## IV. Environmental Impact Analysis

## J. 4 Public Services - Parks and Recreation

## 1. Introduction

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

## 2. Environmental Setting

## a. Existing Conditions

## (1) City of Los Angeles Department of Recreation and Parks

DRP is responsible for the establishment, operation, and maintenance of parks and recreational facilities in the City. Currently, the DRP operates and maintains 15,710 acres of parkland with 390 parks, nine lakes, 176 recreation centers, 372 children's play areas, 13 golf courses, 287 tennis courts, 9 dog parks, 59 swimming pools, and 7 skate parks. Nearly 13,000 acres of parkland are located in "Regional Parks" (more than 50 acres in size). The City conservatively omits regional parks from its park-to-population ratio because these parks are not distributed evenly across all areas of the City. The DRP also provides other recreational services including senior activities, meal programs, afterschool and day care for children, teen clubs, as well as basketball, volleyball, softball and flag football games and leagues. Table IV.J-21 on page IV.J-91 shows the 2008 inventory of parkland in the City.

The Project site is located in the Griffith-Metro Region of DRP's jurisdiction. As shown in Figure IV.J-13 on page IV.J-92, there are a number of parks and recreation facilities located within approximately two miles of the Project site. Table IV.J-22 on page IV.J-93 lists the distance, size, type of park, and amenities for the public parks and recreational facilities within approximately two miles of the Project site.

The Project site is immediately north of Exposition Park, a public-serving regional park containing a variety of cultural and athletic venues. Exposition Park includes the Los Angeles Memorial Coliseum, the California Science Center, the California African American Museum, the Los Angeles Sports Arena, Exposition Park Rose Garden, Exposition Park Intergenerational Community Center, Natural History Museum of Los Angeles County, and the Science Center School and Amgen Center for Science Learning.

## (2) University of Southern California

The University operates and maintains its own system of private parks and recreation facilities. The University Park Campus (Campus) includes an array of active recreation facilities and passive park space. Among the active recreation facilities are athletic fields and facilities that primarily serve the University population. ${ }^{89}$ Within the Campus, there are approximately 12.7 acres of outdoor active open space (excluding indoor active recreation facilities) which include the Dedeaux Baseball Field, Howard Jones Football Practice Field, and Marks Tennis Stadium. These facilities are scheduled for USC Athletic Department use only. However, special events may be booked subject to USC permission. Furthermore, the USC Galen Center and Athletic Pavilion provides additional indoor active recreation space for the USC basketball team and University students. In addition, the University operates the Lyon Center, which includes basketball, badminton and volleyball courts, a weight room, an auxiliary gym, a fitness room, a stretching room, racquetball and squash courts, a climbing wall, ping pong tables, a group exercise studio and a sauna and jacuzzi. The University also operates the Physical Education Building, which includes two gyms, men's and women's locker rooms, dance rooms, multi-purpose courts used for racquetball and handball, and an indoor swimming pool.

The University's active recreation facilities are further complemented by an extensive network of passive park spaces that are strategically scattered throughout the Campus. Along with numerous small open space areas, the Campus includes parks and plazas (including but not limited to McCarthy Quad, Franklin Library Garden, Alumni Park, Founders Park, Hahn Plaza, John C. Argue Plaza, Robert D. Wood Plaza and Associates Park), which feature expansive lawns, manicured gardens, and park benches. ${ }^{90}$ Passive open space on the Campus totals approximately 31.7 acres. Table IV.J-23 on page IV.J-96

[^0]Table IV.J-21
Inventory of Parkland in the City of Los Angeles

| Park Type | City Owned Inventory (acres) | Other Service Provider Inventory (acres) | Total Combined Inventory ${ }^{\mathrm{a}, \mathrm{b}}$ (acres) | Current Service Level |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Mini Parks/Pocket Parks (less than 1 acre) | 48 | 3 | 50 | 0.013 acres per | 1,000 |
| Neighborhood Parks (1-10 acres) | 728 | 46 | 774 | 0.198 acres per | 1,000 |
| Community Parks (10-50 acres) | 2,589 | 377 | 2,966 | 0.759 acres per | 1,000 |
| Regional and Large Urban Parks (+50 acres) | 12,356 | 19,924 | 32,289 | 8.261 acres per | 1,000 |
| Total ${ }^{\text {b }}$ | 15,730 | 20,350 | 36,080 | 9.231 acres per | 1,000 |

a Does not include private holdings of parkland.
${ }^{b}$ Totals may not add exactly due to rounding of numbers.
Source: Los Angeles Recreation and Parks Department, Citywide Community Needs Assessment, Summary Report, 2009.
provides specific details of the University's open space and recreation facilities. Figure IV.J-14 on page IV.J-99 shows the locations of the University's open space and recreational facilities. As indicated therein, the University's on-Campus open space and recreational facilities combine to create a park-like Campus setting.

The McAlister Soccer Field is also located north of the Campus at the southeast corner of Hoover Street and West $30^{\text {th }}$ Street. The Lyon Center, Physical Education Building and McAlister Soccer Field are open to USC students, faculty, and staff with valid current USC identification. In addition, the McDonald's Swim Stadium is located in the northwest corner of the Campus near the intersection of McClintock Avenue and Jefferson Boulevard and has two outdoor pools that are available for recreational swimming. USC alumni and guests, who include family members of USC faculty as well as the general community, may also utilize USC's recreational facilities (i.e., Lyon Recreation Center and Physical Education Building) by purchasing a membership. ${ }^{91}$

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Figure IV.J-13
Existing Public Parks and Recreational Facilities Within Approximately Two Miles of Project Site

