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K.4 Public Services - Parks and Recreation

1. Introduction

This section addresses the potential impacts of the proposed Project on the demand for parks and recreational facilities, as well as the ability of existing and proposed parks and recreational facilities to accommodate any increase in demand resulting from the proposed Project. The analysis evaluates the Project’s proposed park system compared to City and County goals for local park space, regulatory requirements and existing service levels in the Project area. Areas credited as contributing to the Project’s park system include neighborhood/community parks and other areas that provide for recreational activities, such as bikeways and trails. The analysis addresses the impacts that would occur for the Project as proposed and for the Project’s cumulative impacts that would occur from the Project in combination with the identified related projects (see Section III.B of this Draft EIR).

The City of Los Angeles Department of Recreation and Parks and the County of Los Angeles Department of Parks and Recreation operate parks and recreational facilities within a two (2)-mile radius of the proposed Project Site. These facilities include regional parks, community parks, neighborhood parks, recreation centers, and amphitheaters.

388 A two-mile radius is used as it is anticipated that those who would use the facility would reside within that distance. This is consistent with guidance set forth in the City of Los Angeles CEQA Thresholds Guide (2006, page K.4-3).
2. Environmental Setting

a. Regulatory Framework

(1) State of California

The California Government Code, Section 66477 (Quimby Act) authorizes Cities and Counties to enact an ordinance which would require the dedication of land or payment of fees for park or recreational purposes for projects involving residential subdivisions. Quimby fees do not, however, apply to commercial or industrial subdivisions. The Quimby Act provides that the dedication of land, or the payment of fees, or both, shall not exceed the proportionate amount necessary to provide three (3) acres of park area per 1,000 persons residing within a subdivision, unless the amount of existing neighborhood and community park within the local jurisdiction (i.e., City or County of Los Angeles) area exceeds that limit.

(2) City of Los Angeles

(a) City Charter

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

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

According to the City of Los Angeles policies (discussed further below), a satisfactory park and recreation system should address standards in three respects: (1) sufficient land area reserved for parks and recreation; (2) appropriate distribution of park and recreation facilities throughout the City; and (3) a full complement of park and

389 California Government Code, Section 66477 (Quimby Act).
recreation facility types (i.e., active and passive recreation for all age groups) to accommodate a wide variety of users. Facilities should be provided at the neighborhood, community, and regional levels.390

Two sets of policy documents, the Public Recreation Plan, a portion of the Public Facilities and Services Element of the 1980 City of Los Angeles General Plan, and local plans (e.g., Community and Specific Plans), establish planning 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 local plans provide standards for each specific area of the City. The local Community Plan governing a portion of the Project Site is the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan (Community Plan). Most of the Project Site is an unincorporated area that is not reflected in the Community Plan’s land use policies. However, as a part of the incorporated portion of the Project Site is located in the Community Plan area and since the Community Plan includes goals and objectives that pertain to recreational facilities and open space, a brief summary has been included in the discussion of the City’s regulatory framework below.

(b) Los Angeles General Plan

The City’s General Plan Framework Element (adopted in August 2001) includes numerous park and open space policies which address recreation uses throughout the City. Of the numerous general policies, one policy in particular addresses recreation uses in more dense mixed-use development. Policy 9.23.5 directs the Department of Recreation and Parks to “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.” Another policy calls for the preparation of a planning document to guide park and recreation standards. Policy 9.23.8 instructs the Department of Recreation and Parks to “Prepare an update of the General Plan Public Facilities and Services Element based on the new Los Angeles Department of Recreation and Parks standards by 2005.”

The Open Space Element was formally initiated pursuant to a Council motion adopted on May 21, 2001 (CF 96-1358) and is currently undergoing revisions by the Department of City Planning. However, until approval of the Open Space Element, the City Department of

390 City of Los Angeles Public Recreation Plan, a portion of the Public Facilities and Services Element of the City of Los Angeles General Plan. Approved October 10, 1980.
Recreation and Parks is operating under the guidance of the Public Recreation Plan, a portion of the Public Facilities and Services Element of the 1980 City of Los Angeles General Plan. The standards of the Public Recreation Plan are described below.

The Los Angeles Citywide General Plan Framework Final EIR identifies the City’s standard long-range (minimum) ratios for parks to population. According to Section 2.14, Recreation and Open Space, of the Framework Final EIR, the City’s standard minimum ratio of parks to population is two acres per 1,000 residents for neighborhood parks and two acres per 1,000 residents for community parks, and four acres per 1,000 residents of combined neighborhood and community parks. However, as discussed below, the City’s Public Recreation Plan notes that these long-range standards may not be reached during the life of the plan and, therefore, includes more attainable short-term and intermediate-range standards of one acre per 1,000 residents for neighborhood and community parks, or two acres per 1,000 residents of neighborhood and community parks combined.

(c) Sherman Oaks – Studio City – Toluca Lake – Cahuenga Pass Community Plan

As mentioned above, most of the Project Site is currently located in an unincorporated area that is not reflected in the Community Plan’s land use policies. However, a small part of the incorporated portion of the Project Site is located within the Community Plan area. The following is a brief summary of the goals and objectives of the Community Plan with regard to parks and recreation facilities.

The Community Plan identifies issues and opportunities related to recreation, parks, and open space. Issues identified include the accelerated addition, expansion and/or improvement of needed local parks throughout the community, where feasible, and the continued development of equestrian, hiking, and bicycle paths. Opportunities for recreation, park, and open space are recognized through the following Community Plan goals: Goal 1, which seeks to establish adequate recreation and park facilities to meet the needs of the residents in the plan area; and Goal 21, which seeks to achieve a community with sufficient open space in balance with development to serve the recreational, environmental, and health needs of the community and to protect environmental and aesthetic resources. The Community Plan’s parks, recreation, and open space objectives supporting these goals are Objective 1, to conserve, maintain, and better utilize existing recreation and park facilities which promote the recreational experience; and Objective 2,
to preserve existing open space resources and where possible develop new open space. The Project’s consistency with policies that would implement the parks, recreation, and open space goals and objectives of the Community Plan are described in greater detail in Section IV.A.1, Land Use Plans, of this Draft EIR.

The Community Plan also outlines several policies to ensure the goals and objectives of the Community Plan are achieved, including Policy 4-1.1, which aims to preserve existing recreational facilities and park space; and Policy 4-1.2, which aims to increase accessibility to the Los Angeles River Flood Control Channel. To accomplish this latter policy, the Community Plan identifies certain properties as key sites for providing access to the river for recreational purposes, and a design objective that properties adjacent to the river develop an integrated design element to promote the use of the river as a recreational asset.

(d) **Public Recreation Plan**

The Public Recreation 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, including community buildings, gymnasiums, swimming pools, and tennis courts. To a large extent, the Public Recreation Plan focuses on facility planning in residential areas, as these areas generate the greatest demand 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.

Based on the standard park characteristics identified in the Public Recreation Plan, park facilities are discussed in terms of local parks and regional facilities. Local parks include both neighborhood and community recreational parks and open space. A neighborhood recreation site is intended to serve its immediate neighborhood. Although the desirable size for a neighborhood park is considered to be five (5) to ten (10) acres, within the City of Los Angeles, they are usually one (1) to five (5) acres in size. A community recreation site is designed to serve residents of all ages in several surrounding neighborhoods. The desirable size for a community recreation site is considered to be 15 to 20 acres.

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392 City of Los Angeles, Public Recreation Plan, a portion of the Public Facilities and Services Element of the Los Angeles General Plan. Approved October 9, 1980.
The Public Recreation Plan also states that the location and allocation of acreage for neighborhood and community parks and recreational facilities should be determined on the basis of the service radius within residential areas throughout the City. The service radius for a neighborhood park should be approximately 0.5 mile, while an approximate 2-mile radius is acceptable for a community facility. The desired long-range (minimum) standard for local parks is based on two (2) acres per 1,000 persons for neighborhood parks and two (2) acres per 1,000 persons for community parks or four (4) acres per 1,000 persons of combined neighborhood and community parks. However, the Public Recreation Plan also notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short- and intermediate-range standards of one (1) acre per 1,000 persons for neighborhood parks and one (1) acre per 1,000 persons for community parks, or two (2) acres per 1,000 people of combined neighborhood and community parks. Finally, the Public Recreation Plan establishes that no park or recreational facility should be diminished in size or removed from any service radius unless the required acreage is replaced elsewhere within that same service radius, or unless the need is diminished due to population and/or land use changes.

