5.12 RECREATION

This section of the EIR identifies existing park and recreational facilities in the project vicinity and evaluates potential environmental impacts to nearby parks and recreational facilities that would occur with project implementation. For the purposes of the information and analysis provided in this section, it is important to note that while the project site provides existing uses that benefit the public and passive recreational opportunities including open space and parkland, it is not managed by the respective parks and/or recreation departments of either the County or the City of Los Angeles (City).

5.12.1 Existing Conditions

The project site includes 13 acres of the eastern and northwestern portions of Hancock Park and broadly encompasses what is known as La Brea Tar Pits. Among the museum-related facilities on-site, the project site also provides open space and parkland that supports passive recreational use by the public. The Central Green and open space areas within the greater Hancock Park are the only public green spaces within 1.5 miles of the project site. Existing visitation at the George C. Page Museum (Page Museum) was estimated by using attendance counts from July 2017 (see Appendix J for more detail). Based on this approach, it is estimated that a typical summer visitation is around 2,000 visitors on an average weekday and 2,600 daily visitors on Saturdays. Most people visiting the Page Museum also visit and use the surrounding parkland. Additional visitors may use the park without visiting the museum. However, there is no quantification of this existing parkland use.

Within Los Angeles County, the Los Angeles County Department of Parks and Recreation (LA County Parks) manages most parkland. As noted above, while the project site provides passive recreational opportunities and parkland, it is not managed by LA County Parks. LA County Parks manages 73,214 acres of parkland, spread over 182 parks with over 475 sports amenities. LA County Parks operates a network of 9 regional parks, 19 community regional parks, 20 community parks, 38 neighborhood parks, 15 wildlife sanctuaries, 10 nature centers, 36 public swimming pools, more than 200 miles of multi-use trails for hiking, biking, and horseback riding, and the largest municipal golf system in the nation, consisting of 20 golf courses (LA County Parks 2021).

As outlined in the Parks and Recreation Needs Assessment, the County maintains 98,977 acres of regional open space, which includes facilities that are more than 5 acres and generally contain only passive amenities such as visitor centers, trails, picnic shelters, or restrooms (LA County Parks 2016). The County maintains 15,723 acres of local parks, which are defined as under 100 acres and contain active amenities such as athletic courts and fields, playgrounds, and swimming pools. The County maintains 18, 248 acres of regional recreation parks which are defined as over 100 acres and contain active amenities such as athletic courts and fields, playgrounds, and swimming pools. The County maintains 18, 248 acres of regional recreation parks which are defined as over 100 acres and contain active amenities such as athletic courts and fields, playgrounds, and swimming pools. The County also maintains 768,699 acres of natural areas.

The City of Los Angeles Department of Recreation and Parks (City RAP) is responsible for the establishment, operation, and maintenance of all City-owned public parks and recreational facilities in the city. These recreational facilities include parks, swimming pools, public golf courses, recreation centers, museums, youth camps, tennis courts, sports programs, and programs for senior citizens. The City RAP also supervises construction of new facilities and improvements to existing ones. Currently, the City RAP maintains over 16,000 acres of parkland within 444 regional, community, and neighborhood parks; 422 playgrounds; 321 tennis courts; 184 recreational centers; 72 fitness areas; 62 swimming pools and aquatic centers; 30 senior centers; 26 skate parks; 13 golf courses; 12 museums, 9 dog parks; 187 summer youth camps; and helps support the Summer Night Lights gang reduction and community intervention program (City of Los Angeles 2022). The City RAP supports the city's urban wilderness and open spaces

by maintaining and caring for the park urban tree canopy, 13 lakes, and 92 miles of hiking trails. The City RAP oversees Griffith Park and operates Venice Beach, the Cabrillo Marine Aquarium, and 12 museums.

According to the City RAP Community Needs Assessment, city parks are classified as mini, neighborhood, community, or regional. A mini park is less than 1 acre in size and a neighborhood park ranges in size from 1 to 10 acres, with a service area of a 0.5 mile. The city contains 51 total acres of mini parks and 774 acres of neighborhood parks. A community park ranges in size from 10 to 50 acres and regional parks are generally more than 50 acres in size and serve the city and region. The city contains 2,966 acres of community parks and 32,289 acres of regional and large urban parks (City RAP 2009).