Table IV.J-22
Existing Public Parks and Recreational Facilities in the Project Vicinity

| $\begin{aligned} & \text { Map } \\ & \text { No. }{ }^{\text {a }} \end{aligned}$ | Facility and Address | Distance from Project Site ${ }^{\text {b }}$ | Type of Park | Amenities |
| :---: | :---: | :---: | :---: | :---: |
| 1 | Saint James Park <br> Adams Boulevard and Severance Street | 0.62 Mile | Pocket Park | Children's Play Area, Sand Box |
| 2 | Hoover Recreation Center 1010 West $25^{\text {th }}$ Street | 0.70 Mile | Recreation Center | Auditorium, Barbecue Pits, Basketball Courts (Unlighted/Outdoor), Children's Play Area, Indoor Gym (with Weights), Picnic Tables, Gymnasium |
| 3 | Exposition Park and Expo Center 3980 South Menlo Avenue | 0.80 Mile | Regional Park and Recreation Center | Swim Stadium, Senior Center, Rose Garden, PreSchool, Recreation Center, Amphitheatre |
| 4 | Curtis (Roland) Park 1287 West $38^{\text {th }}$ Place | 0.84 Mile | Pocket Park | No Information Available |
| 5 | Denker Recreation Center 1550 West $35^{\text {th }}$ Place | 0.97 Mile | Recreation Center | Baseball Diamond (Unlighted), Basketball Courts (Lighted/Indoor), Basketball Courts (Unlighted, Outdoor), Children's Play Area, Community Room, Football Field (Unlighted), Indoor Gym (Without Weights), Picnic Tables, Soccer Field (Unlighted) |
| 6 | Loren Miller Recreation Center 2717 Halldale Avenue | 1.00 Mile | Recreation Center | Basketball Courts (Lighted/Outdoor), Children's Play Area, Picnic Tables, Tennis Courts (Lighted) |
| 7 | Toberman Recreation Center 1725 Toberman Street | 1.22 Miles | Recreation Center | Auditorium, Barbecue Pits, Baseball Diamond (Lighted), Basketball Courts (Lighted/Indoor), Basketball Courts (Lighted/Outdoor), Children's Play Area, Community Room, Indoor Gym (without Weights), Picnic Tables |
| 8 | Pico Union Park <br> 1827 South Hoover Street | 1.25 Miles | Pocket Park | Children's Play Area, Picnic Tables |
| 9 | Martin Luther King Jr. Therapeutic Recreation Center 3916 South Western Avenue | 1.36 Miles | Recreation Center | Universally Accessible Playground, Baseball Diamond (Lighted), Basketball Court (Lighted/Outdoor), Children's Play Area, Picnic |

Table IV.J-22 (Continued)
Existing Public Parks and Recreational Facilities in the Project Vicinity

| $\begin{array}{c}\text { Map } \\ \text { No. }\end{array}$ | Facility and Address | $\begin{array}{c}\text { Distance from } \\ \text { Project Site }\end{array}$ | Type of Park |  |
| :---: | :--- | :---: | :---: | :--- |
| 10 | $\begin{array}{l}\text { Trinity Recreation Center } \\ 2416 \text { Trinity Street }\end{array}$ |  | $\begin{array}{l}\text { Amenities }\end{array}$ |  |
| 11 | $\begin{array}{l}\text { Alvarado Terrace Park } \\ \text { Malvern Avenue and Alvarado Terrace, Tennis Court (Lighted), Auditorium/Multi- } \\ \text { Purpose Room }\end{array}$ |  |  |  |
| 12 | $\begin{array}{l}\text { Normandie Recreation Center } \\ 1550 \text { South Normandie Avenue }\end{array}$ | 1.45 Miles | Recreation Center | $\begin{array}{l}\text { Auditorium, Basketball Courts (Lighted/Outdoor), } \\ \text { Children's Play Area, Gymnasium }\end{array}$ |
| 13 | $\begin{array}{l}48 \text { Miles } \\ 4800 \text { Street Park }\end{array}$ | Pouth Hoover Street | 1.62 Miles | Recreation Center | \(\left.\begin{array}{l}Auditorium, Baseball Diamond (Lighted), Basketball <br>

Courts (Lighted/Indoor), Basketball Courts <br>
(Lighted/Outdoor), Children's Play Area, Community <br>
Room, Handball Courts (Lighted), Picnic Tables\end{array}\right]\)

Table IV.J-22 (Continued)
Existing Public Parks and Recreational Facilities in the Project Vicinity

| $\begin{aligned} & \text { Map }_{\text {ap }}^{\text {No. }} \end{aligned}$ | Facility and Address | Distance from Project Site ${ }^{\text {b }}$ | Type of Park | Amenities |
| :---: | :---: | :---: | :---: | :---: |
|  | $24132^{\text {nd }}$ Avenue |  |  | Tables, South Seas House |
| 18 | Seoul International Park 3250 San Marino Street | 2.08 Miles | Recreation Center | Auditorium, Baseball Diamond (Lighted), Children's Play Area, Indoor Gym (without Weights), Picnic Tables, Jogging Path |
| 19 | Central Park Recreation Center 1357 East $22^{\text {nd }}$ Street | 2.09 Miles | Recreation Center | Basketball Courts, Children's Play Area, Pool |
| 20 | Central Avenue Pocket Park 4222 Central Avenue | 2.13 Miles | Pocket Park | Children's Play Area, Bandstand |
| 21 | Hope and Peace Park 843 South Bonnie Brae Street | 2.13 Miles | Pocket Park | Basketball Hoop, Benches |
| 22 | Barry White Recreation Center 345 East 51 ${ }^{\text {st }}$ Street | 2.16 Miles | Recreation Center | Baseball Diamond (Lighted), Basketball Courts (Lighted/Outdoor), Children's Play Area, Picnic Tables, Seasonal Pool (Outdoor/Unheated), Tennis Courts (Lighted), Gymnasium, Pool |
| a The Map Numbers Correspond with Figure IV.J-13 on page IV.J-92. <br> ${ }^{b}$ Distances Represent Driving Distances. |  |  |  |  |
| Source: City of Los Angeles, Department of Recreation and Parks Facility Locator, http://www.laparks.org, accessed December 14, 2009. |  |  |  |  |