(e) Los Angeles River Revitalization Master Plan (City)

In 2007, the City Council adopted the Los Angeles River Revitalization Master Plan as a vision document constituting the framework within which all future river-related development within the City of Los Angeles will be implemented. The goals set forth in this plan include the following: revitalizing the Los Angeles River Flood Control Channel; enhancing its identity and restoring the functional qualities of the river ecosystem; greening of neighborhoods to be accomplished by creating a continuous river greenway with connections to adjoining neighborhoods via safe public access, with the objective to improve the quality of life; and, water quality through environmentally-sensitive urban design. The Los Angeles River Revitalization Master Plan establishes the goal of creating a continuous 32-mile-long river greenway along the Los Angeles River Flood Control Channel that would provide a dedicated bicycle path on the south and west side of the river and a multi-use trail on the north and east sides of the Los Angeles River Flood Control Channel. These alignments were selected to take advantage of the relatively gradual natural gradient along the Los Angeles River Flood Control Channel as a means of providing a leisurely travel route that is accessible to a wide range of users. The guidelines under the goal to create a continuous river greenway require all circulation and spaces to be Americans with Disabilities Act-compliant regarding maximum grades and surfacing
The Project Site is located in the Los Angeles River Flood Control Channel Reach 4: Tujunga Wash to Barham Boulevard.

The Los Angeles River Revitalization Master Plan provides the overall vision for revitalization of the Los Angeles River, focusing on the qualities of the river itself and its relationship to surrounding communities. The proposed River Improvement Overlay District would implement the Los Angeles River Revitalization Master Plan, establishing guidelines for both private property and public rights-of-way. The proposed River Improvement Overlay District will enable the City to better coordinate land use development along the 32-mile corridor of the Los Angeles River that flows within the City’s boundaries. The River Improvement Overlay District is a proposed special use district that, pursuant to ordinance, would require new projects to achieve points in three design categories: Watershed, Urban Design, and Mobility. The proposed River Improvement District also provides guidelines for new “complete” streets and includes a mobility strategy to ensure that the needs of pedestrians, bicyclists, transit riders, and vehicle drivers are considered when major projects or street improvements are undertaken. The Los Angeles River Revitalization Master Plan identifies opportunities for Los Angeles River Flood Control Channel expansion along Forest Lawn Drive and at Weddington Park (North) and Weddington Park (South), to the east and west of the proposed Project Site, respectively. The Project’s consistency with policies that would implement the Los Angeles River Revitalization Master Plan is described in Section IV.A.1, Land Use Plans, of this Draft EIR.

(f) Los Angeles Municipal Code - Quimby Fees

As authorized under the Quimby Act, the City of Los Angeles has established a local ordinance, Los Angeles Municipal Code Section 17.12 (Park and Recreation Site Acquisition and Development Provisions), which requires land dedication or payment of fees for park or recreational purposes for projects involving residential subdivisions. Los Angeles Municipal Code Section 17.12 provides standards for land acreage requirements by project density and identifies fees per unit by zoning designation. Pursuant to Los Angeles Municipal Code Section 17.12.B, the percentage of gross subdivision area required to be dedicated for park and recreation purposes ranges from 0.9 percent (for subdivisions with a net density of one dwelling unit per acre) to 32.0 percent (for subdivisions with a net density of 100 dwelling units per acre or more). As the City of Los Angeles provides less than three acres of parkland per 1,000 residents, the maximum

exaction per the Quimby Act shall not exceed a maximum of three (3) acres of park area per 1,000 Project residents. Quimby fees are used to acquire necessary land and/or develop new neighborhood and community parks or recreation facilities, which would reasonably serve each residential project. The current Quimby fee is in effect from March 1, 2008 until February 28, 2009. In subdivisions containing more than 50 dwelling units, the City allows developers to dedicate parkland in lieu of paying fees. Additionally, Los Angeles Municipal Code Section 17.12 permits a subdivision to credit the monetary value of parkland improvements and private recreation facilities against a project’s land dedication requirement and/or the payment of in-lieu fees.

Similarly, Los Angeles Municipal Code Section 12.33 requires the dedication of land or payment of fees for park and recreational facilities in connection with a zone change for a multiple residential use in any multiple residential or commercial zone, pursuant to the provisions of Section 17.12 as discussed above.

(g) Dwelling Unit Construction Tax

Pursuant to Los Angeles Municipal Code Section 21.10.3(a)(1) (Dwelling Unit Construction Tax), the City imposes a tax of $200 per dwelling unit on all construction of new dwelling units and modification of existing dwelling units to be paid to the Department of Building and Safety. These taxes are placed into a “Park and Recreational Sites and Facilities Fund” to be used exclusively for the acquisition and development of park and recreational sites. If a developer has already paid Quimby fees, as described under Section 17.12, or has dedicated in lieu parkland or recreational facilities, the dwelling unit tax required may be reduced accordingly.

(h) City of Los Angeles Code-Required Open Space

Los Angeles Municipal Code Section 12.21.G (City Ordinance 171,753) provides minimum standards for the amount of “open space” that residential development projects are required to provide on-site. Open space includes both common and private greenspace and recreational amenities that meet specific standards. However, it should be noted that not all areas designated as open space in the Los Angeles Municipal Code would be classified as park or recreational facilities under the City’s Quimby and Dwelling Unit Construction Tax programs (discussed above), under the General Plan Framework Element, or by the Department of Recreation and Parks.

394 City of Los Angeles, Department of City Planning, Division of Land, Memorandum, Annual Adjustment of “Quimby” Fees – Revision, April 28, 2008.
Pursuant to Los Angeles Municipal Code Section 12.21.G, new construction in the City of six or more dwelling units on a lot is required to provide at a minimum 100 square feet of usable open space for each dwelling unit having less than three habitable rooms; 125 square feet for each dwelling unit having three habitable rooms; and 175 square feet for each dwelling unit having more than three habitable rooms. Usable open space may consist of private and/or common area open space; however, common open space areas must be a minimum of 400 square feet and must constitute at least 50 percent of the total open space provided. Open space does not generally include parking areas, driveways, or required front and side yards. A minimum of 25 percent of the common open space area must be planted with ground cover, shrubs or trees and at least one 24-inch box tree is required for every four dwelling units.

(3) County of Los Angeles

(a) County of Los Angeles General Plan – Conservation and Open Space Element

The Conservation and Open Space Element of the County of Los Angeles General Plan (last amended December 1986) sets policy direction for the open-space related resources in the County. These resources include land and water areas devoted to recreation, scenic beauty, conservation and the use of natural resources. To protect areas of notable natural resources, this Element recommends the retention of areas in non-urban or open space use. Special emphasis is on the retention of hillside areas and areas of important biotic resources that are designated as Significant Ecological Areas.

The County’s Conservation and Open Space Element also outlines specific goals to improve opportunities for a variety of outdoor recreational experiences through several policies. These policies include Policy 6, which encourages the maintenance of landscaped areas and pollution tolerant plants in urban areas, integrating landscaping and open space into housing, commercial, and industrial developments, especially in urban areas, and using drought-resistant vegetation; Policy 30, which seeks to provide low-intensity outdoor recreation in areas of scenic and ecological value compatible with the protection with these natural resources; Policy 32, which encourages improved public transportation to recreational sites; and Policy 33, which aims to develop a system of bikeways, scenic highways, and riding and hiking trails; linking recreational facilities where possible.

The County is currently in the process of updating its General Plan, including, but not limited to the Conservation and Open Space Element. The current draft of the updated Element encourages a more concentrated urban pattern by directing growth to environmentally suitable areas. The Open Space Policy Map designates and categorizes all open space uses within the unincorporated Los Angeles County area. Technical
changes to the Conservation and Open Space Elements that are pending under the County’s General Plan update are as follows: (1) revisions to reflect regulatory changes to the National Pollutant Discharge and Elimination System permit process, water supply planning, water quality issues, and recent species listing at both the State and federal levels; (2) revision to the Open Space Policy Map to reflect new acquisitions; (3) incorporation of relevant objectives of the current Scenic Highway Element; and (4) repeal of the Regional Recreational Areas Plan component and adoption of this plan as a separate document.

(b) Los Angeles River Master Plan (County)

The northern edge of the Project Site adjoins the Los Angeles River Flood Control Channel, which is subject to the land use goals and regulations of the County’s Los Angeles River Master Plan. The Los Angeles River Master Plan, completed by the County of Los Angeles Department of Public Works in 1996, recognizes the Los Angeles River as a body of resources of regional importance that must be protected and enhanced. Since the adoption of the Los Angeles River Master Plan in 1996, the subsequent Sign Guidelines and the Landscaping Guidelines and Plant Palettes amendments to the Los Angeles River Master Plan were approved by the County Board of Supervisors in March 2004. The Los Angeles River Master Plan and the companion Corridor Highlights document were reissued by the County in April 2005. The intent of the Los Angeles River Master Plan is to identify ways to revitalize the publicly-owned rights of way along the Los Angeles River Flood Control Channel. The goals of the Los Angeles River Master Plan are to ensure flood control and public safety; to improve the appearance of the river, to promote the river as an economic asset; to preserve, enhance and restore environmental resources in and along the river; and to ensure safe access to and compatibility between the river and other activity centers. The Los Angeles River Master Plan presents a regional context and recommendations with regard to aesthetics, environmental quality, flood management and water conservation, jurisdiction and public involvement, and recreation. Recreation goals are to provide a network of continuous multi-use trails, to ensure access and compatibility between the river and other activity centers, to provide for a variety of active and passive recreation opportunities, to ensure public safety and security along the river, and to expand open space. The Implementation Chapter of the Los Angeles River Master Plan discusses ways that cities and local agencies can support the River Master Plan through local planning documents. The Project Site is located in Reaches 4 and 5 of the Los Angeles River Master Plan. The Los Angeles River Master Plan calls for a trail/bicycle path, aesthetic improvements, and tree plantings along both sides of the Los
Angeles River Flood Control Channel; trail access adjacent to the west side of Lankershim Boulevard; and a pedestrian/bicycle path connection to Universal CityWalk.  

