4.14 RECREATION

This section of the EIR analyzes the potential environmental effects on recreation from implementation of the proposed project. Data for this section were taken from the Glendale General Plan Recreation Element, the Community Facilities Element, the Open Space and Conservation Element, the Glendale DSP, and the Community Services and Parks List of Facilities. Full reference-list entries for all cited materials are provided in Section 4.14.5 (References).

4.14.1 Environmental Setting

Parklands and recreational facilities are important land use components in an urban environment, as they provide visual relief from the built environment and contribute to residents' and employees' quality of life by providing recreational and aesthetic value. The following section describes the existing recreational facilities within the proposed SGCP area.

Parks

Existing Parks

The City Community Services and Parks Department is responsible for 285.5 acres of developed parkland and over 5,000 acres of open space (Figure 4.14-1). The Recreation Element identifies that the southern portion of Glendale is deficient in both community and neighborhood park facilities, with the neighborhood park shortage deemed as 'extreme' (Glendale 1996). According to the Community Facilities Element, there are six types of parks within the City as indicated in Table 4.14-1 (Glendale 1975).

As shown in Table 4.14-2, the proposed SGCP area currently contains 18 parks. All of the parks within the proposed SGCP area are operated by the City.

Table 4.14-1 Park Standards

Component	*Service area*	*Size (acres)*	*Amount per 1,000 population (acres)*	*Desirable uses and site characteristics*
Regional Park	1 hour's driving time	30+	N/A	Picnicking, play area, boating, fishing, swimming, camping, trails. Contiguous to or encompassing natural resources.
Community Park	1 mile radius	10-30	5.0–6.0	Athletic fields and courts, gymnasiums, swimming pools, picnic sites, play areas. Suited for intense development; may encompass natural resources.
Neighborhood Park	0.5-mile radius	2-10	1.0–2.0	Athletic fields and courts, play areas, picnic sites, wading pools. Suited for intense development with safe pedestrian and bike access; may be developed as a school site facility.
Mini Park	Less than a 0.25-mile radius	1 or less	0.25–0.5	Play equipment areas, wading pools. Suited for high density multifamily and senior housing units.
Community Center	2-mile radius	0.5-5	N/A	Multi-purpose buildings and gymnasiums, open play areas Suited for intense development with safe pedestrian access
Special Facilities	No applicable standard	N/A	N/A	May include golf courses, historic grounds or buildings, botanical gardens, commercial plazas or squares, nature centers

Source: Glendale 2017

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FIGURE 4.14-1

SGCP Park and Recreation Facilities

Source: City of Glendale 2017

100042606 South Glendale Community Plan PEIR

Table 4.14-2 Parks within the Proposed SGCP Area

Park Name	*Address/Location*	*Type of Park*	*Approximate Acres*
Milford Mini Park	601 West Milford Avenue	Mini	0.28
Doran Gardens Mini Park	327 West Doran Street	Mini	0.38
Piedmont Park	1145 East Lexington Drive	Mini	0.53
Chess Park	227 North Brand Boulevard	Mini; Special Facility	0.08
Wilson Mini Park	1101 East Wilson Avenue	Mini	0.32
Harvard Mini Park	425 West Harvard Street	Mini	0.29
Glendale Heritage Garden	141 South Cedar Street	Mini; Special Facility	0.54
Carr Park	1615 East Colorado Street	Neighborhood	3.14
Windsor Mini Park	1300 East Windsor Road	Mini	0.34
Palmer Park	610 East Palmer Avenue	Neighborhood	3.32
Elk Mini Park	800 East Elk Avenue	Mini	0.31
Adams Square Mini Park	1020 East Palmer Avenue	Mini	0.29
Cerritos Park	3690 San Fernando Road	Neighborhood	0.89
Maryland Avenue Park	812 South Maryland Avenue	Mini	0.48
Adult Recreation Center & Central Park	201 East Colorado	Neighborhood; Community Center	2.97
Central Park Paseo	220 South Brand Boulevard	Mini	0.14
Maple Park and Community Center	820 East Maple Street	Neighborhood; Community Center	3.59
Pacific Park and Community Center	501 South Pacific Avenue	Neighborhood; Community Center	5.30
		Total	**23.19**

Source: Glendale 2016

Urban Hikeway

There are several urban hikeways that provide citizens and visitors an opportunity to explore Glendale's urban landscape. Within the Glendale General Plan Open Space and Conservation Element, three self-guided routes have been established, including the Financial/Fremont Park Route, Brand Shopping Route, and the historic Civic Center Route. These routes vary in length between two and three miles and are intended to provide connectivity between activity centers located in the Downtown area (Glendale 2005).

