

4.1 LAND USE AND RELEVANT PLANNING

The purpose of this section is to discuss the impacts of the Dana Point Harbor Revitalization Plan implementation upon land uses in the Harbor and adjacent areas. This section provides a discussion of existing conditions, including on-site and offsite land uses. Potential impacts of the proposed Project are examined, including consistency with the *California Coastal Act, City of Dana Point Specific Plan Local Coastal Program* (April 1980); and the *County of Orange General Plan* (July 2003).

Information used in this section was obtained from a site reconnaissance performed by RBF personnel in October, November, and December of 2003, January 2004, and June 2005; review of the *California Coastal Act – Article 3, County of Orange General Plan, Dana Point General Plan* (July 1991), the *Dana Point Specific Plan/Local Coastal Program, Planned Community Text* (July 1991), and the USGS 7.5-Minute Topographic Map of Dana Point, California, Quadrangle (photo revised 1975).

4.1.1 EXISTING CONDITIONS

4.1.1.1 PROJECT LAND USES

Existing conditions in the Harbor are also described in detail in Section 3.3, Existing Conditions.

HARBORWIDE

The proposed 276.8-acre Project site is nestled against steep bluffs that in some areas are in excess of 70 feet above the existing Dana Point Harbor Drive. The general configuration of the Harbor includes a Landside Area (Planning Areas 1, 2, 3, 5, 6, and 7) adjacent to the bluffs, an Island Area (Planning Area 4), and the Marinas (Planning Areas 8, 9, 10, 11, and 12) that includes slips and docks such as the commercial fishing slips, the bait receiver, fuel dock and the Sea Explorer Dock. The Landside of the Harbor area provides a variety of recreational, commercial, retail, sporting, and commercial boating amenities within the Dana Wharf and Mariners' Village. Amenities to the east of Island Way include the Marina Inn (a 136room hotel), numerous restaurants, and small retail and gift shops. West of Island Way are the Ocean Institute, Baby Beach, and the County-operated Youth and Group Facility. Planning Area 4 (the Island) is accessed by a bridge extending across the Marina Area and includes the Dana Point Yacht Club, Dana Point West Yacht Club, vehicle parking and boat storage areas, a restaurant, and a Harbor Patrol facility. Planning Area 4 also has a linear park with a meandering walk, grassy area, restrooms and park cabanas along the southern edge, providing picnicking opportunities for the public. The Marinas have combined facilities for approximately 2,493 boats. Planning Area 1 contains the boat launch, and a boat storage and maintenance area. There is human powered craft launching in Planning Area 8 at Baby Beach. Portions of Areas 8 and 11 are federal anchorage areas and Planning Area 12 is a federal navigation channel.

For additional information regarding existing on-site features, refer to Section 3.3 (Existing Conditions) and Exhibit 3-2 (Site Vicinity Map).



COMMERCIAL CORE

The Commercial Core (Planning Areas 1 and 2) currently provides <u>over</u> 77,900 square feet of commercial, retail, and restaurant uses, including Mariners' Village (middle area Planning Area 2), Mariners Alley (western portion of Planning Area 2), and Dana Wharf (southeastern portion of Planning Area 2). Fourteen restaurants (including Harpoon Henry's, El Torito Grill, Wind & Sea, the Harbor Grill, The Brig, and others) and 25 retail shops are located in the Commercial Core. Dana Wharf Sportfishing which provides boat and fishing charters, is also located within Planning Area 2.

Located in the central portion of Planning Area 1, the Embarcadero Marina includes a public boat launch, non-motorized boat launch, jet ski and boat rentals, a hoist for launching and retrieving boats, and 443 dry boat storage spaces. The Dana Point Harbor Shipyard also provides boat services, with a repair facility, marine hardware store, and a hoist. In addition, the Catalina Express provides ferry service to Catalina Island.

OFF-SITE AREAS

Two off-site Project areas have been identified for interim parking and boat storage areas during construction activities, as well as potential long-term use for parking and/or boat storage:

- <u>Selva Parking Lot</u>. The 28.6-acre Selva Parking Lot is located west of the Harbor, with access provided via Selva Road extending from PCH. The lot is owned by the County of Orange and is fully improved, with 600 paved public parking spaces, lighting, and landscaping.
- SCWD Lot. The 117.5-acre South Coast Water District (SCWD) Lot is primarily utilized for auxiliary storage of new cars, trucks, boats, truck containers, and gravel, with a partially improved portion used for maintenance facilities. Access to this area is provided via a driveway along Pacific Coast Highway (PCH), approximately one mile northeast of the Harbor (a new access is currently under construction off of Stonehill Drive). A fenced palm tree nursery is located within the northernmost portion of the lot. Access to the nursery is provided via a private dirt roadway along Doheny Park Road. The SCWD Lot has a Coastal Development Permit for boat and vehicle storage activities.