Recommendations for the Los Angeles River Flood Control Channel include the assurance that new development adjacent to the river would be compatible with, and complementary to, the river. Although identified in the County’s Los Angeles River Master Plan, implementation of proposed improvements located within the City boundaries would be administered by the City. The Los Angeles Department of Transportation, with the support of the Department of Public Works Bureaus of Engineering, Street Lighting, and Street Services, develops, seeks funding for, and engineers bikeways located within the City boundaries. In particular, the Department of Transportation’s Bikeway Engineering Group is responsible for the design and oversight of new bike path and bike lane projects throughout the City of Los Angeles. Of the 32 miles within the City’s Los Angeles River Revitalization Master Plan’s study area, presently 4.86 miles of bikeway have been completed. The Los Angeles Department of Transportation has been designing and constructing two mile segments of the bike path as funding is available. The Project’s consistency with policies that would implement the Los Angeles River Master Plan is described in Section IV.A.1, Land Use Plans, of this Draft EIR.

(c) Los Angeles County Code

As authorized under the Quimby Act, Title 21 (Subdivisions) of the Los Angeles County Code outlines the obligation of subdividers of residential subdivisions to provide local park space, either through the means of direct provision of parkland as part of a residential development, or through the payment of fees associated with the development to provide for local park services. Local park services are defined by the Los Angeles County Code as publicly or privately owned playgrounds, riding and hiking trails, tennis, basketball (or other similar game-court areas), putting greens, athletic fields, picnic areas, and other types of natural or scenic areas. Los Angeles County Code Section 21.24.340 requires the subdivider of a residential subdivision to provide local park space to serve the subdivision, pay a fee in lieu of such park land in accordance with the provisions of Section 21.24.340, provide local park space containing less than the required obligation but developed with amenities equal in value to the park fee, or do a combination of both in accordance with the requirements set forth by the Los Angeles County Code. Section 21.24.340 also establishes the formula for determining the extent of the local park

395 County of Los Angeles Department of Public Works, Los Angeles River Master Plan, Reach 5: San Fernando Valley, 1996, page 262.
space obligation, based on the park planning area in which the subdivision is located and the type of residential subdivision to be constructed. Los Angeles County Code Section 21.24.350 (Residential Subdivisions – Provision or local park sites) requires a residential subdivision of more than 50 lots to provide park space as determined by the advisory agency. If such park space is less than the total park obligation required, then the subdivider of a residential development shall pay park fees in accordance with Los Angeles County Code Section 21.28.140, provide amenities to the park space equal in value to the park fees, or do a combination of both. Los Angeles County Code Section 21.28.140 outlines the computation and use of in lieu fees for portions of a residential subdivision’s local park space obligation that is not satisfied, based on the local park planning area.

The County portion of the Project Site is located in Park Planning Area #38 – Universal City, which is a satellite of the main portion of Park Planning Area #38 – La Crescenta-Montrose. New residential development occurring within Park Planning Area #38 shall implement park improvements consistent with provisions of Los Angeles County Code Section 21.24.340 as described above.

As mentioned above, if the park requirements established in Los Angeles County Code Section 21.24.340 would not be met by a residential project, then the developer must pay park fees in accordance with Los Angeles County Code Section 21.28.140, provide amenities to the park space equal in value to the park fees, or do a combination of both. Under Los Angeles County Code Section 21.28.140, if all or any portion of the local park space obligation for a residential subdivision is not satisfied by the provision of local park space designated by the advisory agency pursuant to Section 21.24.340, the following park fees shall be paid as a condition precedent to final approval of the subdivision: a base fee equal to the local park space obligation derived from the equation set forth in Los Angeles County Code Section 21.24.340, less the amount of park space, if any, provided by the residential subdivider pursuant to Los Angeles County Code Section 21.24.340, times the representative land value for the appropriate park planning area. The County has determined that effective July 1, 2008, the approximate land value in Park Planning Area #38 is $385,621 per acre.396

Los Angeles County Code Section 22.08.080 H defines a Hillside Management Area as an area having a natural slope of 25 percent or more. The Project Site contains slopes that have a natural grade of 25 percent or more. Open space requirements for residential developments within a Hillside Management Area are regulated under Los Angeles County

396 Los Angeles County Code, Section 21.28.140.
Code Section 22.56.215, which states that open space shall comprise not less than 25 percent of the net area of a residential development in an urban Hillside Management Area. Subject to the approval of the hearing officer, such open space may include one or more of the following: (i) undisturbed natural areas; (ii) open space for passive recreation; (iii) private yards, provided that certain construction rights are dedicated; (iv) parks and open recreational areas; (v) riding, hiking and bicycle trails, (vi) landscaped areas adjacent to streets and highways; (vii) greenbelts; (viii) areas graded for rounding of slopes to contour appearance; and (ix) such other areas as the hearing officer deems appropriate.

b. Standards and Goals

(1) City of Los Angeles

Per the Public Recreation Plan, the City of Los Angeles Department of Recreation and Parks (City) overall standard ratio of combined neighborhood and community parks to population is four (4) acres per 1,000 people. As noted above, the service radius for a neighborhood park should be approximately 0.5 mile, while an approximate two (2)-mile radius is acceptable for a community facility. The desired long-range (minimum) standard for local parks, as set forth in the Public Recreation Plan, is based on two (2) acres per 1,000 persons for neighborhood parks and two (2) acres per 1,000 persons for community parks or four (4) acres per 1,000 persons of combined neighborhood and community parks.

The standard minimum ratio of parks to population as set forth in the Los Angeles Citywide Framework Final EIR are the same as those set forth in the Public Recreation Plan, except that General Plan Framework identifies a minimum standard of one acre per 1,000 residents for community parks. However, the Public Recreation Plan and the General Plan Framework Element Final EIR also note that these long-range standards may not be reached during the life of the plan. In recognition of this circumstance, the Public Recreation Plan includes more attainable short- and intermediate-range standards of one (1) acre per 1,000 persons for neighborhood parks and one (1) acre per 1,000 persons for community parks, or two (2) acres per 1,000 persons of combined neighborhood and community parks.

397 City of Los Angeles, Public Recreation Plan, a portion of the Public Facilities and Services Element of the Los Angeles General Plan. Approved October 9, 1980.
(2) County of Los Angeles

The County of Los Angeles Department of Parks and Recreation (County) currently maintains a standard ratio of four (4) acres per 1,000 people for local parkland and six (6) acres per 1,000 people for regional parkland.398

c. Existing Park and Recreation Facilities

Park and recreational facilities surrounding the Project Site are operated by the City and County. The following discussion provides an overview of existing conditions for park and recreation facilities operated and maintained by the above-mentioned agencies within a two (2)-mile radius of the Project Site. A two-mile radius is used as it is anticipated that those who would use the facility would reside within that distance. This is consistent with the guidance set forth in the City of Los Angeles CEQA Thresholds Guide.

(1) City of Los Angeles

Parks and recreational facilities operated within the City of Los Angeles are administered by the City’s Department of Recreation and Parks and are divided into four (4) organizational regions: (1) Metropolitan Region, which incorporates central and east Los Angeles; (2) Pacific Region, which includes west and south Los Angeles; (3) Griffith Region, which incorporates all facilities in Griffith Park; and the (4) Valley Region, which incorporates all facilities within the portion of the San Fernando Valley located within the City of Los Angeles. The Project Site is and/or would be located in the Valley Region. The Department of Recreation and Parks maintains over 15,710 acres of parkland, comprised of 390 neighborhood and regional parks and 176 recreation centers, as well as 13 golf courses, 287 tennis courts, 9 dog parks, 59 swimming pools, 7 skate parks, 7 museums, 24 child care facilities, 30 senior centers, 2 beaches, and an urban forest of one million trees.399

The Project Site is located in the Valley Region; however, the City uses the Community Plan area as the statistical geographic area to evaluate the park needs of area residents. However, as the City generally considers a parks service radius to be two miles, park facilities within two (2) miles of the Project Site have been identified for evaluation.