Based on these inventories, the current service level for all park land is 9.231 acres per 1,000 persons; however, this number is drastically skewed by the large number of regional/large urban park land (89.5% of all acreage falls into the regional/large urban park classification). Current service levels for all four park classifications used in the Community Needs Assessment are:

- Mini parks: 0.013 acre per 1,000 persons
- Neighborhood parks: 0.198 acre per 1,000 persons
- Community parks: 0.759 acre per 1,000 persons
- Regional and large urban parks: 8.261 acres per 1,000 persons
- Total parks: 9.231 acres per 1,000 persons

The project site is located within the Wilshire Community Plan area. The City RAP operates 20 public parks and recreational facilities in the Wilshire Community Plan area. The Wilshire Community Plan designates approximately 191 acres of park land, including about 100 acres within a private golf course (Wilshire Country Club).

5.12.1.1 Surrounding Parks and Recreational Facilities

There are several parks and recreational facilities located close to the project site. Table 5.12-1 lists the type of park, amenities, and the approximate walking distance from the project site for these public parks and recreational facilities.

Beyond the project site itself, there are no large open-space areas or parks contiguous or adjacent to the project site. The Kenneth Hahn State Recreation Area is located approximately 5 miles south of the site and Griffith Park, a City of Los Angeles park, is about 5.5 miles to the northeast.

Name	Address	Distance to Project Site (miles)	Amenities	Acreage
Wilshire Green Park	799 Courtyard Pace Los Angeles, CA 90036	0.15 mile	Benches, small gazebo	<0.5 acre
Carthay Circle Park	6313 South San Vicente Boulevard Los Angeles, CA 90048	0.80 mile	Benches	0.97 acre
Mansfield Avenue Park	698-690 S. Mansfield Avenue Los Angeles, CA 90036	0.86 mile	Tables and seats	<0.5 acre

Table 5.12-1. Parks and Recreational Facilities Surrounding the Project Site

Name	Address	Distance to Project Site (miles)	Amenities	Acreage
Pan Pacific Park	7600 Beverly Boulevard Los Angeles, CA 90036	0.94 mile	Pan Pacific Pool Barbecue pits, baseball diamond (lighted), basketball courts (lighted / indoor), children's play area, picnic tables, restroom(s), amphitheater, jogging path, kitchen, multipurpose sports field, outdoor fitness equipment, stage, basketball courts (unlighted / outdoor)	28 acres
La Cienega Park, Community Center, and Tennis Center*	8400 Gregory Way Beverly Hills, CA 90211	1.44 miles	Community Center, three baseball diamonds, playground, BBQ and picnic tables, outdoor fitness equipment, Tennis Center, and tennis courts	17 acres
Hamel Mini Park*	214 S. Hamel Drive Beverly Hills, CA 90211	1.74 miles	Children's playground, picnic tables	<0.5 acre
LA High Memorial Park	4625 W. Olympic Boulevard Los Angeles, CA 90019	1.81 miles	Children's playground	2.51 acres

Source: City of Beverly Hills (2022); City of Los Angeles (2022).

* Managed by the City of Beverly Hills. All other parks listed are managed by the City of Los Angeles.

5.12.2 Regulatory Setting

5.12.2.1 Federal

There are no federal recreation regulations applicable to the project.

5.12.2.2 State

There are no state recreation regulations applicable to the project.

5.12.2.3 County of Los Angeles

COUNTY OF LOS ANGELES 2035 GENERAL PLAN

The County's General Plan (County of Los Angeles 2015) includes Open Space Resource Areas, which refer to public and private lands and waters that are preserved in perpetuity or for long-term open space and recreational uses. Existing open space in the unincorporated areas include County parks and beaches, conservancy lands, state parklands, and federal lands. Open spaces can also include deed-restricted open space parcels and easements. Table 5.12-2 provides goals and policies within the County's General Plan that are relevant to the project and the Tar Pits site.

Goal/Policy	Goal/Policy Description	
Conservation a	nd Natural Resource Element	
Goal C/NR 1	Open space areas that meet the diverse needs of Los Angeles County	