Table IV.J-23
Existing USC Parks and Recreational Facilities

|  | Facility Name (map symbol) | Location | Amenities |
| :---: | :---: | :---: | :---: |
|  | Tennis Courts (TCX) | Northwestern portion of Subarea 1, West of McClintock Avenue | 6 tennis courts |
|  | Marks Tennis Stadium (MTS) | Northwestern portion of Subarea 1, West of McClintock Avenue | 5 tennis courts |
|  | Dedeaux Baseball Field (BDX) | Northwestern portion of Subarea 1, West of McClintock Avenue | Baseball diamond and stadium seating |
|  | Lyon Recreational Center (LRC) | Northwestern portion of Subarea 1, West of McClintock Avenue | Gymnasium, aerobics, racquetball, etc. |
|  | MacDonald Swim Stadium (MAC) | Northwestern portion of Subarea 1, West of McClintock Avenue | Olympic-size swimming pool, diving boards and stadium seating |
|  | Howard Jones Field (FPF) | Northwestern portion of Subarea 1, West of McClintock Avenue | Full-size football field |
|  | Brian Kennedy Field (BKF) | Northwestern portion of Subarea 1, West of McClintock Avenue | Full-size football field |
|  | Cromwell Track and Field (CFX) | Northwestern portion of Subarea 1, East of McClintock Avenue | Olympic scale track and field facility |
|  | Physical Education Building (PED) | Central Campus, Watt Way between Hellman Way and Childs Way | Gymnasium, studios, weight rooms |
|  | Figueroa Courts (FIG) | Eastern portion of Campus, adjacent to Figueroa Avenue | 2 basketball courts, 1 volleyball court |
|  | Galen Events Center (GEP) | Intersection of Jefferson Blvd. and Figueroa Avenue | Basketball Arena |
|  | Galen Athletic Pavilion (GAP) | Intersection of Jefferson Blvd. and Figueroa Avenue | Basketball practice courts and weight room |
|  | McAllister Soccer Field (MAC) | Subarea 3, intersection of 30 ${ }^{\text {th }}$ and Hoover | Full-size soccer field |

${ }^{88}$ University of Southern California, June 12, 2009.

Table IV.J-23 (Continued) Existing USC Parks and Recreational Facilities

|  | Facility Name (map symbol) | Location | Amenities |
| :---: | :---: | :---: | :---: |
|  | Alumni Park | Eastern portion of Subarea 1, Trousdale Parkway between Hellman Way and Childs Way | Manicured gardens, walking paths, seating, water feature |
|  | Amelia Taper Gardens | Northern portion of Subarea 1, on Trousdale Parkway | Seating, shade |
|  | Archimedes Plaza | West of Watt Way between Bloom Walk and Downey Way in the western portion of Subarea 1 | Hardscaping, landscaping, seating, shading, water feature |
|  | Argue Plaza | Southeastern portion of Subarea 1, east of Doheny Library | Lawn, rose garden, water feature, seating |
|  | Associates Park | Central Subarea 1 | Lawn, seating, shading, walking paths |
|  | Bogardus Courtyard | East of Trousdale Parkway in Subarea 1 | Sunken Plaza with seating |
|  | Crocker Plaza | Southern portion of Subarea 1, just north of Exposition Blvd. | Seating, shading |
|  | E.F. Hutton Park | Central Subarea 1, south of West $34{ }^{\text {th }}$ St. | Expansive lawn |
|  | Founders Park | Central Subarea 1 | Expansive lawn and earthen berms, seating, shading, walking paths |
|  | Franklin Library Garden | Subarea 1, Hellman Way, south of McCarthy Quad | Seating, water feature |
|  | Froelich Gateway and Grove | Southern portion of Subarea 1, just north of Exposition Blvd. | Expansive lawn |
|  | Gabilan Courtyard | Northeastern portion of Subarea 1, just north of West $34^{\text {th }}$ St. | Hardscaping with seating |
|  | Garden Plaza | Southeastern portion of Subarea 1, located between Lewis Hall and the University Club | Small hardscaped courtyard, tables and chairs |
|  | Gavin Herbert Plaza | Located at the northern terminus of Trousdale Parkway, between West $34^{\text {th }}$ St. and Jefferson Blvd. | Hardscaping, landscaping, seating, water feature |
|  | Hahn Plaza | Central Subarea 1 | Seating, water feature, adjacent to Tommy Trojan and student center |

Table IV.J-23 (Continued) Existing USC Parks and Recreational Facilities

|  | Facility Name <br> (map symbol) |  | Amenities |
| :--- | :--- | :--- | :--- |

Source: University of Southern California and Matrix Environmental, 2010.


Page IV.J-99

## b. Regulatory Framework

## (1) State Level

(a) Quimby Act

Section 66477 of the California Government Code, also known as the Quimby Act, was enacted in an effort to promote the availability of park and open space areas in response to California's rapid urbanization and decrease in the number of parks and recreational facilities. The Quimby Act authorizes cities and counties to enact ordinances requiring the dedication of land, or the payment of fees for park and/or recreational facilities in lieu thereof, or both, by developers of residential subdivisions as a condition to the approval of a tentative map or parcel map. Thus, Los Angeles Municipal Code (LAMC) Section 17.12 was authorized pursuant to the Quimby Act.

Under the Quimby Act, requirements for parkland dedications are not to exceed three acres of parkland per 1,000 persons residing within a subdivision, and in-lieu fee payments shall not exceed the proportionate amount necessary to provide three acres of parkland, unless the amount of existing neighborhood and community parkland exceeds that limit. As indicated above, the current ratio of Citywide parkland which includes regional park space is 9.231 acres per 1,000 persons.

## (2) Local Level

The DRP has completed a number of planning documents that address the need for parks and recreational facilities within the City of Los Angeles. The most recent document completed by DRP is a Citywide Community Needs Assessment. In addition, the City of Los Angeles General Plan indicates that the adequacy of the public park and recreation system is based on three general standards: (1) sufficient land area reserved for parks and recreation; (2) appropriate distribution of park and recreation facilities throughout the City; and (3) a full complement of park and recreation facility types (i.e., active and passive recreation for all age groups) to accommodate a wide variety of users. The General Plan further states that parks and recreational facilities should be provided at the neighborhood, community, and regional levels.

The Public Recreation Plan (PRP), a component of the City's General Plan, establishes policies and standards related to parks, recreation facilities, and open space areas in the City. The PRP provides citywide goals, objectives, and recommendations concerning parks and recreation facilities. In addition to the City standards established in the PRP, park and open space requirements pursuant to the Quimby Act are also set forth in Sections 12.33 and 17.12 of the LAMC. The following provides information regarding the

Citywide Community Needs Assessment, PRP and applicable LAMC standards and requirements.