398 Public Service Response Letter from Bryan Moscardini, Development Facility Planner I, County of Los Angeles Department of Parks and Recreation, April 16, 2006.

purposes. The City has identified 11 park and recreational facilities, totaling 4,630.92 acres, located within a two-mile radius of the Project Site.\footnote{Public Service Response Letter from Michael A. Shull, Superintendent, City of Los Angeles Department of Recreation and Parks, June 8, 2007.} These park and recreational facilities are listed in Table 151 on page 1785 and shown on Figure 210 on page 1786, and include two (2) neighborhood parks, seven (7) community parks, and two (2) regional parks. The City has indicated that the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan area is a high density area that is below the standards for neighborhood and community park acreage; and that the facilities in the Community Plan area with active recreational features are heavily used.\footnote{Ibid.} The Community Plan area currently provides only 1.21 acres of neighborhood and community park acreage per 1,000 persons.\footnote{Ibid.} This results in a deficiency of 2.79 acres of neighborhood and community parks per 1,000 persons to meet the long-term standards established in the Public Recreation Plan. The City currently has no plans to develop new or to expand existing park facilities within two (2) miles of the Project Site.

\textbf{(2) County of Los Angeles}

Parks and recreational facilities operated within the County of Los Angeles are administered by the County of Los Angeles Department of Parks and Recreation and are divided into five (5) Supervisorial Districts. The Project Site is located in the Third Supervisorial District. The County of Los Angeles Department of Parks and Recreation currently maintains 65,528 acres of parkland, comprised of 67 Local Parks, 17 Community Regional Parks, 10 Regional Parks, 14 Lakes and Lagoons, 19 Golf Courses, 4 Arboretum and Botanic Gardens, 9 Wildlife and Wildflower Sanctuaries, 6 Natural Areas, 158 Playgrounds, 132 tennis courts, 144 ball fields, 49 basketball courts, 31 swimming pools, 12 fishing lakes, and 52 Riding and Hiking Trails covering 344 miles.\footnote{County of Los Angeles Department of Parks and Recreation, Annual Report, 2005–2006. Available at: http://www.lacountyparks.org/Parkinfo.asp?URL=aboutthedeptartment.asp&Title=About%20the%20Department, accessed May 13, 2008.}

The Project Site is located in Park Planning Area #38 – Universal City, which is a satellite of Park Planning Area #38 – La Crescenta-Montrose. The County offers two (2) recreational facilities, totaling 104.22 acres, within a two (2)-mile radius of the Project Site. These facilities are shown on Figure 210 on page 1786 and listed in Table 152 on page 1787. Both of these facilities are performing arts centers and include the John Anson Ford
### Table 151
City of Los Angeles Recreational Facilities Within a 2-Mile Radius of the Project Site

<table>
<thead>
<tr>
<th>Map Number</th>
<th>Facility</th>
<th>Acres</th>
<th>Park Classification</th>
<th>Features</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Campo de Cahuenga</td>
<td>0.80a</td>
<td>Special Facility</td>
<td>Museum and community room (capacity 20 persons).</td>
</tr>
<tr>
<td>2</td>
<td>El Paso de Cahuenga Park</td>
<td>1.29</td>
<td>Neighborhood</td>
<td>Picnic tables.</td>
</tr>
<tr>
<td>3</td>
<td>Griffith Park</td>
<td>4,217.87</td>
<td>Regional</td>
<td>Urban wilderness areas, the Greek Theater (5,700 seats), picnic area, Autry National Museum, LA Zoo, Griffith Observatory, 4 Municipal Golf Courses, swimming pools, camping, hiking, horseback riding, children’s recreation areas.</td>
</tr>
<tr>
<td>4</td>
<td>Laurel Canyon Park</td>
<td>20.00</td>
<td>Community</td>
<td>An off-leash dog park.</td>
</tr>
<tr>
<td>5</td>
<td>North Hollywood Recreation Center</td>
<td>49.28</td>
<td>Community</td>
<td>A 250-person indoor gymnasium (also used as an auditorium), Los Angeles Police Department stop-in center, barbeque pits, outdoor lighted baseball and basketball courts, children’ play area, handball courts, indoor gym, seasonal pool, and outdoor lighted tennis courts. The park also features a 0.9 mile jogging trail, kitchen, splash pad, and a stage. Additional facilities within the park include the North Hollywood Senior Center, the Valley Therapeutic Recreation Center and the Amelia Heart Library. Further, the park features various community sports programs and provides a free summer lunch program.</td>
</tr>
<tr>
<td>6</td>
<td>Weddington Park (North)</td>
<td>11.50</td>
<td>Community</td>
<td>A 250-person indoor gymnasium (also used as an auditorium), indoor lighted basketball courts, children's play area, lighted handball courts, two break rooms, a kitchen, stage, and outdoor volleyball courts. Also features various community sports programs. Additionally this facility provides the following programs: after-school, arts and crafts, L.A Kids, and a free summer lunch program.</td>
</tr>
<tr>
<td>7</td>
<td>Runyon Canyon Park</td>
<td>134.00</td>
<td>Community</td>
<td>Hiking trails and an off-leash dog park.</td>
</tr>
<tr>
<td>8</td>
<td>Weddington Park (South)</td>
<td>13.56</td>
<td>Community</td>
<td>Barbeque pits, outdoor lighted baseball diamond, a jogging path, and a large grass area.</td>
</tr>
<tr>
<td>9</td>
<td>Wattles Garden Park</td>
<td>48.16</td>
<td>Community</td>
<td>An historic mansion and tea house, hiking trails, Japanese garden, community garden, and a stream/brook.</td>
</tr>
<tr>
<td>10</td>
<td>Whitnall Off-Leash Dog Park</td>
<td>10.76</td>
<td>Community</td>
<td>A 3-acre off-leash dog park featuring a 50,000 square foot large-dog area, and a 22,000 square foot small-dog area.</td>
</tr>
<tr>
<td>11</td>
<td>Wilacre Park</td>
<td>120.00</td>
<td>Regional</td>
<td>Part of the Santa Monica Mountains Conservatory, and features an open wild grass area.</td>
</tr>
<tr>
<td>12</td>
<td>Woodbridge Park</td>
<td>4.50</td>
<td>Neighborhood</td>
<td>Children’s play area and picnic tables.</td>
</tr>
</tbody>
</table>

**Total 4,630.92a**

*a The Campo de Cahuenga is not included in the parks acreage total as it is a special facility (i.e., a museum).*

Figure 210
Park Facilities within a 2-Mile Radius of the Project Site

Legend
- City Park
- County Park
- Project Site Boundary

City Facilities
1. Campo de Cahuenga
2. El Paso de Cahuenga Park
3. Griffith Park
4. Laurel Canyon Park
5. North Hollywood Recreation Center
6. Weddington Park (North)
7. Runyon Canyon Park
8. Weddington Park (South)
9. Wattles Garden Park
10. Whitnall Off-Leash Dog Park
11. Wilacre Park
12. Woodbridge Park

County Facilities
13. John Anson Ford Theater
14. Hollywood Bowl

Source: Los Angeles Parks and Recreation, laparks.org, ESRI Streetmap and Matrix Environmental, 2010.
IV.K.4  Public Services – Parks and Recreation

Amphitheatre and the Hollywood Bowl. The County has determined that due to the nature of these facilities, they do not contribute to meeting the County’s need for park and recreational facilities in the Project area. The County operates very few park and recreational facilities in the Third Supervisional District, and states a deficiency in the Third Supervisiorial District of 80 acres of local parkland (4 acres/1,000 residents for 20,067 residents, 0 acres currently provided) and a 29-acre deficiency of regional parkland (6 acres/1,000 residents for 20,067 residents, 85.2 currently provided outside of the 2-mile radius of the Project Site). The County currently has no plans to develop parks or recreational facilities, or expand existing facilities within a two (2)-mile radius of the Project Site, beyond normal refurbishments or repair to existing facilities.

(3) Conditions Within the Proposed Project Site

The proposed Project Site is located in the Valley Region of the City of Los Angeles Department of Recreation and Parks’ jurisdiction and in County of Los Angeles Park Planning Area #38 of the County of Los Angeles Department of Parks and Recreation. No public parkland currently exists on-site. However, Universal Studios Hollywood, located within the Project Site, is one of Southern California’s largest and most notable private recreation facilities.

