INTRODUCTION

This section describes the potential impacts of the Project on parks and recreation services in the Project area. This section utilizes information from the following resources: the City of Los Angeles Department of Recreation and Parks (“LADRP”) website and written correspondence with Darry Ford, Senior Management Analyst, LADRP (Appendix 4.12-1 to the Draft EIR).

All three Project Sites are all owned by the County, however, they are all located within the jurisdictional boundary of the City of Los Angeles. Site 1 would be developed for County use, and thus, is not subject to the City of Los Angeles’ land use regulations. Development on Site 2 would include mixed residential and commercial uses under a ground lease, and would be subject to City of Los Angeles zoning and building regulations. Development on Site 3 would consist of an affordable housing project, comprised of senior affordable housing units, and a community recreation center, to be operated under a ground lease. As a public benefit project located on County land (and operated by a non-profit service providers), the proposed Site 3 development would be exempt from City of Los Angeles zoning and building regulations. However, as all three Sites are located within the jurisdictional boundary of the City of Los Angeles, they would utilize LADRP parks and facilities. Accordingly, impacts related to recreational facilities are addressed using City criteria.

ENVIRONMENTAL SETTING

LADRP manages all municipally owned and operated recreation and park facilities within the City, which includes over 16,000 acres of parkland between 444 neighborhood and regional parks, 13 lakes, 184 recreation centers, 13 municipal golf courses, nine dog parks, 62 swimming pools, 26 skate parks, more than a dozen museums and historic sites, tennis courts, child care facilities, senior centers, two beaches, and an urban forest.¹ The Wilshire Community Plan area provides approximately 0.23 acres of open space and recreation per 1,000 people.² The following LADRP facilities are classified as neighborhood parks and are located within a two-mile radius of the Project Sites:³

- Alvarado Terrace Park, located at 1342 South Alvarado Terrace;
- Harold A. Henry Park, located at 2909 Francis Avenue;
- Hope and Peace Park, located at 843 S. Bonnie Brae Street;
- Madison West Park, located at 464 N. Madison Avenue;
- Patton Street Pocket Park, located at 317-327 Patton Street;
- Pico Union Park, located at 1827 S. Hoover Street;
- Robert L. Burns Park, located at 4900 Beverly Boulevard;
- Rockwood Community Park, located at 1571 Rockwood Street;
- Unidad Park, located at 1644-48 Beverly Boulevard; and

¹ Los Angeles Department of Recreation and Parks website, Who We Are, website: http://www.laparks.org/department/who-we-are, accessed: March 2017.
² Letter correspondence with Darry Ford, Senior Management Analyst I, LADRP, March 8, 2017 (see Appendix 4.12-1 to the Draft EIR).
³ Ibid.
• Wilton Place Park, located at 1015 S. Wilton Place.

The following LADRP facilities are classified as community parks and are located within a five-mile radius of the Project Sites:

- Aliso-Pico Recreation Center, located at 370 S. Clarence Street;
- Alpine Recreation Center, located at 817 Yale Street;
- Baldwin Hills Recreation Center, located at 5401 Highlight Place;
- Bellevue Recreation Center, located at 826 Lucille Avenue;
- Boyle Heights Sports Center, located at 933 S. Mott Street;
- Central Recreation Center, located at 1357 E. 22nd Street;
- Chevy Chase Park, located at 4165 Chevy Chase Drive;
- Cypress Recreation Center, located at 2630 Pepper Avenue;
- Denker Recreation Center, located at 1550 W. 35th Place;
- Downey Recreation Center and Pool, located at 1775 N. Spring Street;
- Echo Park, Boys & Girls Club, and Pool, located at 751 Echo Park Boulevard;
- Eleanor Green Roberts Aquatic Center, located at 4526 W. Pico Boulevard;
- Elysian Valley Recreation Center, located at 1811 Ripple Street;
- EXPO Center, located at 3980 S. Menlo Avenue;
- Fairfax Senior Citizens Center, located at 7929 Melrose Avenue;
- Gilbert W. Lindsay Community Center, located at 429 E. 42nd Street;
- Glassell Park, located at 3650 Verdugo Road;
- Hollenbeck Park, located at 415 S. St. Louis Street;
- Hollywood Recreation Center, located at 1122 Cole Avenue;
- Hoover Recreation Center, located at 1010 W. 25th Street;
- Jim Gilliam Recreation Center, located at 4000 S. La Brea Avenue;
- Juntos Park, located at 3135 Drew Street;
- Lafayette Park, located at 2830 W. 6th Street;
- Lake Street Park, located at 227 N. Lake Street;
- Las Palmas Senior Citizen Center, located at 1820 N. Las Palmas Avenue;
- Lemon Grove Recreation Center, located at 4959 Lemon Grove Avenue;
- Lincoln Heights Recreation Center, located at 2303 Workman Avenue;
- Lincoln Heights Youth Center, located at 2500 Griffin Avenue;
- Loren Miller Recreation Center, located at 2717 Halldale Avenue;
- Los Angeles Center for Enriched Studies, located at Airdome Street between Stearns Drive and Hayworth Avenue;
- MacArthur Park, located at 2230 W. 6th Street;
- Martin Luther King Jr. Park, located at 3934 S. Western Avenue;
- Migeul Contreras Learning Center Pool, located at 322 S. Lucas Avenue;
- Normandie Recreation Center, located at 1550 S. Normandie Avenue;
- North Atwater Park, located at 3900 Chevy Chase Drive;
- Pan Pacific Park, located at 7600 Beverly Boulevard;
- Parkview Photo Center, located at 2332 W. 4th Street;
- Pecan Recreation Center, located at 127 S. Pecan Street;

Ibid.
• Pershing Square, located at 525 S. Olive Street;
• Poinsettia Recreation Center, located at 7431 Willoughby Avenue;
• Queen Anne Recreation Center, located at 1240 West Boulevard;
• Rancho Cienega Sports Complex, located at 5001 Rodeo Road;
• Rio de Los Angeles State Park, located at 1900 N. San Fernando Road;
• Roosevelt High School Pool, located at 456 S. Mathews Street;
• Ross Synder Recreation Center, located at 1501 E. 41st Street;
• Seoul International Park, located at 3250 San Marino Street;
• Shatto Recreation Center, located at 3191 W. 4th Street;
• Silverlake Recreation Center and Dog Park, located at 1850 W. Silverlake Boulevard;
• South Park Recreation Center, located at 345 E. 51st Street;
• South Seas House Park, located at 2301 W. 24th Street;
• State Street Recreation Center, located at 716 N. State Street;
• Toberman Recreation Center, located at 1725 Toberman Street;
• Tommy Lasorda Field of Dreams, located at 1901 Waterloo Street;
• Trinity Recreation Center, located at 2415 Trinity Street;
• Vineyard Recreation Center, located at 2942 Vineyard Avenue;
• Vista Hermosa Soccer Field, located at 1301 W. 1st Street; and
• Yucca Community Center, located at 6671 W. Yucca Street.

The following LADRP facilities are classified as regional parks and are located within a ten-mile radius of the Project Sites:

• Armand Hammer Golf Course, located at 601 Club View Drive;
• Arroyo Seco Park, located at 5568 Via Marisol;
• Ascot Hills Park, located at 4371 Multnomah Street;
• Barnsdall Park, located at 4800 Hollywood Boulevard;
• Bronson Canyon, located at 3200 Canyon Drive;
• Cahuenga Peak Phase I and Phase II, located at 3698 W. Wonderview Road;
• Campo de Cahuenga, located at 3919 Lankershim Boulevard;
• Caplow Property, located at 20856 Mulholland Drive;
• Cheviot Hills Park, located at 2551 Motor Avenue;
• Coldwater Canyon Park, located at 12601 Mulholland Drive;
• Elysian Park, located at 1800 Riverside Drive;
• Ernest E. Debs Regional Park, located at 1010 Everett Street;
• Exposition Park Rose Garden, located at 7929 Melrose Avenue;
• Griffith Park, located at 4730 Crystal Springs Drive;
• Harding Golf Course, located at 4730 Crystal Springs Drive;
• Holmby Park, located at 601 Club View Drive;
• Los Feliz Golf Course, located at 3207 Los Feliz Boulevard;
• Rancho Park Golf Course, located at 10460 Pico Boulevard;
• Roosevelt Golf Course, located at 2650 N. Vermont Avenue;
• Runyon Canyon Park, located at 2000 N. Fuller Avenue;
• South L.A. Wetlands Park, located at 5413 S. Avalon Boulevard;

5 Ibid.
• Wattles Garden Park, located at 1824 N. Curson Avenue; and
• Wilson Golf Course, located at 4730 Crystal Springs Drive.

The parks serving the Project Sites include facilities such as auditoriums, aquatic recreation facilities, baseball diamonds (lighted and unlighted), outdoor fitness areas, walking paths, children’s areas, lakes, and picnic areas. The recreation centers serving the Project Sites provide facilities including auditoriums, barbeque areas, baseball diamonds (lighted and unlighted), lighted indoor/outdoor basketball courts, unlighted soccer fields, jogging paths, and community rooms.

According to LADRP, the Project is located in an area of the City that is below the City’s standard for neighborhood and community park acreage of 4 acres per 1,000 people. The Wilshire Community Plan area, which includes the Project Sites, has 0.23 acres of neighborhood and community park acreage per 1,000 people, and the facilities in this area with active recreational features are very heavily used. However, as noted, residents of this area have access to nearby large regional park facilities, including Griffith Park and Elysian Park.

Regulatory Framework

Federal

National Recreation and Parks Association

The National Recreation and Parks Association (“NRPA”) publishes standards for parks and specialized facilities. A commonly accepted minimum is three acres per 1,000 persons.

State

Quimby Act

The Quimby Act (Section 66477 of the California Government Code) was enacted in 1965 to promote the availability of parks and open space in response to the need to preserve open space and provide parks and recreation facilities to accommodate residential growth in California. The Quimby Act gives cities and counties the authority to enact ordinances to require the dedication of land and/or payment of fees for parks and recreational facilities by developers of residential subdivisions as a condition of approval of a tentative tract map. The Los Angeles County Code (“LACC”) 21.24.340 and the Los Angeles Municipal Code (“LAMC”) Section 17.12 support compliance with the Quimby Act and provide a mechanism for supporting park and recreational facilities to serve County and City residents. The Quimby Act would not be applicable to the Project because the proposed uses on Site 1 (County office), and Site 3 (senior affordable housing and community recreation center, not including a subdivision map) do not require a subdivision map and are therefore not subject to the Quimby Act, and the proposed uses on Site 2 would be subject to the City of Los Angeles Park Fees, which supersede the City’s former Quimby Act fee program, as discussed below.

6 Ibid.
Local

County of Los Angeles

County of Los Angeles General Plan

The County’s General Plan addresses parks and recreational issues that affect the County. The current General Plan was adopted on October 6, 2015. The County adopted an update to the Parks and Recreation Element (February 2014), which serves as a policy guide to address the maintenance and expansion of the County’s parks and recreation system. The purpose of the Parks and Recreation Element is to plan and provide for an integrated parks and recreation system that meets the needs of residents through establishing goals and policies that address the growing and diverse recreation needs of communities served by the County. A consistency analysis of the Project’s specific goals and policies with the County’s relevant plans, policies, and goals is provided in Section 4.9, Land Use and Planning.