## (a) Citywide Community Needs Assessment

The DRP has completed a Citywide Community Needs Assessment (Assessment). The Assessment examined current and future recreational needs in the City as a first step in developing a Citywide park master plan and a five year capital improvement plan. The overall objectives of the Assessment were to address needs for additional recreation facilities and park land, identify improvements to facilities to meet current and future demands, prevent future maintenance issues, and offer positive alternatives to an increasingly dense and urbanized population. ${ }^{90}$ The Assessment provides a number of key recommendations to be implemented through a detailed master planning process. These recommendations include, but are not limited to, working with the City's Planning Department to modify Section 17.12 of the LAMC and update the PRP, developing an updated pricing and revenue plan to offset capital and operational costs, and implementing a land acquisition strategy involving developer impact agreements based on the standards for open space desired. ${ }^{91}$

Based on the Assessment, the expectation as to how far people are willing to travel to parks and recreational facilities has changed drastically since the time that the PRP was adopted in 1980 (discussed below). Specifically, sixty-three percent ( 63 percent) of survey respondents for the Assessment stated that they would travel at least one mile to visit a neighborhood park and thirty-eight ( 38 percent) of respondents would travel at least two miles. Additionally, seventy-one percent (71percent) of respondents would travel at least two miles to visit a community park and thirty-seven percent (37 percent) of respondents would travel more than three miles to visit a community park. Given the accessibility of public transit, it is now easy and convenient for people to access parks further than a half mile from their place of residence.

The Assessment also made the following findings:

- The City lacks the appropriate levels of neighborhood and community parks that are close to home and parks are not equitably distributed.

[^2]- The amount of park land available in the City is low for the level of density in the City and people would like more land for mini-parks, neighborhood parks, community parks and downtown parks. More parks are needed in redevelopment areas.
- There is a concern that some parks are unsafe and controlled by gangs and lack significant security, keeping people from using the park in a productive manner.
- Parks are in need of infrastructure improvements to restrooms, parking areas, playgrounds, picnic facilities, sports courts, security lighting, irrigation systems, and sports fields. Poor general site conditions encourage vandalism and keep the community from using the parks in a positive manner.
- Sports fields are a needed amenity.
- Sustainable landscapes in parks are an important design element that the DRP should incorporate into design standards.
- Some existing parks are outdated in design. The DRP needs to develop new design standards for parks in the future and customize the parks to the people living in the area that will be using the park.
- Walkability of the City and the ability to walk in City parks are important.
- The DRP must create a balance of park types and manage by park and amenity standards that promote equal access.
- Many citizens indicate that parks were overused on weekends.
- Los Angeles River improvements were brought forward as opportunity sites that could be developed and improved for parks and recreation purposes.


## (b) Public Recreation Plan

Adopted in 1980 by the Los Angeles City Council, the PRP focuses on the development of physical facilities by emphasizing the provision of neighborhood and community recreation sites, including community buildings, gymnasiums, swimming pools,
and tennis courts. ${ }^{92}$ To a larger extent, the PRP focuses on facility planning in residential areas, as these areas generate the greatest demand for parks and recreational facilities. The PRP also establishes general locations for future facilities based on a proposed service radius and projected population levels.

According to the standard park characteristics identified in the PRP, park facilities are discussed in terms of local parks and regional facilities. Local parks include neighborhood and community recreation sites, open space, and "small" parks, which are usually characterized as less than one acre in size. A neighborhood park typically provides space and facilities for outdoor and indoor recreation activities intended to serve residents of all ages within the immediate neighborhood. Neighborhood parks typically include a recreation building, multi-purpose field, hard court area, play apparatus, picnic area, offstreet parking, and a maintenance area. Although the ideal size for a neighborhood park is considered to be ten acres, such parks within the City of Los Angeles are typically one to five acres in size. Community parks are designed to serve residents of all ages in several surrounding neighborhoods and include such facilities as community buildings, multipurpose fields, hard court areas, parking, maintenance service areas, and play areas. These facilities may also include baseball diamonds, football and soccer fields, tennis and handball courts, and a swimming pool. According to the PRP, the ideal size for a community park is considered to be 15 to 20 acres.

The PRP also states that the location and allocation of acreage for neighborhood and community park and recreational facilities should be determined on the basis of the service radius within residential areas throughout the City. The desired long-range standard for local parks is based on a minimum of two acres per 1,000 persons for neighborhood parks with a service radius of 0.5 miles, and a minimum two acres per 1,000 persons for community parks with a service radius of two miles. However, the PRP 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 acre per 1,000 persons within a one-mile service radius for neighborhood parks and one acre per 1,000 persons within a two mile service radius for community parks. These standards are Citywide goals and are not intended to be requirements for individual development projects. Furthermore, as indicated above, the Citywide Community Needs Assessment states that since the time that the PRP was adopted in 1980, the expectation as to how far people are willing to travel to parks and recreational facilities has changed

[^3]drastically. Given the accessibility of public transit, it is now easy and convenient for people to access parks further than a half mile from their place of residence.

## (c) Los Angeles Municipal Code

Section 12.21 of the LAMC requires that all residential developments containing six or more dwelling units on a lot provide, at a minimum, the following usable open space area per dwelling unit: 100 square feet for each unit having less than three habitable rooms, 125 square feet for each unit having three habitable rooms, and 175 square feet for each unit having more than three habitable rooms. Section 12.21 of the LAMC also identifies what areas of a project would qualify as usable open space for the purposes of meeting the project's open space requirements. Usable open space is defined as areas designated for active or passive recreation and may consist of private and/or common areas. Common open space areas must be readily accessible to all residents of the site and constitute at least 50 percent of the total required usable open space. Common open space areas can incorporate recreational amenities such as swimming pools, spas, children's play areas, and sitting areas. A minimum of 25 percent of the common open space area must be planted with ground cover, shrubs, or trees. In addition, indoor recreation amenities cannot constitute more than 25 percent of the total required usable open space. Private open space is defined as area which is contiguous to and immediately accessible from an individual dwelling unit and which contains a minimum of 50 square feet, of which no more than 50 square feet per dwelling unit is counted towards the total required usable open space. Private open space may not have a dimension of less than six feet in any direction.

In addition, Section 17.12 of the LAMC, authorized under the Quimby Act requires developers of residential subdivisions to set aside and dedicate land for park and recreational uses and/or pay in-lieu fees for park improvements. The area of parkland within a subdivision that is required to be dedicated is determined by the maximum density permitted by the zone within which the development is located.

If the developer does not meet the full parkland dedication requirement, fees for park improvements may be paid to the DRP in lieu of the dedication of all or a portion of all the land. The in-lieu fees are calculated per dwelling unit to be constructed based on the zoning of the project site and must be paid prior to the issuance of building permits. These fees are adjusted annually.