<table>
<thead>
<tr>
<th>Map Number</th>
<th>Facility</th>
<th>Acres</th>
<th>Features</th>
</tr>
</thead>
<tbody>
<tr>
<td>13</td>
<td>John Anson Ford Amphitheatre</td>
<td>26.83</td>
<td>1 amphitheatre (seats 1,240), 100 picnic tables, 6 restrooms, 2 concession stands, 1 small indoor theater (seats 87), and off-street parking areas (350 spaces).</td>
</tr>
<tr>
<td>14</td>
<td>Hollywood Bowl</td>
<td>77.39</td>
<td>1 amphitheatre (seats 17,363), lighted outdoor stage, 7 dressing rooms, 16 picnic sites, 224 picnic tables, Bowl theater, 10 concession stands, 2 kiosk shops, 2 gift shops, 1 roof top restaurant, 2 warehouses, and parking for 2,700 vehicles.</td>
</tr>
</tbody>
</table>

Total 104.22

Source: Public Service Response Letter from Bryan Moscardini, Departmental Facility Planner I, County of Los Angeles Department of Parks and Recreation, April 16, 2006.
3. Environmental Impacts

a. Methodology

The analysis of parks and recreation impacts is based on the identification of service ratios that compare the amount of public recreation space available to the population that would utilize that space. Such service ratios are identified for the proposed Project and compared against the established City and County standards. The various ratios are compared to draw a conclusion regarding the Project’s potential significance on park and recreation space. In addition, the analysis evaluates the Project in terms of the applicable standards as set forth in the City of Los Angeles Municipal Code and the Los Angeles County Code.

b. Thresholds of Significance

According to the City of Los Angeles CEQA Thresholds Guide (2006, p. K.4-3), a finding of significance involving 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 improvements to recreation and park services (renovation, expansion, or addition) and the project’s proportional contribution to 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).404

Based on these factors, the proposed Project would have a significant impact on parks and recreation, if:

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404 The use of utility easements or transmission line right-of-way (ROW) for park or recreational facilities requires an agreement with the utility.
• The Project would generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and service; 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 area.

c. Project Design Features

Under the proposed Project, approximately 139 acres of the Project Site would be located within the City of Los Angeles, and the remaining approximately 252 acres would be located within the boundaries of the County of Los Angeles. Proposed land uses within the City include all of the residential development (2,937 units), 180,000 square feet of community- and neighborhood-serving commercial uses, as well as 300,000 square feet of studio and studio office uses. Proposed land uses in the County include approximately 1.59 million square feet of net new studio, entertainment, office, and hotel uses. The proposed hotel would total up to 450,000 square feet in size and includes up to 500 hotel guest rooms and related hotel facilities. The analysis of potential Project impacts is based on the maximum amount of development that could potentially occur by the year 2030 under the proposed City and County Specific Plans.

Pursuant to the proposed City Specific Plan, the proposed Project would be required to provide park or recreation space in an amount equal to 200 square feet per dwelling unit within the City Specific Plan area to meet the recreation needs of residents. Required open space areas may be provided in the form of courtyards; plazas; pedestrian paseos; trails; private setbacks; roof terraces; gardens; picnic areas; playgrounds; exercise areas; and sports-related facilities, including but not limited to, tennis courts, swimming pools, and basketball courts; or other similar outdoor gathering places. Examples of facilities that may be developed under the Project are shown on Figure 211 on page 1790. In addition, pocket parks and on-structure plazas, which may include active recreation area amenities, would be located in various locations throughout the Mixed-Use Residential Area. Upon buildout of all proposed residential units (i.e., 2,937 dwelling units), the provision of 200 square feet of park space or recreation facilities per residential dwelling unit would provide approximately 13.5 acres of parks space and recreation facilities within the Mixed-Use Residential Area.

In addition, the Applicant would be responsible for all costs of construction and costs of providing equipment and improvements for the parks and recreation facilities provided in the Mixed-Use Residential Area. The property owners association would be responsible for ownership and maintenance of the on-site parks and recreation facilities.
PARK LANDS / OPEN SPACE

Legend

- Park
- Park - Hiking Trail
- Open Space
- Open Space District Boundary *
- Universal City Specific Plan Area

* Pocket Parks (1) and On-Structure Plazas (2) will occur in multiple locations that will be determined through subsequent design. Locations shown on this diagram are conceptual.

** Nature Park area is also potential location of substation/ utility infrastructure and public service facilities.

+ Areas not identified as part of an Open Space District are part of the Mixed-Use Universal City District.


Figure 211
Conceptual Mixed-Use Residential Area
Park & Open Space Plan
In addition to the required 200 square feet per residential dwelling unit, the proposed Project would also include a Hillside Open Space Area, which would provide approximately 22 acres of open space area at Project buildout based on the Project's Conceptual Parks and Open Space Plan. The Hillside Open Space Area would be landscaped with drought tolerant native and ornamental plants, trees and vegetation. Plantings within the Hillside Open Space Area would follow natural patterns, with the vegetation being more densely planted within the perimeter areas to provide an aesthetically pleasing visual buffer.

The proposed Project would also construct an on-site bicycle network that would serve both recreation and transportation purposes. New on-site bike lanes would be introduced along the future North-South Road, various smaller roadways proposed within the Mixed-Use Residential Area, and the realigned Universal Hollywood Drive passing south of Universal CityWalk. This network would also provide a linkage across the Project Site. The proposed bicycle network would begin at the proposed Trailhead Park, which is located at the northeast corner of the Project Site, and continue to the proposed North-South Road. The bike path would then continue along the proposed North-South Road until connecting with an internal path leading to Universal Hollywood Drive (which would also provide access to Universal CityWalk). The bicycle path would then continue along Universal Hollywood Drive to its intersection with Lankershim Boulevard. The proposed on-site bicycle network is displayed in Figure 212 on page 1792.

d. Project Impacts

(1) Construction Impacts

The Project is anticipated to generate 16,559 construction-related jobs between the start of construction and Project buildout in 2030. The County has indicated that construction of the proposed Project would result in traffic impacts to the County facilities within two (2) miles of the Project Site (i.e., the John Anson Ford Amphitheatre, and the Hollywood Bowl). However, construction would not take place in the vicinity of these facilities, and therefore, Project construction would not impact access to these facilities.

Further, construction of the proposed Project would also not result in access restrictions to City parks and recreation facilities, as the majority of construction would take place on-site and off-site improvements would be limited to those infrastructure improvements (e.g., roadway improvements, etc.) required to serve the proposed Project. Construction of these improvements would be temporary in nature and access to parks and recreation facilities would be maintained at all times, to the extent feasible, through the implementation of construction management plans for those improvements. Therefore, construction of the Project would result in less than significant access restriction impacts to City and County recreational facilities.
LEGEND

Bike Path

Pedestrian Paths
(both sides of North-South Road)

Note:
1. The alignment shown for the bike path is for illustrative purposes only.
Project construction would result in a temporary increase in the number of workers to the Project area, thus, there is the potential for workers to utilize park facilities. Generally, this increase is anticipated to be negligible, as construction workers are highly transient in their work location and would likely utilize park facilities near their place of residence and because lunch break times are typically not long enough (30 to 60 minutes) for employees to take advantage of park facilities services and return to work within the allotted time. However, as Weddington Park (South) is located near the Project Site, there is the potential for construction workers to utilize the park during their lunch break. Although there is a potential for construction workers to utilize the park, any resulting increase in the use of the park would be temporary and would occur during off-peak park usage hours.

No aspect of Project construction would occur within or adjacent to Weddington Park (South) and vehicular access to the park would be maintained at all times. Further, no Project construction would reduce the size of Weddington Park (South) or result in a change of use at the park. Therefore, Project construction would not interfere with existing park usage in a manner that would reduce the ability to access and use Weddington Park (South).

As such, construction-related impacts associated with park facilities would be less than significant with regard to both City and County recreation facilities.

(2) Operational Impacts

(a) City of Los Angeles Facilities

Under the proposed Project, 2,937 residential dwelling units would be constructed in the Mixed-Use Residential Area, which would generate an estimated residential population of 6,450 persons by Project buildout in 2030. Under the proposed Project, this residential population would be located entirely within the jurisdictional boundaries of the City of Los Angeles and would generate additional demand for City parks and recreation facilities. The City has determined that the existing supply of parks and recreational facilities is already inadequate in the Community Plan area and that the Project would have a direct impact on City parks and recreational facilities. In addition, the Hollywood Community Plan Area, located directly to the east and south of the Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan area, has an even more substantial

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For further information regarding the population estimate, refer to Section IV.J, Population, Housing and Employment of this Draft EIR.
The park area-to-person ratio of the Hollywood Community Plan area is currently 0.41 acres of neighborhood and community parks per 1,000 residents, well below all of the standards established in the Public Recreation Plan.\textsuperscript{406}

The proposed Project would introduce new population and demand for City park space within two (2) miles of the Project Site. It would also introduce a system of park and recreational facilities to help meet recreation needs of the increased population of the proposed Project. As discussed above, the proposed Project would, in accordance with Section 5.A of the proposed City Specific Plan, provide park or recreation space in an amount equal to 200 square feet per dwelling unit within the proposed City Specific Plan area to meet the recreation needs of residents. Upon Project buildout, the Project would provide approximately 13.5 acres of park space and recreational facilities throughout the Mixed-Use Residential Area. The location and design of these facilities would be in general accordance with the Project's Conceptual Park and Open Space Plan (please refer to Figure 211 on page 1790).

Although the City has indicated that the Project would have a direct impact on City facilities, Project development in accordance with the provisions of Section 5.A of the proposed City Specific Plan, which would require the provision of 200 square feet of on-site park space or recreational facilities per residential dwelling unit, would help to alleviate the additional demand on City park services generated by the Project's additional residents. Table 153 on page 1795 shows the park service levels and Project impact on park service levels within the Community Plan area, based on the residents added by the proposed Project. Implementing the provisions of Section 5 of the proposed City Specific Plan equates to a park ratio of 2.09 acres per 1,000 Project residents. As such, the Project provides parks at a higher ratio (2.09) than the existing ratio in the Community Plan area (1.21), and as such, the overall ratio in the Community Plan area would be improved with the development of the proposed Project. As shown, at final buildout, the proposed Project would increase the park ratio in the Community Plan area to 1.28 acres per 1,000 residents, a 5.8 percent increase over existing conditions. While the proposed Project would not meet the long-range goal of four (4) acres of community and neighborhood park per 1,000 residents, the Project would meet the Public Recreation Plan's short- and intermediate-range goal of two (2) acres of community and neighborhood parks.

