vi. Elysian Park Master Plan

Although the Project site is private property and therefore the proposed Project is not governed by or subject to the Elysian Park Master Plan, several proposed Project features would be consistent with “Actions Items” defined in the draft 2006 Elysian Park Master Plan. The introduction of traffic calming measures along Stadium Way would slow the vehicular approach to the park north of the Project site. The proposed Project would also improve pedestrian access to the park at Stadium

Way and Academy Road through the introduction of a crosswalk across Scott Avenue, between the Project site and the Leo Politi Picnic Area to the north.

e. Mitigation Measures

No significant impacts were identified and no mitigation measures are required. However, the following measures are recommended to ensure compliance with the City’s Quimby Code.

- MM-REC-1 Pursuant to LAMC Section 17.12, the applicant shall pay the applicable Quimby fees for the construction of dwelling units.
- MM-REC-2 Pursuant to LAMC Section 12.33, the applicant shall pay the applicable Zone Change Park Fee Park Change Fee) as a condition of approval for the proposed zone change permitting multiple residential uses on the Project site.
- MM-REC-3 Pursuant to LAMC Section 21.10.3(a)(1), the applicant shall pay the Dwelling Unit Construction Tax of \$200 per dwelling unit for all newly constructed units, or the applicable fee after payment of Quimby fees and Park Change fees, to the City of Los Angeles Department of Building and Safety. A credit may be allowed against this tax to account for payment of Quimby or Park Change fees or to reflect the value of recreational improvements planned on the Project site.

f. Level of Significance After Mitigation

With implementation of the mitigation measures identified in this section, no significant impacts are anticipated as a result of the development of the proposed Project.

g. Cumulative Impacts

The 2008 total residential population of the Silver Lake-Echo Park-Elysian Valley Community Plan Area was estimated to be 82,014 persons.²⁴ The Community Plan states that approximately 35 percent, or 1,600 acres, of the Plan Area’s 4,579-acre area is designated as park land.²⁵ Taken as a ratio, this equates to approximately 19.50 acres of land designated for park use per 1,000 residents within the Community Plan area, although not all of the acreage designated for park use in the Community Plan area is developed with park uses (such as Dodger Stadium, Silver Lake Reservoir, and the Project site).

²⁴ City of Los Angeles, Department of City Planning, Demographics Research Unit, *Local Area Profile*, (2009).

²⁵ City of Los Angeles, Silver Lake–Echo Park–Elysian Valley Community Plan, (2004), III-35.

IV.K.4 Recreation and Parks

Assuming that, in addition to Echo and Everett Parks, the recreation centers and “Other Parks, Open Space and Recreational Facilities” identified in **Table IV.K.4-2** fall within the community and neighborhood park categories, this equates to 34.65 acres of existing community and neighborhood parkland, or 0.42 acres per 1,000 residents, within the Silver Lake-Echo Park-Elysian Valley Community Plan area.²⁶ Based on the Department of Recreation and Park’s allocation goal of two acres each of community and neighborhood parkland per 1,000 residents, the Community Plan area is recommended to have 164 acres of community and neighborhood parkland.

As discussed in **Section IV.J, Population, Housing & Employment**, the proposed Project plus related projects identified in **Section III, General Description of Environmental Setting**, would add approximately 10,288 new dwelling units and an estimated 29,447 residents Citywide. Some of the new residential units would be located within the Silver Lake–Echo Park–Elysian Valley Community Plan Area, increasing the population and demand for public recreational facilities and parks. According to the Citywide Community Needs Assessment, public parkland and open space within the City exceeds 36,000 acres.²⁷ Based on citywide inventories, the current citywide park acreage to resident ratio is 9.231 acres per 1,000 residents.²⁸ As with the proposed Project, effects on neighborhood and community parks from the increase in population generated by cumulative development would be mitigated on a case-by-case basis, with applicants proposing new residential development required to dedicate park land or easements or pay in-lieu fees. For these reasons, the proposed Project is expected to have a less than cumulatively considerable contribution with respect to demand for local and regional park land.

²⁶ Assuming that recreational centers and other parks, open space and recreational facilities fall within the community and neighborhood parks categories is a reasonable assumption, because per LAMC Section 17.12, such amenities can be used to offset City park dedication and Quimby Fee requirements.

²⁷ City of Los Angeles, Department of Recreation and Parks. *Communitywide Needs Assessment*, 22.

²⁸ Ibid.