Section 17.12 of the LAMC allows recreation areas developed on the project site for use by the particular project's residents to be credited against the project's land dedication requirement. Recreational areas that qualify under this provision of Section 17.12 include, in part, swimming pools and spas (when the spas are an integral part of a pool complex) and children's play areas with playground equipment comparable in type and quality to
those found in City parks. Furthermore, the recreational areas proposed as part of a project must meet the following standards in order to be credited against the requirement for land dedication: (1) each facility is available for use by all residents of a project; and (2) the area and the facilities satisfy the park and recreation needs of a project so as to reduce that project's need for public park and recreation facilities. In addition, Section 17.12 provides that outdoor landscaped area may be credited against the project's land dedication requirement if approved by the Advisory Agency.

Consistent with Section 17.12, Section 12.33 of the LAMC prohibits the rezoning of a property to permit a multiple residential use in any multiple residential or commercial zone unless a dedication of parkland has been made or assured or a payment in lieu thereof has been made or guaranteed. The parkland dedicated and/or the in-lieu payment are subject to the restrictions, conditions, exemptions and credits of Section 17.12. The parkland dedication or payment must be made in accordance with the provisions of Section 17.12, and is based upon the maximum number of dwelling units permitted by the requested zone or upon the number of dwelling units which may be constructed.

## (d) South Los Angeles and Southeast Los Angeles Community Plans

The Project site is located in the South Los Angeles and Southeast Los Angeles Community Plan areas. ${ }^{93}$ The Community Plans for these areas both contain the Recreation and Parks Facilities goal to provide adequate recreation and park facilities that meet the needs of the residents in their plan area. In addition, Objective 4-1 within both of these Community Plans is to conserve, maintain, and better utilize existing recreation and park facilities that promote the recreational needs of the community. Both the South Los Angeles and the Southeast Los Angeles Community Plans also include the open space goal of maintaining a community with sufficient open space in balance with new development to serve recreational, environmental, health, and safety needs and to protect environmental and aesthetic resources. In addition, Objective 5-1 of both Community Plans is to preserve existing open space resources and, where possible, develop new open space.

[^4]
## 3. Environmental Impacts

## a. Methodology

Potential Project impacts on parks and recreation facilities and services were analyzed by: (1) reviewing the existing parks and recreation facilities in the Project vicinity; (2) projecting the future 2030 University student, faculty, and staff 2030 population associated with the proposed Project; and (3) evaluating the demand for parks and recreation service anticipated at the time of Project buildout compared to the expected level of service available, considering both DRP recreation facilities as well as USC's recreation facilities. The analysis also considers whether the proposed Project would conflict with the parks and recreation standards set forth in regulatory documents (i.e., Quimby Act and LAMC). Furthermore, the analysis also considers how the proposed Project affects the Citywide parkland standards set forth in the PRP. As previously noted, the PRP parkland standards are Citywide goals and are not requirements for individual development projects.

## b. Significance Thresholds

Appendix G of the CEQA Guidelines provides a sample question that addresses impacts with regard to other public facilities (e.g., parks). This question is as follows:

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- Parks?

In the context of this question, the City of Los Angeles CEQA Thresholds Guide states that the determination of significance for impacts on parks and recreation 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 build-out compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand.
- Whether the project includes features that would reduce the demand for recreation and park services (e.g., on-site recreation facilities, land dedication or direct financial support to the Department of Recreation and Parks).

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

- The proposed 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

The proposed Project would provide for new open space areas and landscaping that would integrate new buildings and enhance the existing character of the Project site and surrounding area, while serving the recreational needs of Project students and the community. Open space may be located at or above grade, or on rooftops and may include courtyards, plazas, pedestrian paseos, pedestrian streets, roof terraces, gardens, other similar outdoor gathering places, and athletic courts and fields.

In particular, new pedestrian pathways and landscaping would be designed to reinforce the park-like, Campus setting in Subarea 1. Within Subarea 2, new landscaped areas and pedestrian pathways would integrate new buildings and buildings to remain. Subarea 3 would include various landscaped pedestrian pathways as well as open space areas. An approximately 20,000 square foot fitness center would be provided as part of the proposed building development in Subarea 3. Additionally, in Subarea 3, an approximately 141,500 square foot athletic open space area would be provided on the rooftop of the eastern parking garage. ${ }^{94}$ An estimated 10.57 acres of passive open space areas, including outdoor plazas and landscaped areas would also be provided within Subarea 3A. As shown in Table IV.J-24 on page IV.J-108, a total of 14.28 acres of active and passive open space would be provided as part of the proposed Project

For the new student, faculty, and staff housing uses in Subarea 3A, a minimum total of 100 square feet of open space area would be provided for each unit consisting of

[^5]| Table IV.J-24Proposed Parks and Open Space |  |  |
| :---: | :---: | :---: |
|  | Minimum Amount Proposed |  |
| Open Space Proposed | Square Feet | Acres |
| Athletic Area on Rooftop of Parking | 141,500 | 3.25 |
| Fitness Center | 20,000 | 0.46 |
| Passive Open Space Within Subarea 3 | 429,800 | 10.57 |
|  | Total | $14.28{ }^{\text {a }}$ |
| a This number is conservative as it excludes additional open space to be provided in Subareas 1 and 2. <br> Source; Matrix Environmental, 2010 |  |  |

common or private open space areas. ${ }^{95}$ Common residential open space areas would be accessible to all residents and open to the sky, except for a recreation room.

Additionally, common open space area would be a minimum of 400 square feet in area, with no horizontal dimension less than 15 feet. Recreation rooms of at least 600 square feet may qualify for up to 25 of the total open space area.

All planted areas would be designed and installed in compliance with the landscaping guidelines as provided in the proposed Project's proposed Urban Design Guidelines (see Section II, Project Description). All required setback areas not occupied by driveways or pedestrian paths would be landscaped. Common residential open space area including plazas, paseos, and courtyards would contain a minimum of 25 percent planted area, including trees, shrubs, and/or groundcovers (with the exception of the rooftop athletic area in Subarea 3A which may be constructed with an artificial surface and would not be required to contain any planted areas). All planted areas would conform to the City's water conservation requirements.

[^6]
## d. Analysis of Proposed Project Impacts

## (1) Impacts on Existing Parks and Recreation Facilities

The proposed Project is intended to serve the existing University population as well as small annual increases in student enrollment, staff, and faculty through the year 2030. Based on historic University growth, it is anticipated that by the year 2030 the University community will be composed of approximately 18,500 undergraduate students, 17,500 graduate students, 1,900 full-time faculty, and 8,700 staff workers. When compared with recent 2009 enrollment and staffing, this represents an increase of approximately 2,100 undergraduate students, 4,000 graduate students, 380 full and parttime faculty, and 1,407 staff workers over a 21-year period. Adjunct professors and lecturers would also continue to be present on site. As described above, USC owns and maintains its own system of private parks and recreational facilities that it continuously enhances and enlarges to meet the demands of the University community. It is anticipated that the much of the additional demand for park and recreational services generated by University student, faculty, and staff growth through 2030 would be accommodated by USC's own open space and recreational system.