Joint Use Recreation Facilities

The City has a master joint use agreement with the Glendale Unified School District (GUSD) to utilize 3.4 acres of recreational space at Pacific Edison Elementary.

4.14.2 Regulatory Framework

Federal

National Trails System Act of 1968

The National Trails System Act authorized a national system of trails and established the Appalachian and Pacific Crest National Scenic Trails. The Act defined four categories of national trails, with the aim of providing additional outdoor recreation opportunities and promoting the preservation of access to the outdoor areas and historic resources of the nation:

- National Scenic Trails provide outdoor recreation and the conservation and enjoyment of significant scenic, historic, natural, or cultural qualities;
- National Historic Trails follow travel routes of national historic significance;
- National Recreation Trails are in, or reasonably accessible to, urban areas on federal, state, or private lands; and
- Connecting or Side Trails provide access to or among the other classes of trails.

At the state level, the California Department of Parks and Recreation has prepared the California Recreational Trails Plan.

National Recreation and Park Association Standards

The National Recreation and Park Association (NRPA) developed area standards to assess demand for park land in cities. The NRPA standards first published in 1983 recommended a range of 6 to 10.5 acres of developed park land per every 1,000 residents. To allow for an equitable distribution of park resources, the minimum recommended standard for an urban area is 6 acres per 1,000 residents. In addition to these standards, the NRPA established a classification system for the type of park (i.e. neighborhood or community) and a recommended service radius for these facilities.

Glendale refines the NRPA standard of 6 acres per 1,000 residents by dividing this acreage into neighborhood parks and community parks. A neighborhood park is generally anywhere from 2 to 10 acres in size, serves a population within a one-half mile radius, and should be centrally located within the neighborhood it serves. Neighborhood parks should be developed at a minimum of 1 acre per every 1,000 residents. Community parks are generally 10 to 30 acres in size and tend to be utilized on a city-wide basis. The minimum population service standard for community parks is 5 acres of park land per 1,000 residents. The greatest difference between neighborhood parks and community parks is that neighborhood parks are designed to serve a pedestrian population, while a community park attracts users from all over the City (Glendale 1996).

State

Quimby Act

Government Code Section 66477, known as the Quimby Act, was established by the California Legislature in 1965 to provide parks for the growing communities in California. The Act authorizes cities to adopt ordinances addressing parkland and/or fees for residential subdivisions for the purpose of providing and preserving open space and recreational facilities and improvements. The Act requires that

cities cannot set a standard higher than 3 acres of park area per 1,000 persons unless the amount of existing neighborhood and community park area meets or exceeds that limit, in which case the City may adopt a higher standard not to exceed 5 acres per 1,000 residents. The Quimby Act also specifies acceptable uses and expenditures of such fund.

Mitigation Fee Act

California Government Code Sections 66000 through 66008, the Mitigation Fee Act, allows a city the authority to impose a fee, other than a tax, that is charged to the applicant in connection with approval of a development project for the purpose of offsetting all or a portion of the cost of public facilities related to a development project, such as wear and tear of public recreational facilities.

California State Government Code 831.4

This California State Government Code 831.4 was amended to limit landowners' liability for persons trespassing on his/her property for recreational purposes including riding and hiking.

California State Government Code 846

This California State Government Code 846 establishes that an owner of any estate or any other interest in real property owes no duty of care to keep the premises safe for entry or use by others for any recreational purpose or to give any warning of hazardous conditions on their premises to persons entering for such purpose, except as provided under specific circumstances as provided by the code.

California Conservation Easement Act of 1979

The Conservation Easement Act enables a city, county, district or nonprofit organization to acquire perpetual easements for the conservation of agricultural land and open space, or for historic preservation. Unlike open space easements, there is no procedure for non-renewal of conservation easements and there is no expiration date. In establishing an easement, a landowner and local agency agree upon the permitted land uses within the conservation area. The easement is binding upon successive owners of the land.