City of Los Angeles

City Charter

Per City Charter Article V, Section 590, the LADRP was formed to establish, construct, maintain, operate and control all parks, recreational facilities, museums, observatories, sports centers, and land utilized for public recreation in the City of Los Angeles. The LADRP was established to promote public recreation and cooperate with other public agencies and organizations for that purpose.7

General Plan Framework Element and Open Space Element

The General Plan Framework Element (the “Framework”), Chapter 9 Infrastructure and Public Services, contains policies and objectives that address the provision of parks and open space within the City. These standards are addressed in the following three areas: (1) sufficient land area reserved for parks and recreation; (2) appropriate distribution of park and recreational facilities throughout the City; and (3) a full complement of park and recreational facility types to accommodate a wide variety of users.8

The Open Space and Conservation element of the General Plan calls for the use of open space to enhance community and neighborhood character. The policies of this element recognize that there are communities where open space and recreation resources are currently in short supply and, therefore, suggest that vacated railroad lines, drainage channels, planned transit routes, and utility rights-of-way, or pedestrian-oriented streets and small parks, where feasible, might serve as important resources for serving the open space and recreation needs of residents.9

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**Public Recreation Plan**

The City’s Public Recreation Plan notes that the long-range standards under the Framework may not be reached during the life of the plan and, therefore, include 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 combined.

**Citywide Community Needs Assessment**

In 2009, LADRP completed a report to provide an inventory of the existing park facilities, define geographic areas of need, and recommend facilities to serve specific populations. The report provided a more current assessment of existing conditions and future needs than the PRP. Based on the existing supply of park and recreational facilities, the Citywide Community Needs Assessment recommended a service level of 10.60 acres of park land per 1,000 persons Citywide, including 0.10 acre of mini parks (i.e., parks less than one acre in size), 1.50 acres of neighborhood parks, two acres of community parks, and six acres of regional and large urban parks. The Citywide Community Needs Assessment serves as the facilities plan for use by DRP to address Citywide needs, and is not directly applicable to individual development projects.

**Park Fees**

Ordinance 184,505 (Parks Dedication and Fee Update ordinance) was passed by City Council on September 7, 2016 with an effective date of January 11, 2017. The purpose of this Section is to enable the acquisition of land and the collection of fees to be used for the purpose of developing new or rehabilitating existing recreational facilities in order to create a healthy and sustainable city. Payment of fees or dedication of land by development projects are intended to address the increased demand for park facilities associated with new residential development. The ordinance requires most residential projects that create new dwelling units or joint living and work quarters to dedicate land or to pay a fee for the purpose of developing park and recreational facilities. Residential projects that propose one or more additional dwelling units will be subject to the new Park Fee unless they meet one of the exceptions listed in LAMC Section 12.33 C.3. LAMC Section 12.33 C.3(d) provides that affordable housing pursuant to LAMC Section 12.33 G shall not be required to pay a park fee.

Per LAMC Section 12.33 G, new residential dwelling units which are rented or sold to persons or household of very-low, low, or moderate income shall receive an affordable housing exemption for the park fee and land dedication requirement. In projects with a mix of market-rate and affordable housing units, only the affordable housing units are eligible to receive this exemption.

**Required Open Space**

The LAMC provides minimum standards for the amount of “open space” that residential development projects should provide on-site. Open space includes both common and private greenspace and recreational amenities that meet specific standards, and is taken into account by the City in assessing

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demand for park and recreation facilities. However, not all areas designated as open space in the LAMC would be classified as park or recreational facilities under the City’s parkland fee programs (discussed previously), under the Framework, or the LADRP.

Pursuant to LAMC Section 12.21G, 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 fewer 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 is defined as area that is designed and is intended for active or passive recreation. 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, be open to the sky, have no structures that project into the common open space area, and be readily accessible to all residents of the site 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 is required to be planted with ground cover, shrubs, or trees, and at least one 24-inch box tree is required for every four dwelling units.