\textsuperscript{406} The City portions of the Project Site are located entirely within the Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan area and information regarding the Hollywood Community Plan area has been included for informational purposes only.
As the Project’s park space and recreational facilities would be developed in general accordance with the Project’s Conceptual Parks and Open Space Plan, these facilities would meet the Public Recreation Plan’s definition of recreational sites. While Section 5.C of the proposed City Specific Plan includes park space and recreation facilities that are not included in the Public Recreation Plan’s definition of recreational sites (e.g., roof terraces, courtyards, pedestrian paseos), such facilities would meet the intent of the Public

<table>
<thead>
<tr>
<th>Area</th>
<th>Population</th>
<th>Park Acreage</th>
<th>Ratio (acres/1,000 Population)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sherman Oaks – Studio City – Toluca Lake – Cahuenga Pass Community Plan</td>
<td>78,978a</td>
<td>95.6b</td>
<td>1.21c</td>
</tr>
<tr>
<td>Hollywood Community Plan Area</td>
<td>224,405d</td>
<td>92.0b</td>
<td>0.41c</td>
</tr>
<tr>
<td>Los Angeles City</td>
<td></td>
<td>3,740</td>
<td>0.98c</td>
</tr>
<tr>
<td>County of Los Angeles Third Supervisional District</td>
<td>20,067f</td>
<td>85.2f</td>
<td>4.25g</td>
</tr>
<tr>
<td>Proposed Project</td>
<td>6,450</td>
<td>13.5h</td>
<td>2.09</td>
</tr>
</tbody>
</table>

### Project Impact on Service Levels in Community Plan Area (Active Recreation)

<table>
<thead>
<tr>
<th>Community Plan Area</th>
<th>Population</th>
<th>Park Acreage</th>
<th>Ratio (acres/1,000 Population)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing</td>
<td>78,978</td>
<td>95.6</td>
<td>1.21</td>
</tr>
<tr>
<td>Proposed Project</td>
<td>6,450</td>
<td>13.5h</td>
<td>2.09</td>
</tr>
<tr>
<td>Existing with Proposed Project</td>
<td>85,428</td>
<td>109.1</td>
<td>1.28</td>
</tr>
</tbody>
</table>

Source: Matrix Environmental, 2010.
Recreation Plan in that they would serve the recreational needs of the population and reduce impacts to existing parks and recreational facilities. Thus, all of the Project’s park space and recreational facilities would meet the intent of the City’s Public Recreation Plan.

Pursuant to Section 5.E of the proposed City Specific Plan, implementation of the Project’s park space and recreation facilities in accordance with Section 5 of the proposed City Specific Plan would satisfy the requirements of Los Angeles Municipal Code Sections 12.21.G, 12.33, 17.12, and 17.58. All four of these sections establish parks and open space standards for residential developments. However, of these four sections, only Sections 17.12, 17.58, and 12.21.G establish standards for the dedication of park and recreation space by residential development, whereas Section 12.33 establishes an administrative process in which a project that rezones multi residential or commercial lands to a multi residential land use must comply with the dedication requirements of Section 17.12. Los Angeles Municipal Code Section 17.58 requires developments of four or fewer dwellings to dedicate land, pay a fee in-lieu, or some combination of the two in order to provide park space and recreation facilities in accordance with the provision of Los Angeles Municipal Code Section 17.12. As Los Angeles Municipal Code Section 17.58 extends the provisions of Los Angeles Municipal Code Section 17.12 to small residential developments, the analysis of the Project’s consistency with Los Angeles Municipal Code Section 17.12, as provided below, also applies to Los Angeles Municipal Code Sections 17.58 and 12.33.

Los Angeles Municipal Code Section 12.21.G.2 sets forth requirements for the provision of usable open space and requires at a minimum, 100 square feet of usable open space for each dwelling unit having less than three habitable rooms; 125 square feet for each dwelling unit having three habitable rooms; and 175 square feet of private open space per dwelling unit for each dwelling unit having more than three habitable rooms. The requirements of Section 12.21.G are not independent of the requirements of Section 17.12, and as such, providing recreational amenities pursuant to Section 12.21.G may be credited against the requirements for parks and recreation space required by Sections 17.12 and 17.58. Thus, as the proposed Project would provide 200 square feet of park space or recreation area in accordance with Section 5.A of the proposed City Specific Plan, the Project would be consistent with Los Angeles Municipal Code Section 12.21.G. Therefore, the balance of the analysis of Los Angeles Municipal Code parks and recreation provisions focuses on Project consistency with Los Angeles Municipal Code Section 17.12.

Los Angeles Municipal Code Section 17.12, which implements the State’s Quimby Act, requires lands to be dedicated for parks and recreation areas, or requires the payment of fees in lieu thereof when residential subdivisions are proposed, as is the case with the proposed Project. Section 17.12 utilizes a project’s residential net density to determine the amount of park space or recreation facilities that needs to be provided. As the Project
would result in a residential net density of approximately 28 dwelling units per acre. Section 17.12.B requires that 12.2 percent of the gross subdivision area be dedicated for park and recreation purposes. As such, the proposed Project would be required to dedicate 15.5 acres of land for park and recreation purposes. When divided among the Project’s proposed 2,937 residential units, this equates to a requirement of 231 (230.59) square feet per residential unit. As such, the Project’s provision of 200 square feet of park space or recreation facilities per residential dwelling unit would be less than required under Los Angeles Municipal Code Section 17.12.

However, the park space and recreational facilities provided by the Project would be fully improved in general accordance with the conceptual Parks and Open Space Plan as opposed to just the dedication of unimproved open space as required under Los Angeles Municipal Code Section 17.12. Also of importance are the provisions of Los Angeles Municipal Code Section 17.12.F, which establish the conditions under which recreational areas and facilities implemented by a project can be credited against the project’s requirement to dedicate unimproved land. Specifically, Los Angeles Municipal Code Section 17.12.F permits the credit of improved private parks and recreation facilities against a project’s land dedication requirement, or the payment of in-lieu fees, provided that:

1. The private ownership and maintenance of the facilities shall be adequately provided for by written agreements;

2. The use of the private facilities is restricted for park and recreational purposes by recorded covenants which run with the land in favor of the future owners of property within the tract and which cannot be defeated or eliminated without the consent of the City Council;

3. The proposed private facilities are reasonably adaptable for use for park and recreational purposes, taking into consideration such factors as size, shape, topography, geology, access and location of the private open space land; and

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407 The Project proposes 2,937 dwelling units on a net land area of 103.7 acres, resulting in a net density of 28.32 dwelling units per acre of developable land. In accordance with Los Angeles Municipal Code Section 17.12.B, projects with this density are required to dedicate 12.2 percent of the gross subdivision area to park and recreation purposes.

408 The proposed Project would result in a net density of approximately 28 dwelling units per acre on 127.44 gross acres of land. At a City-required dedication rate of 12.2 percent, this equates to a dedication of 15.547 acres (677,257 square feet) (15.5 acres) for park and recreation purposes.
(4) The facilities are in substantial accordance with the Public Recreation Plan portion of the Service Systems Element of the General Plan.

The first two conditions would be implemented by the Applicant following Project approval, whereas the third and fourth requirements would be met by providing fully improved park space and recreation facilities in general accordance with the Project’s Conceptual Parks and Open Space Plan. Therefore, the park space and recreational facility improvements that would be implemented by the Applicant would satisfy the provisions of Los Angeles Municipal Code Section 17.12.F, and thus, would be eligible as credits against the Project’s land dedication requirements pursuant to Los Angeles Municipal Code Section 17.12.B. The value of these improvements plus the park and recreation space provided would exceed the Project’s land dedication requirements. Therefore, implementation of the proposed City Specific Plan requirements would ensure that the Project would provide more park space and recreational facilities than is required under Los Angeles Municipal Code Sections 12.21.G, 12.33, 17.12, and 17.58. As such, a less than significant impact would occur with implementation of the proposed City Specific Plan’s park space and recreational facility requirements.

It is anticipated that the majority of park usage would be by individuals who permanently reside at the Project Site and the non-residential uses added to the Project Site would result in negligible, if any, increased demand at City recreation facilities. If impacts to these facilities occur, increased usage would principally occur by employees seeking to eat their lunch off-site at local parks located in proximity to the Project Site, principally Weddington Park (South), which is located west of Lankershim Boulevard and that Project employee use of nearby parks would principally occur during non-peak periods (i.e., weekdays during the mid-day time period). It is not anticipated that Project Site employees would use local parks for purposes related to their employment at the Project Site. Although the potential for Project employee use of off-site parks is possible, actual use of such facilities would be inhibited by the amount of time it would take for on-site employees to access off-site local parks in light of the amount of time a typical employee has available for lunch. Therefore, while some employee usage is anticipated to occur, impacts, if any, would be less than significant.