The Little-Used Open Space Maintenance Act

The Little-Used Open Space Maintenance Act (Government Code Section 50575 et seq) is helpful when a city or county has already acquired open space, but does not have a way to pay for its maintenance. Under this Act, local governments may levy special assessments, based on the value of the land, to improve and maintain open space; reduce fire, flood, and erosion hazards; and perform related activities.

Landscaping and Lighting Act

The Landscaping and Lighting Act (Streets and Highways Code Section 22500) enables cities, counties, and special districts to acquire land for parks, recreation, and open space. A local government may also use the assessments to pay for improvements and maintenance to these areas. In addition to local government agencies (i.e., counties and cities), park and recreation facilities may be provided by other public agencies, such as community service districts, park and recreation districts, water districts, etc. If so empowered, such an agency may acquire, develop, and operate recreation facilities for the general public.

Open Space Easement Act of 1974

Cities and counties may acquire open space easements pursuant to the Open Space Easement Act. Land must remain within an easement in perpetuity or, alternatively, for at least 10 years. An easement's term is automatically extended each year by an additional 12 months. Under certain circumstances, open space easements may be abandoned. Privately dedicated open space easements for mitigation purposes are dedicated in perpetuity and cannot be abandoned.

Senate Bill 1685

Senate Bill 1685 authorizes open space districts to levy special assessments for open space purposes. The enabling legislation for regional open space districts is in the PRC commencing with Section 5500 and in the Government Code commencing with Section 56000. Pursuant to these Codes, regional park and open space districts are formed when three or more jurisdictions, together with any parcel of city or county territory, organize a contiguous area with the intent for the designated space to serve the park and recreational needs of the region. Senate Bill 1685 is the same authority as that for regional park districts and open space districts.

State Public Park Preservation Act

The primary instrument for protecting and preserving parkland is the state Public Park Preservation Act. Under the PRC, cities and counties may not acquire any real property that is in use as a public park for any non-park use unless compensation or land, or both, are provided to replace the parkland acquired. This provides no net loss of parkland and facilities

California Department of Parks and Recreation

The California Department of Parks and Recreation manages more than 280 park units throughout California. These include state parks, state natural reserves, state historic parks, state historic monuments, state beaches, state recreation areas, state vehicular recreation areas, state seashores, and state marine parks, which are collectively known as the State Park System. The State Park System includes over 340 miles of coastline, 970 miles of lake and river frontage, 15,000 campsites, and 4,500 miles of trails. The Verdugo Mountains Park property is the closest State Park to Glendale and serves to preserve and protect, as urban open space, a remnant of natural lands near to the city.

Regional

There are no existing regional regulations pertaining to recreation that are applicable to the proposed project.

Local

Glendale General Plan

Community Facilities Element

The Community Facilities Element included policies relating to enhancing the acreage devoted to parkland, including recommending the acquisition of more than one hundred acres of parkland to meet future recreational needs. It was also recommended that the additional acreage comprise 29 new mini parks, 23 neighborhood parks, and one community park. The Community Facilities Element implemented some of the recommendations as set out in the 1990 Open Space, Recreation and

Conservation Elements for the provision of regional, community, neighborhood and mini parks. Furthermore, the Community Facilities Element included a policy on providing a wider diversity of commercial-recreation facilities to meet social and economic characteristics of Glendale's citizens. Moreover, removing temporary bungalows at public school facilities to create more recreation space and enhancing existing weekend and summer recreation programs co-sponsored by the GUSD and the City Parks and Recreation Division (now the Parks and Community Services Department) at school sites was recommended.

Open Space and Conservation Element

In March of 1972, the City adopted the 1990 Open Space, Recreation and Conservation Elements of the Glendale General Plan. The primary objective of the Open Space and Conservation Element is to develop a comprehensive plan for the identification and management of natural resources within the City. The objective is to identify, protect and maintain natural resources and to prevent their exploitation and destruction. There is some crossover with the Recreation Element, as the original 1972 version of the Open Space and Conservation Element included discussion of park and recreation needs, but this was separated into its own element and adopted in 1996. To further demonstrate the overlap, Policy 2 of the Open Space and Conservation Element states "The City shall provide a variety of outdoor recreational opportunities to all residents." The introduction of the Urban Hikeway as set out in Section 4.14.1 also indicates the overlap.