ENVIRONMENTAL IMPACTS

Methodology

The environmental impacts of a project with respect to parks and recreational facilities are determined based on the ability of existing parks and recreational facilities in a project area to accommodate a project’s needs for such facilities. This is calculated based on the City’s recommended ratios for parkland to population as well as project-specific recommendations of the LADRP. Based on this evaluation, a determination is made whether a project would create substantial demands on existing parks and recreational facilities such that new or expanded parks and recreational facilities would be needed either on-site or off-site.

Thresholds of Significance

In accordance with guidance provided in Appendix G to the State CEQA Guidelines, the Project could have a significant impact if it were to:

**Threshold 4.13-1:** Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

**Threshold 4.13-2:** Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

An affirmative answer to any of these questions would represent a significant impact.

**Project Design Elements**

The Project would include governmental offices, commercial retail, multi-family residential, senior affordable housing, community recreation center, and on-site parking. The design of each of the Project Sites includes open space, and public and private recreation facilities are provided with the residential
uses on Sites 2 and 3. Site 1 design includes passive open space areas that are available for use by employees.

**Impact Analysis**

**Threshold 4.13-1:** Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

**Site 1**

Development on Site 1 would not be subject to City of Los Angeles zoning and building regulations. Proposed development on Site 1 would involve removal of the existing DPR office building, vacant office building, surface parking lots, and parking structure, and construction of a new County office building containing 471,000 square feet of office use over a 390,000-square foot parking structure and 10,000 square feet of ground floor retail. In addition, a new 380,000-square foot parking structure would be constructed on the site of the existing 7-story parking structure on Shatto Place.

In general, employees of office development are less likely to patronize parks during working hours as they are more likely to use parks and recreational facilities near their homes during non-work hours. Furthermore, the development on Site 1 would not introduce permanent residents to the Project area. Therefore, development on Site 1 would not substantially increase the use or deterioration of parks and recreational facilities in the vicinity, and impacts would be less than significant with respect to the deterioration of park or recreational facilities. City of Los Angeles Park Fees would not apply to Site 1 both because it is not subject to City zoning and building requirements and because no residential development is included in Site 1.

Site 1 would include an approximately 18,600 square foot landscaped terrace on the second floor that creates an inviting open space for employees to utilize. The Project would include an additional 9,221 square feet of open space throughout floors three through nine for employees to utilize. Table 4.13-1 shows these open space areas. Because Site 1 is not subject to City zoning and building requirements, open space requirements established by the City of Los Angeles would not apply to Site 1.

**Table 4.13-1**

<table>
<thead>
<tr>
<th>Open Space Type</th>
<th>Amount (square feet)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Open Courtyard</td>
<td>18,600 sf</td>
</tr>
<tr>
<td>Passive Open Spaces</td>
<td>9,221 sf</td>
</tr>
<tr>
<td><strong>Total Common Open Space Provided</strong></td>
<td><strong>27,821 sf</strong></td>
</tr>
</tbody>
</table>

Source: Gensler 2017.

**Site 2**

Development on Site 2 would be subject to City of Los Angeles zoning and building regulations. Proposed development on Site 2 would involve reuse and conversion of the existing 154,793 square foot, 12-story DMH building into a maximum of 172 residential units (82 studio, 46 one-bedroom, 44 two-bedroom), 4,100 square feet of ground floor retail, 1,375 square feet of ancillary space (office, common area, etc.), and an approximately 7,500 square foot roof deck amenity. In addition, the development of Site 2 would involve removal of the existing four-story, approximately 52,000 square foot, WDACS office building and two-story parking structure, and construction of a new 116,324 square foot, five-level parking structure.
(3.5 levels above grade and 1.5 levels below grade). A future option for the development of Site 2 would include construction of a new 66,935 square foot, mixed-use building above the parking structure, containing five residential levels and 74 units (28 studio, 38 one-bedroom, and 8 two-bedroom), and 2,250 square feet of ancillary space. In addition, 3,400 square feet of retail uses would be provided at the ground level of the new mixed-use building on 6th Street.