Notwithstanding, development of the proposed Project would increase the number of residents in the Griffith-Metro Region of DRP's jurisdiction. Specifically, as provided in Section IV.I.3, Population, of this Draft EIR, the proposed Project's 250 faculty units could generate a residential population of approximately 418 persons in the Project area. ${ }^{96}$ In addition, conservatively assuming that all of the new graduate beds would be occupied by students that currently reside outside of the Griffith-Metro Region, the new graduate beds would generate an additional residential population of approximately 3,240 persons. While it is anticipated that a large portion of the net new 998 undergraduate student beds would be occupied by students already living within the Griffith-Metro Region, for purposes of providing a conservative analysis, it is assumed that the net new 998 undergraduate student beds would generate a residential population of 998 new persons within the Project area. ${ }^{97}$ Thus, when accounting for the new faculty units and net new student beds to be provided by the proposed Project, it is conservatively assumed that a new direct residential population of 4,656 persons within the Griffith-Metro Region would result from implementation of the

[^7]proposed Project. ${ }^{98}$ In addition, as discussed in Section IV.I.3, Population, of this Draft EIR, the proposed Project would also generate indirect growth of approximately 4,432 persons, some of whom may ultimately reside within the Griffith-Metro Region.

USC's open space areas and recreational facilities would be available to University students, staff, and faculty members. Guests, who include family members of USC faculty as well as the general community, may also utilize USC's recreational facilities (i.e., Lyon Recreation Center and Physical Education Building) by purchasing a membership. ${ }^{99}$ In addition, as previously described, the proposed Project would provide for new open space and landscaped areas as well as an athletic area and a fitness center in Subarea 3 to meet the recreational needs of the University community. Through the proposed Project's provision of approximately 14.28 acres of open space and recreational facilities as well as the availability of the existing University recreation facilities and open space, the proposed Project's demand for parks and recreation facilities would be adequately met. Thus, the proposed Project would not substantially increase the use of off-site neighborhood and regional parks and recreational facilities, nor would it substantially increase demand for recreation programs. Project impacts on parks and recreation facilities would be less than significant.

## (2) Consistency with Plans and Regulations

## (a) Public Recreation Plan

As indicated above, the PRP establishes a desired long-range Citywide standard for local parks of two acres per 1,000 persons within a half-mile radius for neighborhood parks and two acres per 1,000 persons within a two-mile radius for community parks. However, as discussed above, the PRP 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 acre per 1,000 persons within a one-mile radius for neighborhood parks and one acre per 1,000 persons within a two-mile radius for community parks. As previously noted, the PRP parkland standards are Citywide goals and are not requirements for individual development projects.

[^8]Development of the proposed Project would increase the number of residents in the Griffith-Metro Region of DRP's jurisdiction. As indicated in Section IV.I.3, Population, of this Draft EIR, the proposed Project's development of 250 faculty units could generate a residential population of approximately 418 persons. ${ }^{100}$ In addition, conservatively assuming that all of the new graduate beds would be occupied by students that currently reside outside of DRP's Griffith-Metro Region area, the new graduate beds would generate an additional residential population of approximately 3,240 persons. While it is anticipated that a large portion of the net new 998 undergraduate student beds ${ }^{101}$ would be occupied by students already living within the Griffith-Metro Region area, for purposes of providing a conservative analysis, it is assumed that the net new 998 undergraduate student beds would generate a residential population of 998 new persons within the Griffith-Metro Region area. Thus, when accounting for the new faculty units and net new student beds to be provided by the proposed Project, it is conservatively assumed that a new direct residential population of 4,656 persons would result from implementation of the proposed Project. ${ }^{102}$

With regard to the PRP standards for neighborhood parks, based on the conservative population assumptions described above, 9.31 acres of neighborhood parkland would need to be provided to meet the PRP's long-range standard of two acres per 1,000 residents and approximately 4.66 acres would need to be provided to meet the PRP's more attainable short- and intermediate-range standard of one acre per 1,000 residents. In addition, relative to the PRP standards for community parks, 9.31 acres of community parkland would need to be provided to meet the PRP's long-range standard of two acres per 1,000 residents and approximately 4.66 acres would need to be provided to meet the PRP's more attainable short- and intermediate-range standard of one acre per 1,000 residents.

Within Subarea 3, the proposed Project would provide approximately 141,500 square feet (approximately 3.25 acres) of active recreational space that would consist of an athletic area and a 20,000 square foot (approximately 0.46 acre) fitness center. In addition, the proposed Project would provide approximately 10.57 acres of open space, which, as indicated above, may be credited against a project's land dedication requirement if approved by the Advisory Agency. The proposed Project would also comply with the

[^9]requirements of 17.12 with regard to the provision of recreational space for the new faculty units (refer to discussion below). Furthermore, the existing USC open space and recreational facilities within the Project vicinity would also assist in ensuring that the demand for facilities generated by the proposed Project would be adequately met. Thus, while the proposed Project may not meet the PRP's long-range standard for parks and recreational space, it would exceed the more attainable short- and intermediate-range standards of 9.31 acres for parks. Furthermore, as indicated above, the standards for the PRP are Citywide goals that are not intended to be requirements imposed on individual development projects.

## (b) Los Angeles Municipal Code

As part of the proposed Project, a Specific Plan is proposed that will provide open space requirements in lieu of those set forth in LAMC 12,21. As part of these requirements, the proposed Project would provide a minimum of 100 square feet of open space area (consisting of common or private open space areas) for each housing unit. As previously discussed, Section 17.12 of the LAMC, enacted pursuant to the Quimby Act, sets forth a formula for new residential development to satisfy park and recreational demand through parkland dedication and/or the payment of in-lieu fees (as subject to determination by the DRP). Similarly, Section 12.33 of the LAMC prohibits the rezoning of a property for a multiple residential use unless the parkland dedication and/or payment of in-lieu fee requirements of Section 17.12 are met. The Project's 250 faculty housing units would be subject to the park and recreation site acquisition and development provisions of Section 17.12 of the LAMC, which may be satisfied through the dedication of land within a subdivision, the provision of on-site recreational facilities, through the payment of a fee, or through a combination of these. The proposed Project's student housing uses (5400 student beds) are considered University institutional uses that would continue to be provided with sufficient open space and recreational facilities and thus, would not be subject to the requirements of Sections 17.12 or 12.33 of the LAMC.