It should be noted that the City has indicated that the employees and patrons of the additional proposed studio, office, theme park, Universal CityWalk, and hotel uses may use nearby recreation and park facilities, but has also indicated that the City Department of Recreation and Parks has not developed standards to determine to what extent this use
would occur and acknowledged that the City is not authorized to collect Quimby fees or any other park impact fees for commercial developments of this type.\textsuperscript{409} Thus, the City has encouraged the developers of the proposed Project to link with nearby recreation and park facilities to develop mutually beneficial partnerships, programs, and improvements.

Therefore, with the implementation of the proposed City Specific Plan provisions, which would require the Applicant or its successor to construct parks and recreation improvements, impacts to City parks and recreation facilities would be reduced to a less than significant level.

\textit{(b) County of Los Angeles Facilities}

Although the County has indicated that the existing park and recreation facilities are not adequate to serve the La Crescenta-Montrose / Universal City Park Planning Area, it is anticipated that the increase in park usage from the Project would be from the Project’s residents. Under the proposed Project, no residential units would be constructed in the County. The County facilities within two (2) miles of the Project Site are performing arts centers used for special events and the next nearest County facilities that support regular recreation activities are located approximately eight (8) miles from the Project Site. Because of the relatively large distance to the next nearest County facilities that support regular recreational facilities, the County indicated that it is unlikely that the additional residents resulting from the Project would utilize County facilities. As the County facilities in the Project area would not experience an increase in demand, impacts to County recreational facilities would be less than significant. Additionally, the County has acknowledged that since all residential development would occur within the City of Los Angeles under the proposed Project, there would be no Quimby fees required pursuant to the provisions of the Los Angeles County Code.

The Project would result in approximately 5,193 new jobs by Project build out in 2030, potentially resulting in additional demand by on-site employees for parks and recreational facilities operated by the County of Los Angeles, although this increase is unlikely since there are no County facilities within two (2) miles of the Project Site that support regular recreational programming. Employees seeking to eat their lunch off-site at local parks located in proximity to the Project Site would likely utilize Weddington Park (South), which is located west of Lankershim Boulevard and is a City facility. County

\textsuperscript{409} Public Service Response Letter from Michael A. Shull, Superintendent, City of Los Angeles Department of Recreation and Parks, June 8, 2007.
facilities are too far away for on-site employees to access them during their lunch break. In
addition, it is not anticipated that Project Site employees would use County parks for
purposes related to their employment at the Project Site. A minor incremental increase in
usage may also result from the Project’s proposed hotel development; however, this is also
unlikely because the primary purpose of hotel guests’ stay would likely be to visit the tourist
attractions of the Project Site and the County facilities are relatively far away. Therefore,
while some increased demand is possible at County facilities, impacts, if any, would be less
than significant.

(3) Impacts under the No Annexation Scenario

(a) City of Los Angeles Facilities

Under the No Annexation scenario, approximately 1,178 of the Project’s 2,937
proposed residential units would be located within the City of Los Angeles and would
therefore increase the demand for City park and recreation facilities. Construction of these
new residential units would be projected to increase population within the City by
approximately 2,580 persons. As a result, the No Annexation scenario would generate
additional demand for City park and recreation facilities. The City has determined that the
existing supply of parks and recreational facilities is already inadequate in the Community
Plan area and that the Project under the No Annexation scenario would have a direct
impact on City parks and recreational facilities. This could potentially be a significant
impact.

Similar to the proposed Project, the No Annexation scenario would introduce a
system of parks and recreation facilities to help meet the recreation needs of additional
residents, and the proposed City Specific Plan would require the provision of park or
recreation space in an amount equal to 200 square feet per dwelling unit to meet the
recreation needs of residents. The implementation of a system of park space and
recreational facilities in accordance with Section 5 of the proposed City Specific Plan and
the Project’s Conceptual Park and Open Space Plan would help to alleviate some of the
additional demand on City park services and would provide the equivalent of 2.09 acres per
1,000 Project residents, which is higher than the existing ratio of 1.21 acres of parkland per
1,000 persons in the Community Plan Area. Similar to the proposed Project, the park
space to person ratio would meet the City’s short- and intermediate-range standard set
forth in the Public Recreation Plan.

As mentioned above, under the No Annexation scenario, the Project would add
park space and recreation facilities to the City system at a park ratio of 2.09 acres of park
space and recreational facilities per 1,000 residents. Although the City has indicated that
the Project would have a direct impact on City facilities, the Project would exceed the
acreage of neighborhood and community parks recommended by the Public Recreation Plan’s short- and intermediate-range standard and also raising the park ratio in the Community Plan area. As such, the provision of parks and recreation improvements in general accordance with the Project’s Conceptual Park and Open Space Plan would result in improvements to Project area parks and recreation facilities consistent with the City’s Public Recreation Plan. As development within the City under the No Annexation scenario would occur in accordance with the provisions of the proposed City Specific Plan, the provision of park space and recreation facilities under the No Annexation scenario would exceed the requirements of Los Angeles Municipal Code Sections 12.21.G, 12.33, 17.12, and 17.58, and impacts to City parks and recreation facilities would be reduced to a less than significant level.

Under the No Annexation scenario, impacts from the Project’s retail, commercial, entertainment, and hotel components on City parks facilities would be similar to those under the proposed Project. Although a slightly greater amount of these land uses would be located within the City under the No Annexation scenario, employees and visitors would not be the primary users of City parks. As such, these Project components would not add a measurable increase in demand on City facilities. As discussed above, with the implementation of the proposed City Specific Plan, impacts to City parks and recreation facilities would be reduced to a less than significant level.

(b) County of Los Angeles Facilities

Under the No Annexation scenario, 1,759 of the 2,937 proposed residential units would be located within unincorporated portions of the County of Los Angeles. Construction of these new residential units would be projected to increase the residential population within the unincorporated portion of the County of Los Angeles by approximately 3,870 persons. Since area residents would be the primary users of County facilities, an increase in demand at County facilities is anticipated. The County has indicated that existing facilities do not meet the needs of the residents in the Third Supervisorial District and that there is a deficiency of local and regional parkland. Further, the County indicated that because the existing county facilities within a two (2)-mile radius are performing arts centers that do not support regular recreational programming, that these facilities would not be able to provide for the Project’s increased residential population under the No Annexation scenario.410 This could be considered a significant impact. The County has

410 Public Service Response Letter from Bryan Moscardini, Development Facility Planner I, County of Los Angeles Department of Parks and Recreation, April 16, 2006.
indicated that it does not currently have any plans to develop parks or recreational facilities or expand existing facilities within a two (2)-mile radius of the Project Site.

As discussed above, the No Annexation scenario would introduce a system of parks and recreation facilities to help meet the recreation needs of additional residents, and the Project would provide park or recreation space in an amount equal to 200 square feet per dwelling unit to meet the recreation needs of residents. At buildout of all residential units in the County under the No Annexation scenario, a total of approximately 8.1 acres of park space and recreation facilities would occur in the County portion of the Project Site. The provision of on-site park and recreation areas would help to alleviate some of the additional demand on County park services and would provide 2.09 acres of park and recreation areas per 1,000 Project residents. However, this increase in park and recreation areas would not be sufficient to bring area parks up to County minimum standards of four (4) acres per 1,000 people for local parkland and six (6) acres per 1,000 people for regional parkland.

Although parks and recreation areas provided under the No Annexation scenario would not be sufficient to meet County standards for regional parkland, Section IV.A.1 (Land Use – Land Use Plans/Zoning), Subsection 2.e (Project Impacts – No Annexation Scenario), of this Draft EIR concludes that the 1,759 residential units located within the County portion of the Project Site under the No Annexation scenario would be in compliance with Los Angeles County Code Sections 22.08.080 H and 22.56.215, in that open space would comprise at least 25 percent of the net area of a residential development in an urban Hillside Management Area. For example, as discussed above, approximately 8.1 acres of park space and recreation facilities, as well as approximately 18.0 acres of hillside open space would be added within unincorporated portions of the County. As a result, the proposed total amount of open space represents approximately 42 percent of the 62.2 net acres of the residential development area within the County, which substantially exceeds the requirements of the County’s Hillside Management Area regulations.

Although the County has indicated that the Project would have a direct impact on park facilities under the No Annexation scenario, the project design features would ensure adequate parks and recreational facilities are available.

Under the No Annexation scenario, impacts from the proposed Project’s retail, commercial, entertainment, and hotel components would be similar to those under the proposed Project, and thus would not measurably increase the Project’s demand for parks and recreation facilities beyond that identified above. Therefore, with the implementation of the project design features, which would require the Applicant to construct parks and recreation improvements in accordance with the Project’s Conceptual Parks and Open
Space Plan, impacts to County parks and recreation facilities would be reduced to a less than significant level.