Goal/Policy	Goal/Policy Description
Policy C/NR 1.2	Protect and conserve natural resources, natural areas, and available open spaces.
Goal C/NR 2	Effective collaboration in open space resource preservation.
Policy C/NR 2.2	Encourage the development of multi-benefit dedicated open spaces.
Policy C/NR 2.4	Collaborate with public, non-profit, and private organizations to acquire and preserve available land for open space.
Policy C/NR 2.3	Improve understanding and appreciation for natural areas through preservation programs, stewardship, and educational facilities.
Parks and Recrea	tion Element
Goal P/R 1	Enhanced active and passive park and recreation opportunities for all users.
Policy P/R 1.1	Provide opportunities for public participation in designing and planning parks and recreation programs.
Policy P/R 1.2	Provide additional active and passive recreation opportunities based on a community's setting, and recreational needs and preferences.
Policy P/R 1.5	Ensure that County parks and recreational facilities are clean, safe, inviting, usable and accessible.
Policy P/R 1.8	Enhance existing parks to offer balanced passive and active recreation opportunities through more efficient use of space and the addition of new amenities.
Policy P/R 1.11	Provide access to parks by creating pedestrian and bicycle-friendly paths and signage regarding park locations and distances.
Goal P/R 2	Enhanced multi-agency collaboration to leverage resources.
Policy P/R 2.5	Support the development of multi-benefit parks and open spaces through collaborative efforts among entities such as cities, the County, state, and federal agencies, private groups, schools, private landowners, and other organizations.
Goal P/R 5	Protection of historical and natural resources on County park properties.
Policy P/R 5.5	Preserve and develop facilities that serve as educational resources that improve community understanding of and appreciation for natural areas, including watersheds.
Policy P/R 5.6	Promote the use of County parks and recreational facilities for educational purposes, including a variety of classes and after school programs.

5.12.2.4 City of Los Angeles

While the project site is located within the city of Los Angeles, it is owned by the County of Los Angeles. Accordingly, the project is not subject to the regulatory controls of the City of Los Angeles. Nonetheless, regulatory and planning documents of the City of Los Angeles that are most relevant to the project as they relate to parks and recreational facilities are provided herein for informational purposes.

CITY OF LOS ANGELES GENERAL PLAN

Table 5.12-3 provides goals and policies within the City's General Plan that are most relevant to the project.

Goal/Policy	Goal/Policy Description
Framework Elem	ent
Policy 6.4.1	Encourage and seek to provide for usable open space and recreational facilities that are distributed throughout the city.
Policy 6.4.5	Provide public open space in a manner that is responsive to the needs and wishes of the residents of the city's neighborhoods through the involvement of local residents in the selection and design of local parks. In addition to publicly owned and operated open space, management mechanisms may take the form of locally run private/nonprofit management groups, and should allow for the private acquisition of land with a commitment for maintenance and public access.
Policy 6.4.8	Maximize the use of existing public open space resources at the neighborhood scale and seek new opportunities for private development to enhance the open space resources of the neighborhoods.
	 Encourage the improvement of open space, both on public and private property, as opportunities arise. Such places may include the dedication of "unbuildable" areas or sites that may serve as green space, or pathways and connections that may be improved to serve as neighborhood landscape and recreation amenities.
Policy 6.4.4	Consider open space as an integral ingredient of neighborhood character, especially in targeted growth areas, in order that open space resources contribute positively to the city's neighborhoods and urban centers as highly desirable places to live.

Table 5.12-3. City of Los Angeles General Plan, Relevant Policies and Objectives

CITY OF LOS ANGELES PUBLIC RECREATION PLAN

The Public Recreation Plan, a component of the City's General Plan, establishes policies and standards related to parks and recreational facilities in the city. The Public Recreation Plan was adopted in 1980 by the Los Angeles City Council and amended by City Council resolution in March 2016 (City of Los Angeles 1980, 2016). The plan also addresses the need for publicly accessible neighborhood, community, and regional recreational sites and facilities across the city. The Public Recreation Plan focuses on recreational site and facility planning in underserved neighborhoods with the fewest existing resources and the greatest number of potential users (i.e., where existing residential development generates the greatest demand), as well as areas where new subdivisions, intensification of existing residential development, or redevelopment of "blighted" residential areas creates new demand.

WILSHIRE COMMUNITY PLAN

The Wilshire Community Plan establishes specific goals, objectives, policies, and programs to meet the existing and future needs of the Wilshire community (City of Los Angeles 2001). The Wilshire Community Plan aims to enhance the positive characteristics of residential neighborhoods while providing a variety of housing opportunities; improve the function, design, and economic vitality of the commercial areas; preserve and enhance the positive characteristics of existing uses which provide the foundation for community identity, such as scale, height, bulk, setbacks, and appearance; maximize the development opportunities around the existing and future transit systems while minimizing adverse impacts; preserve and strengthen commercial developments to provide a diverse job-producing economic base; and improve the quality of the built environment through design guidelines, streetscape improvements, and other physical improvements which enhance the appearance of the community. Table 5.12-4 provides goals and policies within the Wilshire Community Plan that are most relevant to the project.