As described in Subsection 3.c, Project Design Features, the proposed Project would provide new open space and landscape areas that would integrate new buildings and enhance the existing character of the Project site and surrounding area. Subarea 3 would include various landscaped pedestrian pathways as well as open space areas that would total approximately 429,800 square feet ( 9.87 acres) of passive open space. Additionally, in Subarea 3, an approximately 141,500 square foot athletic area would be provided on the rooftop of the eastern parking garage and an approximately 20,000 square foot fitness center would be provided. However, it is not anticipated that the proposed Project would dedicate parkland to satisfy Section 17.12 requirements. Rather, any new open space areas and recreational areas are expected to be owned and maintained by the University. Thus, pursuant to the provisions of LAMC Section 17.12, the proposed Project
could instead pay in-lieu fees for any land dedication requirement shortfall and/or provide onsite improvements equivalent in value to said in-lieu fees. New open space provided as part of the proposed Project could be credited against the total parkland dedication requirement or the total in-lieu park fee requirement, as determined by the City. Thus, with compliance with LAMC Section 17.12 and the provision of on-site recreational facilities, impacts would be less than significant.

## (3) Transfers of Floor Area

The proposed Project would include flexibility to allow for transfers of floor area for academic/University uses and student housing between Subarea 1 and Subarea 3A on a per square foot basis. While transfers of floor area between Subareas would be permitted, the maximum amount of floor area would not exceed 30 percent of the Subarea total for Subarea 1 and 15 percent of the Subarea total for Subarea 3A. In addition, the maximum Project total of $5,230,000$ square feet may not be exceeded. Floor area transfers would not result in new impacts with regard to parks and recreation. Floor area transfers would not change the populations of undergraduates, graduates, and faculty that were analyzed for the proposed Project. Therefore, as populations would not be changed as a result of floor area transfers, floor area transfers would not alter the conclusions with regard to parks and recreation. Should academic/University or student residential floor area be transferred across the Subareas, the resulting impacts would be similar to those evaluated herein.
(4) Secondary Impacts due to Housing Backfill

As analyzed in Section IV.I.2, Housing, of this Draft EIR, the proposed Project's development of student and faculty housing as well as future student housing developments may assist in returning existing housing stock that had previously been converted to University housing back to the general non-University community. Specifically, the proposed Project and other new student housing projects approved or underway in the vicinity are anticipated to result in the return of approximately 896 residential units to the community, thus resulting in an indirect backfill population increase of approximately 2,821 persons. ${ }^{103}$ The backfill of units that may result from students, faculty, and staff vacating existing residential units may result in additional demand for parks and recreation facilities. However, the additional demand on parks and recreation facilities as a result of housing backfill would be incremental, and is not anticipated to require the addition of a new park or the expansion, consolidation, or relocation of an

[^10]existing park to maintain service. Therefore, indirect impacts on parks and recreation would be less than significant.

## 4. Cumulative Impacts

The geographic context for the cumulative impact analysis for parks and recreation is the City of Los Angeles. The buildout year for the proposed Project is 2030. Therefore, cumulative impacts on parks and recreation were analyzed relative to 2030 growth projected within the City. The 2030 growth projections are based on the Southern California Association of Governments' (SCAG) 2008 Regional Transportation Plan. As shown in Table IV.J-25 on page IV.J-115, per SCAG estimates, the City is estimated to have a 2030 residential population of $4,348,281$ persons in 2030. As indicated in Section IV.I.3, Population, of this Draft EIR, according to estimates prepared by the State's Department of Finance, in 2009, the population of the City is approximately $4,065,585$ residents. Thus, between 2009-2030, the City will experience a growth of approximately 282,696 residents.

As shown in Table IV.J-25, the 4,656 residents estimated to be associated with the proposed Project, in addition to the City's estimated 2009-2030 growth of 282,696 residents would result in a cumulative population increase of approximately 287,352 residents. Applying the PRP standards for the City (one acre per 1,000 residents for short-range; and two acres per 1,000 residents for long range), the estimated Citywide park space requirement for this cumulative growth would be as follows: (1) 287 acres of neighborhood parks and 287 acres of community parks to meet the PRP's short- and intermediate-range standards; and (2) 575 acres of neighborhood and 575 acres of community park to meet the PRP's long-range standards. While the proposed Project in conjunction with future development projects would cumulatively generate the need for additional parks and recreation facilities, future development projects would be required to comply with the parks and recreation requirements of the Quimby Act and LAMC. In particular, pursuant to LAMC Section 12.33, any rezoning of properties for multiple residential uses would be subject to the requirements of Section 17.12. In addition, there are a number of parks and recreational facilities proposed by the DRP, which would increase the future supply of neighborhood parks and community parks. Therefore, potential cumulative impacts on parks and recreation would be less than significant.

In addition, of the 30 related projects identified within the Project area, 17 are located in the service area of the DRP and include the development of residential uses. As shown in Table IV.J-26 on page IV.J-116, the 17 identified related projects would generate approximately 9,411 residents, which could increase the demand for park and recreational services as provided by the DRP. As indicated in Section III, Environmental

Table IV.J-25
Cumulative Residential Growth in the City

| City of LA 2009 Population | $4,065,585$ residents |  |  |  |
| :--- | ---: | :---: | :---: | :---: |
| City of LA 2030 Population | $4,348,281$ residents |  |  |  |
|  | $\mathbf{2 8 2 , 6 9 6}$ residents |  |  |  |
| Project's Faculty Residents Growth 2009-2030 | 418 residents |  |  |  |
| Project's Net New Undergraduate Beds | 998 residents |  |  |  |
| Project's Graduate Beds $\quad$ Project Total Residential Population | $\mathbf{3 , 2 4 0}$ residents |  |  |  |
| residents |  |  |  |  |
| Total Cumulative Growth (City Growth + Project Residential Population) | $\mathbf{2 8 7 , 3 5 2}$ residents |  |  |  |
| Park Space Needed to Meet Short Range Standard of 1 acres/1000 | $\mathbf{2 8 7} \quad$ acres |  |  |  |
| Park Space Needed to Meet Long Range Standard of 2 acres/1001 | 575 |  |  |  |

Source: Matrix Environmental, 2010.