In accordance with Regulatory Requirement RR-REC-1, open space shall be provided in accordance with LAMC Section 12.21-G.2, which requires at minimum 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. Use open space is defined as area that is designed and intended for active or passive recreation. 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, be open to the sky, 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 shall be planted with ground cover, shrubs or trees and at least one, 24-inch box tree is required for every four dwelling units. Open space to be provided by the development on Site 2 is shown in Table 4.13-2.

<table>
<thead>
<tr>
<th>Open Space Type</th>
<th>Amount (square feet)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pool Amenity</td>
<td>7,000 sf</td>
</tr>
<tr>
<td>Interior Amenity Space</td>
<td>1,900 sf</td>
</tr>
<tr>
<td>Public Plaza</td>
<td>1,500 sf</td>
</tr>
<tr>
<td>Rooftop Amenity</td>
<td>7,500 sf</td>
</tr>
<tr>
<td><strong>Total Common Open Space Provided</strong></td>
<td><strong>17,900 sf</strong></td>
</tr>
<tr>
<td><strong>Total Common Open Space Required</strong></td>
<td><strong>7,600 sf</strong></td>
</tr>
</tbody>
</table>

Source: Steinberg, 2017.

The standard minimum parkland-to-resident ratio provided in the City’s Public Recreation Plan is two acres per 1,000 residents. Within the Wilshire Community Plan area, in which Site 2 is located, the average household size is 2.51 persons per household. At this average household size, Site 2 would be expected to accommodate approximately 618 new residents within the Wilshire Community Plan area. Based on the parkland-to-resident ratio, the Project would generate a need for approximately 1.24 additional acres of public parkland. The Project would include open space and recreational facilities to serve Project residents that would reduce demand for public parks. However, as noted above, Site 2 is located in an area that is underserved by neighborhood and community parks, and the Site 2 development would increase demand on these facilities. As development on Site 2 would be subject to City of Los Angeles land use regulations, to alleviate the demand on City parks and recreational facilities, the Developer on Site 2 would be required to pay Park Fees in accordance with Regulatory Requirement RR-REC-2. With the payment of Park Fees to the City, new or expanded City park development would offset demand from the proposed uses on Site 2, and impacts to parks and recreational facilities would be less than significant.

11 Kitchen and dining areas are not counted towards habitable space, LAMC Sections 12.21(G)(2) and 12.03.
12 City of Los Angeles, Department of City Planning, Wilshire Community Plan, September 19, 2001.
### Site 3

As a public benefit project located on County land (and operated by a non-profit service providers), the proposed Site 3 development would be exempt from City of Los Angeles zoning and building regulations. Proposed development on Site 3 would involve removal of the existing DPR building, and construction of a new 80,837 square foot, six-story, senior affordable housing project containing 72 units, and a 13,200-square foot community recreation center, over a three-story, 51,591 square foot underground parking structure. A landscaped courtyard, open to the sky, would be provided on the second level of the Project to serve the Project residents, and would be surrounded by the upper floor units.

The residential component of the development on Site 3 includes 72 residential units and would have amenities, including an open courtyard and community rooms. As shown in Table 4.13-3 (Project Open Space for Site 3), the Project on Site 3 would provide approximately 4,990 square feet of open space. In addition, the Project on Site 3 would include a 13,200-square foot community recreation center that would serve the Project and the surrounding community.