Objective/Policy	Objective/Policy Description	
Parks and Recreation		
Goal 4	Provide adequate recreation and park facilities to meet the needs of residents in the Wilshire Community Plan area.	
Objective 4-1	Conserve, maintain and better utilize existing recreation and park facilities which meet the recreational needs of the community.	
Policy 4-1.1	Preserve and improve the existing recreational facilities and park spaces.	
	 Program: Maintain all open space designations within the Wilshire Community Plan. Designate open space parkland as acquired by the Department of Recreation and Parks. 	
Open Space		
Objective 5-1	Preserve existing open space resources and where possible develop new open space.	
Policy 5-1.3	Convert and upgrade underutilized publicly owned property.	
	 Program: Improve available rights-of-way throughout the Wilshire Community Plan area with landscaping, benches, picnic sites, walkways, for low-intensity recreational uses. Encourage this improvement separately, and in combination with transit center or busway improvements, currently under study by the Metropolitan Transportation Authority. 	

Table 5.12-4. Wilshire Community Plan Objectives and Policies Relevant to the Proposed Project

CITYWIDE COMMUNITY NEEDS ASSESSMENT

In 2009, the City RAP commissioned an update of the last Recreation and Parks Needs Assessment from 1999 as a preliminary step in developing a citywide park master plan and 5-year capital improvement plan. The Citywide Community Needs Assessment provides an inventory of existing facilities, defines geographic areas of need and recommended facilities to serve specific populations, and identifies priorities for additional parks and recreation facilities. The report provides a more current assessment of conditions and future needs compared to the Public Recreation Plan, while the Public Recreation Plan recommends the ratios of park acreage per person used in the analysis. Following the Community Needs Assessment, the City RAP began the 50 Parks Initiative, which is intended to substantially increase the number of parks and facilities across the city, with a specific focus on densely populated neighborhoods and communities that lack sufficient open space and recreational facilities.

5.12.3 Thresholds of Significance

The following thresholds of significance are based on the Environmental Checklist contained in Appendix G of the State CEQA Guidelines. A project would result in significant adverse impacts related to public services (parks) and recreation if it would:

- a) 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; and/or
- b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

5.12.4 Impact Assessment Methodology

The impact assessment was based on a desktop review of the existing parks and recreational facilities in the vicinity of the project site and qualitatively evaluating the demand for increased use of these parks and recreational facilities upon project implementation. In addition, the project's proposed improvements to the passive recreational areas within the project site were evaluated for their potential to result in adverse impacts other than those addressed throughout this EIR.

5.12.5 Environmental Impact Analysis

a) 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 project site includes 13 acres of Hancock Park and supports passive recreational use by the public. In addition to the publicly accessible recreational areas and open space provided within the project site, there are also a number of existing parks and recreational facilities located close to the project site (see Table 5.12-1). The project would have a significant environmental impact if implementation of the project were to result in a significant change to the existing environment in a manner that would physically deteriorate existing neighborhood and regional parks or other recreational facilities or result in other physical effects to the environment. Typically, a project's potential to result in physical deterioration is determined by evaluating how an increase in population generated by the project would affect existing recreational facilities. However, the project site and the project does not propose to add residential uses. Rather, the project site is a cultural destination offering museum uses and open space areas for passive recreational use. As such, this analysis qualitatively considers the project's potential to impact the use of existing neighborhood and regional parks or other recreational facilities by construction workers, employees, and visitors to the project site during project construction and operation.

CONSTRUCTION

During project construction, portions of the 13-acre project site would be used to accommodate earthwork and construction activities as well as provide staging areas for equipment and materials. Access to portions of the passive recreational areas provided at the project site may be temporarily limited to the museum employees and visitors, and the public during construction, but would not be fully closed for access. As such, there is a potential for construction workers, museum employees and visitors, as well as members of the public to use parks and recreational facilities located near the project site during project construction. The nearest public park to the project site is Wilshire Green Park which is approximately 0.15 mile southeast of the project site and can be accessed at several locations along West 8th Street and Courtvard Place. This park is not located along major streets that would provide access to the project site during construction. The distance of this park from the construction activity and the intervening development would avoid potential noise or conflict with construction activities. A small number of construction workers may visit this park during or after a workday. However, construction workers are temporary employees with high turnover associated with the various phases of construction, so such park use would be intermittent and short-term in nature. Museum employees and visitors, as well as the public may also use nearby park and recreation facilities during construction, but this use would also be temporary and intermittent over the project's construction period. Therefore, construction of the project would not result in increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Construction impacts would be less than significant.