Recreation Element

The Recreation Element was created to develop a comprehensive plan for the identification of park and recreation needs, manage existing recreational resources, and develop additional facilities. Within the Recreation Element, specific goals and objectives further identified and prioritized provision of recreational opportunities and programs for Glendale residents. The Recreation Element also recognized six classifications of park facilities, namely regional parks, community parks, neighborhood parks, mini parks, community centers, and special facilities as per the NRPA standards.

Downtown Specific Plan

Building on the strategy set out in the GDSP, the DSP aims to implement the policies recommended by the GDSP, including those relating to increasing the amount of open space and developed parkland in the Downtown area. The DSP has also been subject to periodic updates between 2009 and 2016, ensuring consistency between the document and the Zoning Code.

Development Impact Fee

Development impact fees are imposed on new development as a condition of the issuance of a building permit or subdivision tract map for a development project. If a project is approved, the development impact fee for public use facilities, including libraries, parkland, and park facilities will be imposed on that project as a condition of approval. Municipal Ordinance No. 5575, Public Use Facilities Development Impact Fee Ordinance, of the Glendale Municipal Code Chapter 4.10 was first adopted in September 2007; in 2014, the City adopted Ordinance No. 5820 and Resolution No. 14-10, increasing the development impact fees for parks and libraries to the full Consumer Price Index adjusted amount of $18,751 per multi-unit residential unit and $6.50 per commercial square foot.

Glendale Public Facilities Fee Study

The City commissioned a report to analyze the need for public facilities and capital improvements to support future development in Glendale through 2030. The study's primary aim was to support the City

objective of ensuring that new development pays the capital costs associated with growth. This is achieved through the imposition of a development impact fee, as discussed above.

Greener Glendale Plan

The Greener Glendale Plan sets the City's environmental policy direction, including conservation efforts within City government and ways to help improve community livability and conservation. Policy UN4 seeks to ensure Glendale residents have accessible park and recreational open space. Specifically, Policy UN4-A seeks to identify areas not within 1/3 mile of recreational open space in order to develop strategies to provide parks or recreational open space in those areas.

Space 134 Vision Plan

The City has worked with the community to create plans for a new "cap park,"[1] which includes a 25-acre linear park constructed on a deck above the SR-134 freeway between Central Avenue and Glendale Avenue. The 2013 Vision Plan and 2016 Update seeks to re-establish a connection between the residential neighborhoods north of the freeway and the Downtown core, being comprised of two parts, the Heart (Downtown Park) and the Soul (Neighborhood Park). The Vision Plan sets out the proposed timeframe for construction phases and vision for the park's conceptual layout.

4.14.3 Project Impacts and Mitigation

Analytic Method

A review of the California Department of Parks and Recreation website and the Glendale General Plan Community Facilities, Open Space and Conservation, and Recreation Elements was undertaken to determine recreation resources, such as State, local, and regional parks.

For purposes of this analysis, increased use of existing parks is determined based on the ability of the proposed project to provide parkland at a ratio of 6 acres per 1,000 new residents, or appropriate payment of Quimby fees. This analysis focuses on whether the increase in population associated with future development under the proposed SGCP would result in the increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated.

Thresholds of Significance

The following thresholds of significance are based on the 2017 State CEQA Guidelines Appendix G. For purposes of this EIR, implementation of the proposed project may have a significant adverse impact on recreation if it would do any of the following:

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
- Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

[1] A cap park is a public open space built over existing below-grade segments of a freeway.

Significant and Unavoidable Impacts

Threshold	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?

Impact 4.14-1 Implementation of the proposed project would 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. This is considered a potentially significant impact. Because no feasible mitigation is available to reduce this impact to a less than significant level, this would remain *significant and unavoidable*.