<table>
<thead>
<tr>
<th>Open Space Type</th>
<th>Amount (square feet)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Open Courtyard</td>
<td>3,580 sf</td>
</tr>
<tr>
<td>Interior Amenity Space</td>
<td>1,410 sf</td>
</tr>
<tr>
<td><strong>Total Common Open Space Provided</strong></td>
<td><strong>4,990 sf</strong></td>
</tr>
</tbody>
</table>

*Source: Y & M Architects, 2017.*

The Project on Site 3 would include open space to serve Project residents that would reduce demand for public parks. In addition, as noted above, the Project on Site 3 would include a community recreation center to provide additional recreational opportunities for the community. Development on Site 3 would not be responsible for paying Park fees to the City because it is not subject to City zoning and building requirements. However, even if the Project on Site 3 were not exempt by virtue of its characteristics of a public benefit project located on County land (and operated by a non-profit service providers), it would be exempt from the City’s Park Fee because it includes 100 percent affordable housing. Inclusion of open space and the community recreation center would offset any increased demand associated with the residential units that would be developed on Site 3. Therefore, impacts to parks and recreational facilities would be less than significant.

**Threshold 4.13-2:** Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

### Site 1

Proposed development on Site 1 would include the construction of a new County office building containing 471,000 square feet of office use and 10,000 square feet of ground floor retail over parking structure. As such, the development on Site 1 would not introduce permanent residents to the project area and would not increase the demand for park and recreational facilities in the vicinity. Therefore, no impact would occur with respect to the construction or expansion of recreational facilities.
Site 2

Proposed development on Site 2 would include permanent residents that would increase demand for park facilities in the Wilshire Community Plan Area. The Project would provide Park Fees to the City to develop new park facilities to meet demand throughout the Community Plan Area. The development on Site 2 does not directly include a park or public recreational facility component. Rather, LADRP would develop these facilities contingent upon the availability of land and resources to provide park facilities, and any such action on the part of LADRP would be a discretionary action that would be subject to CEQA review. Therefore, impacts of the Project on Site 2 in this regard would be less than significant.

Site 3

Proposed development on Site 3 would include permanent residents that would increase demand for park facilities in the Wilshire Community Plan Area. The development on Site 3 includes an approximately 13,000 square foot community recreation center and approximately 5,000 square feet of private open space, the environmental effects of which are addressed in this Draft EIR as part of the overall Project (development on all Project Sites). The inclusion of the community recreation center on Site 3 would not result in significant environmental effects in and of itself. Therefore, impacts of the Project on Site 3 in this regard would be less than significant.

CUMULATIVE IMPACTS

Implementation of the Project in combination with the related projects identified in Section 3.0 (Project Description and Environmental Setting) would further increase demand for park and recreational facilities. Employees generated by the commercial projects would not typically experience long periods of time during the workday to visit parks and/or recreational facilities and would not, therefore, contribute to the future demand on parks. However, the increase in residential population from the Project and related projects would increase the demand for parks and recreation facilities and further impact the shortage of park/recreational space in the Wilshire Community Plan area. As noted above, proposed development of Site 1 would not contribute to cumulative impacts on park facilities by virtue of its proposed use, and development of Site 3 would not contribute to cumulative impacts on park facilities because it would include the development of a community recreation center. Future impacts on park facilities from Site 2 development and the related projects would be offset through the collection of Park Fees on new development and/or the provision of parkland by individual development projects. In accordance with State CEQA Guidelines Section 15130(a)(3), the Project’s contribution to the cumulative impact would be rendered less than cumulatively considerable through adherence to the City’s Park Fee programs for new development. Adherence to the requirements of this program would constitute implementation or funding of the Project’s fair share of measures designed to alleviate the cumulative impact and impacts would be less than significant.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

No specific Project Design Features are relevant to parks and recreational facilities.

Regulatory Requirements

RR REC-1: Open space shall be provided on Site 2 in accordance with LAMC Section 12.21-G.2.
RR REC-2: The Developer of Site 2 shall pay Park Fees to the City of Los Angeles in accordance with the requirements of LAMC Section 12.33.

MITIGATION MEASURES

No significant impacts related to parks and recreational facilities have been identified; and no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts related to parks and recreational facilities would be less than significant.

Cumulative impacts related to parks and recreational facilities would be less than significant.