OPERATION

The project would not include residential uses that would introduce a new or permanent population that would use the site for recreation or increase the use of nearby parks or recreational facilities. As described in Chapter 3, Project Description, the project would result in an increase of approximately 20 new employees; however, this increase in employees is not expected to significantly increase recreational demand. New employment opportunities generated by the project may be filled, in part, by employees

already residing in the project vicinity who already use existing parks and recreational facilities. Given the nature of the project, it is likely that new employees would primarily remain on-site due to work obligations and the amount of time it would take for employees to access these off-site areas. While they may use nearby parks and recreational facilities within the project vicinity, it would not be in such a capacity that substantial physical deterioration of any one facility would occur or be accelerated. As stated in Section 5.13, Transportation and the Transportation Assessment (see Appendix J), the project would result in an increase in visitor trips to the project site upon project implementation. Estimated increases in visitors to the Page Museum resulting from the project have been estimated linearly related to the increase in square footage (67%). Based on these estimates, the increase in visitors on weekdays would be 1,350 people, and on Saturdays the increase would be approximately 1,750 people.¹ Additional visitors may use the park without visiting the museum. These visitors are primarily traveling to the project site to visit the museum and associated passive recreational amenities, including the open space areas, provided on-site. While visitors to the project site may use other nearby parks and recreational facilities, it would not be in such a way that would cause substantial physical deterioration as the proposed enhancements to the project site would offer the beneficial continued access to park and recreational space in an urban area where park and open space availability is somewhat limited.

Given the project would not result in a new or permanent population that would use the site for recreation or increase the use of nearby parks or recreational facilities and would continue to provide publicly accessible open space areas within the project site, implementation of the project would not result in an associated increase in the use of nearby existing parks and recreational facilities such that substantial physical deterioration of any existing recreational facilities would occur or be accelerated. Impacts would be *less than significant*.

REC Impact 1

The project would not result in substantial physical deterioration of existing parks and recreation facilities during either project construction or operation. Impacts would be less than significant.

(CEQA Checklist Appendix G Threshold XVI. a)

Mitigation Measures

No mitigation is required.

Impacts Following Mitigation

Not applicable. Impacts related to increased use of existing neighborhood and regional parks, or other recreational facilities would be less than significant.

b) 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?

As described in Chapter 3, Project Description, the project would result in modifications to existing structures and enhancements to the passive recreational areas and outdoor open spaces within the 13-acre project site. While the project would not expand or increase the amount of area dedicated to existing

¹ Existing visitation at the George C. Page Museum was estimated by using attendance counts from July 2017 (See Appendix J for more detail). Based on this approach, it is estimated that a typical summer visitation is around 2,000 visitors on an average weekday and 2,600 daily visitors on Saturdays.

passive recreational uses, it would include improvements to the existing recreational areas and outdoor open spaces through modification to the existing pedestrian pathways into a continuous paved pedestrian path linking the existing elements of the site, including the Central Green. The project would also add a children's play area, picnic areas, and other new passive recreational amenities, such as seating areas and viewing points.

CONSTRUCTION

As described above, construction of the project would include improvements to existing passive recreational areas within the project site. These improvements are considered as part of the overall project design and no other recreational facilities besides the improvements proposed by the project would be implemented. Construction activities associated with improvements to the existing recreational areas within the project site could include grading and other ground-disturbing activities, landscaping modifications, as well as the use of construction equipment throughout the construction duration of the project. The potential for adverse physical effects on the environment during project construction are evaluated throughout the environmental topic areas presented in Chapter 5, Environmental Impact Analysis, of this EIR. These construction activities would result in a temporary increase in noise and an increase in air quality construction-related emissions, and could also have impacts on or related to aesthetics, biological resources, archaeological resources, geology and soils, and hazards and hazardous materials. Construction impacts related to the enhancement of on-site passive recreational facilities could be significant.

OPERATION

Upon project implementation, operation of the project would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Operational impacts would be *less than significant*.

REC Impact 2

Construction of the project would include enhancements and modifications to existing recreational facilities within the 13-acre project site. These activities could have an adverse physical effect on the environment. Construction impacts could be significant.