Implementation of the proposed SGCP would permit the development or redevelopment of allowable land uses and would result in an increase of up to 10,337 dwelling units. As discussed in Section 4.12 (Population and Housing), implementation of the proposed SCGP would potentially result in a population increase of 27,910 people, which would bring the total population within the proposed SGCP area to 130,248 people. Applying the minimum NRPA standards of 6 acres per 1,000 residents to the City would require a total of approximately 781 acres of developed parkland. Presently, there is approximately 285 acres of developed parkland within the City, indicating a deficit of 496 acres. As indicated in Table 4.14-2, the proposed SGCP area has 23.19 acres of park land.

The increase in population would result in an increase in the use of local and regional recreational facilities within the proposed SGCP area. The Glendale General Plan Recreation Element has established a standard ratio of 6 acres per 1,000 persons. The proposed SGCP area currently has a ratio of approximately 0.23 acre of parkland per 1,000 persons[2]. Implementation of the proposed SGCP would result in a population increase of 27,910, which would create the need for an additional 167.5 acres of new parkland.[3] Implementation of the proposed SGCP would further exacerbate the deficiency of parkland, which would lead to a deterioration of existing facilities.

The City is currently studying Space 134, a 25-acre linear "cap park" located above the SR-134 freeway (Glendale 2016). The 25-acre increase would bring the total parkland to 48.19 acres of parkland available to residents within the proposed SGCP area. The parkland ratio would increase to 0.47 acre of parkland per 1,000 persons, a 104 percent increase to the existing 0.23 acre per 1,000 persons.

When completed, the Glendale Narrows Riverwalk would provide a total of approximately 2.6 acres of "trails for bicyclists and pedestrians that will include parks, rest areas, river overlooks, an equestrian facility, interpretive signage, a public art project, and potentially a bridge connecting Glendale Narrows Riverwalk to Griffith Park and/or North Atwater" (Glendale 2014a). Phase I (approximately 2 acres) is complete, while Phase II, currently in planning, should provide an additional approximately 0.6 acres of new recreation space; Phase III, the Los Angeles River bridge, will provide additional connectivity when completed. The total acreage of this project is not considered in parkland calculations given its conceptual status and location outside of the proposed SGCP area.

Future development within the proposed SGCP area would be required to comply with the minimum NRPA and Quimby Act standards. Specifically, this requires that 6 acres of land for each 1,000 residents

[2] Calculated as (23.19 acres/population of 102,338) x 1,000
[3] Calculated as: (27,910 persons/1,000 persons) x 6 acres

be devoted to local park and recreational purposes. This could be met through land dedication or payment of park fees, or a combination of both. While dedicated parkland directly increases the available recreation space within the City for residents, the payment of park fees from new development would be allocated to fund the acquisition and/or development of future parks or facility renovations associated with increased use of public facilities.

Adherence to existing applicable local regulations and implementation of the provisions in the Quimby Act would ensure that parks and open space are acquired, developed, improved, and expanded as future residential projects are constructed. The proposed SGCP is not a physical project and does not directly create an impact; however, development resulting from the proposed SGCP would be subject to development impact fees in order to mitigate any potential impacts associated with parklands. As mentioned above in Section 4.14.2 Regulatory Framework, development impact fees would be imposed on any future development project, and these payments would constitute mitigation of project-related impacts on park and recreation land and facilities within the proposed SGCP area. Furthermore, Space 134 would help alleviate the strain on the existing facilities by adding a facility that would raise the acreage per 1,000 persons. Any open space, facilities or parks proposed for establishment at a later date would require separate environmental review under CEQA and development impact fees; however, the proposed SGCP will remain deficient in parkland despite the increases in parkland acreages.

Although implementation of the proposed SGCP would result in a reduced deficiency in parkland available to the residents of South Glendale, the area would remain in noncompliance with the 6 acres of parkland per 1,000 residents. No mitigation measures are feasible to reduce this impact; therefore, this is considered a significant and unavoidable impact.

Threshold	Would the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

Impact 4.14-2 Implementation of the proposed project would include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. This is considered a potentially significant impact. Because no feasible mitigation is available to reduce this impact to a less than significant level, this would remain *significant and unavoidable*.

Future population increases would result in additional demand for park and recreational areas, and possibly create the need for the construction or expansion of such areas. As part of the proposed SGCP, the creation of Space 134 is envisioned, which would introduce park space and reconnect the neighborhoods north of the freeway with Downtown Glendale.