4. Cumulative Impacts

In order to assess cumulative impacts to City and County facilities, an analysis based on future population projections for the City and County park areas was performed. For the purpose of the Project’s population modeling and analysis, population projections have been broken down into geographic areas that correlate with City and County geographical areas for measuring parks and recreational facilities performance. For this analysis, the Community Plan boundaries were used for City facilities, whereas, the census tracts were used for County facilities. A cumulative impact for City and County park facilities is determined by comparing the forecasted population within the park service area to the City and County’s minimum average standards. A cumulative impact would occur if:

1. cumulative population increases would cause existing park and recreational facilities which adequately serve the existing population to exceed the capacity of the facilities, or
2. cumulative population increases substantively increase the demand for park and recreational facilities for which current demand exceeds the ability of a facility to adequately serve the population.

a. Cumulative Proposed Project Impacts

(1) City of Los Angeles Facilities

As noted above, the City is currently providing 1.21 acres of neighborhood and community park per 1,000 residents, which is below the Public Recreation Plan’s standards for neighborhood and community parks. As the population continues to grow in the surrounding area, increased demand would lower the existing parkland to population ratio in the absence of mitigation.

The 2-mile service area radius includes portions of both the Sherman Oaks - Studio City – Toluca Lake – Cahuenga Pass and Hollywood Community Plan areas. Based on the cumulative analysis performed for the Project, an increase of 16,383 persons would be added to the Sherman Oaks - Studio City – Toluca Lake – Cahuenga Pass and Hollywood Community Plan areas between 2010 and 2030, the year of Project buildout. To meet the minimum City population acreage to population standards, an additional approximately 32.8 acres of additional park and recreation space should be provided in the Community Plan areas to meet the service goals outlined in the Public Recreation Plan.

Therefore, based on the projected increase in cumulative demand, absent mitigation it is conservatively assumed that forecasted growth would result in a significant impact on
neighborhood and community parks and recreational facilities. However, with the construction of parks and recreation improvements in accordance with the requirements of Section 5 of the proposed City Specific Plan and the Project's Conceptual Park and Open Space Plan Project impacts would be less than significant. In addition, payment of Quimby fees or provision of parks space by related projects, and planned Department of Recreations and Parks acquisitions, as well as the use of school playgrounds would also address additional demand.

Therefore, while the forecasted growth without mitigation may result in a significant impact, the Project’s demand would be met through the implementation of the proposed City Specific Plan. As such, the Project would not contribute to cumulative impacts and a less than significant cumulative impact would result with regard to the proposed Project.

(2) County of Los Angeles Facilities

As noted above, the County has indicated that the area within a two (2)-mile radius of the Project Site does not currently meet the County’s acreage standards and has identified a deficiency in the Third Supervisorial District of 80 acres of local parkland (4 acres/1,000 residents for 20,067 residents, 0 acres currently provided) and a 29-acre deficiency of regional parkland (6 acres/1,000 residents for 20,067 residents, 85.2 currently provided outside of the 2-mile radius of the Project Site). As the population continues to grow in the surrounding area, increased demand would lower the existing parkland to population ratio in the absence of mitigation.

Based on the cumulative analysis performed for the Project, an additional 1,292 residents would be added within the County parks and facilities service area between 2010 and 2030, the year of Project buildout. To meet the minimum population acreage to population standards (i.e., four acres of local parkland per 1,000 residents), approximately six (6) acres of additional local park land should be provided.411

Therefore, based on the projected increase in cumulative demand, absent mitigation it is conservatively assumed that forecasted growth on County parks and recreational facilities would result in a significant impact. However, park facilities associated with new development, Quimby fees collected from residential land division projects, and planned

411 Although the two facilities identified within two (2) miles of the Project Site provide 104.22 acres of recreational facilities, these two (2) facilities are performing arts centers and do not support regular recreational programming; therefore, they have not been included as existing facilities.
b. Cumulative Impacts Under the No Annexation Scenario

The No Annexation scenario would result in a direct population growth of approximately 2,580 persons within a two (2)-mile radius of the Project Site by Project build out in 2030. Similar to the proposed Project, through the construction of public parks and recreation improvements in accordance with the Project’s Conceptual Parks and Open Space Plan Project impacts under the No Annexation scenario would be less than significant. Therefore, as is the case with the proposed Project, with implementation of the project design features, the Project under the No Annexation scenario would have the same less than significant cumulative impact on City and County facilities, as is the case with the proposed Project.

5. Project Design Features and Mitigation Measures

a. Project Design Features

Project Design Feature K.4-1: The Applicant or its successor shall provide park or recreation space in an amount equal to 200 square feet per residential unit within the Mixed-Use Residential Area to meet the recreation needs of residents. Park or recreation space provided anywhere within the Mixed-Use Residential Area shall satisfy this requirement for any particular residential development provided that such space will be accessible to the residents of such development. Required park and recreation space may be located at or above grade, or on rooftops. Parking areas, driveways, and service facilities shall not qualify as park and recreation space, except to the extent provided for the parks themselves. Required open park and recreation space may be provided in the form of courtyards, plazas, pedestrian paseos, private setbacks, roof terraces, gardens, picnic areas, playgrounds, exercise areas, trails, and sports related facilities (e.g., tennis courts, swimming pools, basketball courts) or other similar outdoor gathering places. Park and recreation space may be distributed throughout the Mixed-Use Residential Area. Required
publicly owned property. Parks shall be developed in general accordance with the Conceptual Parks and Open Space Plan. Prior to issuance of a building permit, the Applicant or its successor shall develop a parks phasing and implementation plan. The Department of Recreation and Parks may approve adjustments to the Conceptual Parks and Open Space Plan as necessary to achieve the intent of the Conceptual Parks and Open Space Plan and the goals of the City Specific Plan. In the event the proposed annexation does not occur (i.e., the existing jurisdictional boundaries remain and the Project is developed as proposed), the above provisions would also apply to the County portions of the Project Site, with the applicable agency being the County of Los Angeles Department of Parks and Recreation.

Project Design Feature K.4-2: Upon completion of the North-South Road and the realignment of Universal Studios Boulevard, the Applicant or its successor shall implement an on-site pedestrian/bicycle network with an alignment in substantial compliance with that shown on Figure 211, Pedestrian and Bicycle Network Proposed by the Proposed Project.

Project Design Feature K.4-3: All costs of construction and costs of providing equipment and improvements for the parks and recreation facilities, provided pursuant to Project Design Feature K.4-1 shall be the responsibility of the Applicant or its successor. In addition, the property owners association shall be responsible for ownership and maintenance of the aforementioned on-site parks and recreation facilities.

b. Mitigation Measures

With implementation of the above project design features the Project would result in less than significant impacts with regard to City and County park and recreation facilities. As Project impacts are less than significant, no mitigation measures are required.

6. Level of Significance After Mitigation

The City has determined that under the long-range criteria established in the Public Recreation Plan, the Project would exceed the ability of the City parks and recreation facilities within a two (2)-mile radius of the Project Site to adequately meet the demands of Project residents. This is considered a potentially significant impact. However, with the implementation of the project design features, the impacts to City parks and recreational
facilities would be reduced to a less than significant level. In addition, pursuant to the proposed City Specific Plan, Project development would satisfy all applicable Los Angeles Municipal Code requirements and thus, a less than significant impact would occur.

The County has determined that existing County facilities are currently inadequate to serve the service population of the Third Supervisional District and that future population growth can be expected to exacerbate this condition and contribute towards a further reduction in parks services to area residents. However, no population growth would occur under the proposed Project within the County and the County has determined that non-residential development does not increase the demand at County parks and recreational facilities. Therefore, impacts to County parks and recreational facilities under the proposed Project would be less than significant and no mitigation measures are required.

Under the No Annexation scenario, the Project would generate additional demand on City facilities, albeit to a lesser degree than the proposed Project. According to the City, City park facilities are not adequately meeting the current demands of the community based on current standards. This is considered a potentially significant impact. However, with the implementation of the project design features, the impacts to City parks and recreational facilities would be reduced to a less than significant level. In addition, development under the No Annexation scenario, as is the case with the proposed Project, would satisfy all applicable LAMC requirements pursuant to the proposed City Specific Plan, and thus, a less than significant impact would occur.

Additionally, the County has determined that County facilities are not adequately meeting the current demand in the Project area. Under the No Annexation scenario, the Project would generate additional demand on County parks and recreational facilities. This is considered a potentially significant impact. However, with the implementation of the project design features, potential impacts would be reduced to a less than significant level. Additionally, as discussed above and in Section IV.A.1 (Land Use – Land Use Plans/Zoning) of this Draft EIR, the No Annexation scenario would be in compliance with Los Angeles County Code Sections 22.08.080 H and 22.56.215, in that open space would comprise at least 25 percent of the net area of a residential development in an urban Hillside Management Area.