Setting, of this Draft EIR, the growth associated with all 30 identified related projects (all of which are located in the City of Los Angeles) are within SCAG growth forecasts. Therefore, growth associated with related projects has been incorporated into the SCAG forecasts for the cumulative analysis. Furthermore, as with the proposed Project, these residential related projects and all other future residential development projects through 2030 would be subject to discretionary review by the City, would be required to implement mitigation measures to ensure that no significant impacts to park and recreational services would occur, and would be required to comply with the parks and recreation requirements of the Quimby Act and the LAMC. In addition, pursuant to LAMC Section 12.33, any rezoning of properties for multiple residential uses would be subject to the requirements of Section 17.12. Therefore, cumulative impacts on parks and recreational services would be less than significant.

## 5. Mitigation Measures

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

## 6. Level of Significance After Mitigation

As indicated above, with compliance with regulatory requirements and the provision of new on-site recreational amenities, Project-level impacts on parks and recreation would be less than significant. In addition, cumulative impacts on parks and recreation would also be less than significant. Thus, no mitigation measures would be required.

Table IV.J-26
Related Residential Projects Within General Service Area of Parks and Recreation Facilities Serving the Project Site

| Related Project No. | Related Project | Estimated Total Population |
| :---: | :---: | :---: |
| 3 | $43520{ }^{\text {th }}$ Street Apartments | 299 |
| 5 | USC Parkside II Residential Tower | 467 |
| 8 | University Gateway Mixed-Use |  |
|  | Apartment | 880 |
|  | Restaurant | 0 |
|  | Health Club | 0 |
|  | Shopping Center | 0 |
| 9 | 902 Washington Boulevard | 299 |
| 11 | 1360 \& 1500 Figueroa Street | 1,163 |
| 12 | Flower/23 ${ }^{\text {rd }}$ Mixed Use |  |
|  | Apartment | 3,135 |
|  | Shopping Center | 0 |
| 13 | 1011 Adams Boulevard |  |
|  | Apartment | 167 |
|  | Shopping Center | 0 |
| 14 | 2819 Griffith Avenue | 957 |
| 16 | 233 Washington Boulevard |  |
|  | Apartment | 192 |
|  | Shopping Center | 0 |
|  | Office | 0 |
| 17 | 2455 Figueroa Street | 303 |
| 18 | 1340 Olive Street | 281 |
| 22 | 1340 Figueroa Street |  |
|  | Condominiums | 511 |
|  | Health/Fitness Club | 0 |
|  | Restaurant | 0 |
| 23 | 2700 Figueroa Street |  |
|  | Apartment | 357 |
|  | Shopping Center | 0 |
| 24 | 3001 Western Avenue | 123 |
| 25 | Chevron/Icon Plaza - Figueroa Street \& Exposition Boulevard |  |
|  | Shopping Center | 0 |
|  | Apartments | 117 |
| 29 | 505-511 W. 31 ${ }^{\text {st }}$ Street | 75 |
| 30 | 3025 S. Figueroa Street | 85 |
|  | Total | 9,411 |

Source: Matrix Environmental, based on residential population calculations provided by HR\&A Advisors, 2010.


[^0]:    ${ }^{89}$ University of Southern California Facilities Management Services, Operations and Maintenance Services Athletic Fields, accessed online at: http://www.usc.edu/fms/dept maintenance buildings athletic.shtml, accessed June 22, 2009.
    ${ }^{90}$ University of Southern California Facilities Management Services, Operations and Maintenance Services Landscape, Irrigation and Heavy Equipment, accessed online at: http://www.usc.edu/fms/ dept maintenance buildings landscape.shtml, accessed June 22, 2009.

[^1]:    ${ }^{91}$ USC Recreational Sports, http://sait.usc.edu/recsports/site content/memberships/opening.html; accessed January 26, 2010.

[^2]:    90 DA Citywide Community Needs Assessment, accessed online at: http://losangeles.prosconsulting.com/index.html, accessed March 10, 2010.
    ${ }^{91}$ LA DRP, Final Report of the Citywide Community Needs Assessment, accessed online at: http://www.laparks.org/assessment blog.htm, accessed March 10, 2010.

[^3]:    ${ }^{92}$ City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan. Approved October 9, 1980.

[^4]:    93 Both the South Los Angeles and Southeast Los Angeles Community Plans are currently being updated by the City.

[^5]:    94 The Project's open space areas, including the proposed athletic area on the rooftop of the eastern parking garage in Subarea 3, is not counted as new floor area proposed.

[^6]:    ${ }^{95}$ Recreational rooms of at least 600 feet may qualify for up to 25 percent of the total open space requirements.

[^7]:    ${ }^{96}$ Based on the household size of 1.67 persons/unit for the faculty units.
    ${ }^{97}$ As indicated in Table IV.I-15 in Section IV.I.2, Housing, of this Draft EIR, the Project would remove 1,162 existing undergraduate beds and develop 2,160 new beds. Therefore, the net new number of undergraduate beds would be approximately 998.

[^8]:    ${ }^{98}$ Total potential residential population from the proposed Project $=418$ residents from faculty units $+3,240$ graduate beds +998 net new undergraduate beds $=4,656$ residents.
    99 USC Recreational Sports, http://sait.usc.edu/recsports/site content/memberships/opening.html; accessed January 26, 2010.

[^9]:    ${ }^{100}$ Based on the household size of 1.67 persons/unit for the faculty units.
    ${ }^{101}$ As indicated in Table IV.I-15 in Section IV.I.2, Housing, of this Draft EIR, the proposed Project would remove 1,162 existing undergraduate beds and develop 2,160 new undergraduate beds. Therefore, the net new number of undergraduate beds would be approximately 998.
    ${ }^{102}$ Total potential residential population from the proposed Project $=418$ residents from faculty units $+3,240$ graduate beds +998 net new undergraduate beds $=4,656$ residents.

[^10]:    ${ }^{103}$ Based on the average household size of 3.148 person/unit for renter occupied units in the study area as indicated in Table IV-7 of the USC Development Plan Draft EIR - Employment Housing and Population Impacts Technical Report prepared by HR\&A Advisors, Inc. (see Appendix J of this Draft EIR).