The existing Glendale General Plan strives to alleviate park and recreational deficits through implementation of goals, objectives, and policies as identified in the Open Space and Conservation Element, Community Facilities Element, and Recreation Element, as well as in the DSP. The proposed SGCP includes citywide Principal 3.8.1 to provide and enhance a variety of high-quality parks, trails, community centers, and open space, regionally integrated, equitably distributed and accessible to all, to contribute to the character of the community and offer personal enrichment, educational, and recreational opportunities. In addition, citywide Principal 3.10.1 is provided to limit new development in natural areas by protecting indigenous trees and habitats and perennial streams with habitat value (blueline streams). The City is planning for the development of a new recreation use along SR-134 that

would comprise of 25 acres of recreational uses (i.e., Space 134). It is possible that new development of park and recreational areas may be planned in the future to meet City standards, and the construction and/or operational of such recreational facilities would have an adverse effect on aesthetics, air quality, biological resources, cultural resources, noise, and traffic. Therefore, the proposed project could result in potentially significant and unavoidable direct impacts from the construction or expansion of recreational facilities. No mitigation measures are feasible to reduce this impact; therefore, this is considered a significant and unavoidable impact.

Mitigation Measures

There are no feasible mitigation measures that would reduce the impacts associated with Impacts 4.14-1 and 4.14-2.

Level of Significance After Mitigation

The proposed SGCP would result in significant and unavoidable impacts associated with existing neighborhood and regional parks or other recreational facilities and the construction or expansion of recreational facilities.

4.14.4 Cumulative Impacts

Threshold	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?

The geographic context for increased use of existing neighborhood and regional parks or other recreational facilities is projects within the City and the adjacent communities. Cumulative projects in Glendale and the adjacent communities, such as the development of 180 mixed-use units at 515 West Broadway in Glendale and the 154 residential units and retail/restaurant uses on the ground floor at 103 East Verdugo Avenue in Burbank, will increase the use of existing neighborhood and regional parks or other recreational facilities. In general, cumulative projects in the region will result in a net increase in population utilizing recreational facilities within Glendale and the adjacent communities; however, these areas are currently deficient in recreational facility service standards. Projects in Glendale are required to pay development impact fees to fund any expansion of parks or other recreational facilities required to accommodate population growth associated with a project. Neighboring cities, such as Burbank and Pasadena, require similar community fees to fund any expansion of parks or other recreational facilities. Compliance with these fees would reduce impacts to neighborhood and regional parks, or other recreational facilities below a level of significance. Therefore, cumulative projects would result in a less than significant impact associated with increased use of neighborhood and regional parks, or other recreational facilities.

As discussed in Impact 4.14-1, implementation of the proposed SGCP was determined to result in significant and unavoidable impacts associated with increased use of neighborhood and regional parks, or other recreational facilities. As stated above, projects in Glendale are required to pay development impact fees to fund any expansion of parks or recreational facilities required to accommodate population growth associated with a project; however, the future payment of development fees will not reduce the existing deficiency in parkland acreage. Therefore, the proposed project in combination with cumulative projects

would result in a cumulatively considerable contribution to a potentially significant impact associated with the increased use of existing neighborhoods and regional parks, or other recreational facilities.

Threshold	Would the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

The geographic context for expansion of recreational facilities includes projects within Glendale and adjacent communities. Cumulative projects in Glendale and adjacent communities, such as the development of 28 multi-family units at 2612 Honolulu Avenue in Glendale and 216 apartments at 315 North First Street in Burbank, would increase the number of people utilizing recreational facilities within Glendale and the adjacent communities and could require the expansion of recreational facilities. However, any expansion of a recreational facility would require environmental review.

Implementation of the proposed SGCP was determined to result in significant and unavoidable impacts associated with expansion of recreational facilities. Future recreational projects implemented as a result of the proposed SGCP and cumulative projects would result in the combined need for new recreational facilities; and the construction of those facilities would have the potential to result in adverse environmental effects. Therefore, the proposed project in combination with cumulative projects would result in a cumulatively considerable contribution to a potentially significant impact associated with the construction or expansion of recreational facilities.

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