Operation of the project would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Operational impacts would be less than significant.

(CEQA Checklist Appendix G Threshold XVI. b)

Mitigation Measures

Implement construction-related Mitigation Measures AES/mm-4.1, AQ/mm-3.1; BIO/mm-1.1, BIO/mm-2.1, BIO/mm-3.1, BIO/mm-5.1 and 5.2, and BIO/mm-6.1; CR-ARCH/mm-1.1 through 1.4; GEO/mm-3.1 and 3.2, GEO/mm-4.1, and GEO/mm-6.1 through 6.5; GHG/mm-1.1; HAZ/mm-1.1 and 1.2, and HAZ/mm-2.1 and 2.2; NOI/mm-1.1; TRA/mm-4.1 through 4.3; and TCR/mm-1.1 through 1.4.

Impacts Following Mitigation

Implementation of the project's construction-related mitigation measures referenced above would reduce construction impacts associated with enhancement of on-site passive recreational facilities to less than significant. Operational impacts would be less than significant.

5.12.6 Cumulative Impact Analysis

The geographic context for the cumulative impact analysis of parks and recreational facilities considers facilities within a 2-mile distance of the project site (see Table 5.12-1). These include facilities within the City's jurisdictional boundaries as well as the neighboring jurisdiction of the City of Beverly Hills. As provided in Chapter 4, Environmental Setting, a list of cumulative development projects in the vicinity of the project site also details nearby related projects, which consist of a variety of land uses, including residential, institutional, commercial, office, and mixed use. These related projects occur primarily as urban infill within the existing land use setting of the downtown Los Angeles area.

The project would not 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, as described in REC Impact 1. Further, the project site would continue to provide passive open space and recreational amenities for public use during project construction and operation in a downtown urban area where access to recreational spaces is limited. The demand and use of the existing parks and recreational facilities within the project vicinity would likely continue to increase with implementation of related development projects, many of which include residential uses which directly drive population growth and subsequently, the use of park and recreational facilities. As with the project, related projects and other future development projects would undergo discretionary review on a case-by-case basis and would be expected to coordinate with all requirements of the applicable plans, governing regulations, and municipal codes. The County, the City, and the neighboring jurisdictions all require payment of impact fees by development projects in accordance with each jurisdiction's applicable municipal ordinances to reduce impacts on local recreational and park resources due to the increased use and resulting physical deterioration of these facilities. Therefore, with the payment of fees by the related projects and any other future residential development within the city as well as the neighboring jurisdictions, and the provision of passive open space and recreational amenities on-site, construction and operation of the project, in conjunction with the related development, would not cumulatively contribute to impacts related to the increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Cumulative impacts during project construction and operation would be *less than significant*.

As described in REC Impact 2, construction of the project includes enhancements and modifications to existing recreational facilities which could have an adverse physical effect on the environment. Because construction of the project could result in these direct impacts, the potential exists for the project to also contribute significantly to cumulative impacts. If mitigation were not to be implemented, it is conceivable that the project would significantly contribute to these impacts. Therefore, the project's contribution could be cumulatively considerable; impacts could be *significant*.

Project mitigation measures have been identified and included to address the project's adverse physical effect on the environment, as identified in REC Impact 2. The identified mitigation measures would address the direct impacts associated with the project itself as well as the project's potential contribution to cumulatively considerable and significant construction impacts related to the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

REC Impact 3

Prior to the application of proposed project mitigation measures, the project could contribute to cumulative impacts associated with adverse physical effects on the environment. Cumulative construction impacts could be significant. Operation of the project would not contribute to cumulative impacts.

Mitigation Measures

Implement construction-related Mitigation Measures AES/mm-4.1, AQ/mm-3.1; BIO/mm-1.1, BIO/mm-2.1, BIO/mm-3.1, BIO/mm-5.1 and 5.2, and BIO/mm-6.1; CR-ARCH/mm-1.1 through 1.4; GEO/mm-3.1 and 3.2, GEO/mm-4.1, and GEO/mm-6.1 through 6.5; GHG/mm-1.1; HAZ/mm-1.1 through 1.3, and HAZ/mm-2.1; NOI/mm-1.1; TRA/mm-4.1 through 4.3; and TCR/mm-1.1 through 1.4.

Impacts Following Mitigation

With implementation of the project's construction-related mitigation measures referenced above, the project's contribution to cumulative construction impacts would be less than significant.

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