4.1.1.2 ADJACENT LAND USES

HARBORWIDE

Land uses outside the Harbor boundary (generally to the north and west along the coastal bluffs) are harbor-oriented commercial and residential properties. Views of the Pacific Ocean and Dana Point Harbor play an important role for the properties. The area generally to the northwest includes the Old Cove Marine Life Reserve (formerly known as the Old Cove Marine Preserve) and the Old Cove Native Plant Preserve; the area to the west atop the bluffs includes the Dana Point Headlands, the Chart House Restaurant, residential units, and Cannon's Restaurant. Further



north is a bed-and-breakfast inn, the Sampson Overlook, Heritage Park, and residential units. A commercial center is located at the northwest corner of Dana Point Harbor Drive and the Street of the Golden Lantern. Northeast of the Street of the Golden Lantern are the continuation of the bluffs with residential units, Lantern Bay Park, and the Laguna Cliffs Marriott Hotel; and a small commercial center is located adjacent to the northeastern portion of the Harbor, at the intersection of PCH and Dana Point Harbor Drive. To the east of the Harbor are an existing vacant lot and Doheny State Beach; the Pacific Ocean is located to the south. Opportunities for swimming, beach-combing, tide-pooling, and boating are also available at Doheny Beach, which is located immediately east of Planning Area 1.

COMMERCIAL CORE

The Commercial Core area is located in the northeastern portion of the Harbor. Adjacent uses are Planning Area 3 to the west (which includes boater services and the Marina Inn Hotel); Doheny State Beach to the northeast; the marina and island uses to the south; and Dana Point Harbor Drive, retail, and bluffs to the north.

OFF-SITE AREAS

SCWD LOT

Land uses surrounding the SCWD Lot include the extension of Stonehill Drive to the north, partially improved San Juan Creek to the west, and the extension of PCH to the south. The Atchison, Topeka and Santa Fe Railroads are located immediately adjacent to the eastern boundary of the SCWD Lot, with industrial and commercial uses beyond. A mobile home park (located across the railroad) and a dirt roadway that includes an at-grade private railroad crossing for access to the palm tree nursery are located to the northeast of the lot.

SELVA PARKING LOT

The area surrounding the Selva Parking Lot includes office uses to the north, a multifamily complex to the east, vegetated hillsides to the south, and the Headlands Project to the west.

4.1.1.3 APPLICABLE REGULATIONS

STATE SOVEREIGN LANDS

The State of California (State) acquired ownership of all previously ungranted tidelands, submerged lands, and beds of navigable waterways upon its admission to the United States in 1850. The State holds these lands for the benefit of all the people of the State for waterborne commerce, navigation, fisheries, water-related recreation, habitat preservation, and open space purposes. The landward boundaries of the State's sovereign interests are under the jurisdiction of the State Lands Commission (SLC).

Tidelands are those lands that lie between the lines of the high tide and the mean low tide; submerged lands lie below the line of mean low water. The SLC has the review responsibility for tidal and submerged lands legislatively granted in trust to



local jurisdictions. All tidelands and submerged lands, granted or ungranted, are subject to the Common Law Public Trust, which is a sovereign public property right held by the State-delegated trustee for the benefit of all people. Dana Point Harbor is held in trust by the County of Orange, in accordance with the State Tidelands Grant.

CALIFORNIA COASTAL ACT OF 1976

Coastal Act consistency, authority, and process are also addressed in Section 3.0 and in the following discussions regarding County and City roles. Coastal Act compliance is also addressed in Appendix L, Relevant Planning Consistency. The California Coastal Act of 1976 (California Public Resources Code §30000 et seq.) sets State policies for the conservation and development of California's coastline by addressing public access, coastal recreation, the marine environment, coastal land resources, and coastal development. Under provisions of the Coastal Act, each local government along the coast must develop a Local Coastal Program (LCP) consistent with these policies. An LCP consists of a land use plan, zoning documents, and other implementing actions. The California Coastal Commission (CCC) exercises regulatory authority over development within the Coastal Zone (CZ) until the local LCP is certified by the CCC, at which time primary land use authority reverts to the local level under authority of the certified LCP. The Dana Point Harbor is entirely within the CZ. As part of the City's incorporation process, the LCP has been adopted by the City of Dana Point (City) and certified by the CCC. Therefore, the Harbor is under the jurisdiction of both the City of Dana Point (landside projects) and the CCC (for waterside projects). All landside improvements must be consistent with a certified LCP, and require a Coastal Development Permit (CDP) from the City. All waterside improvements must be reviewed and approved by the California Coastal Commission, and require a CDP from the Coastal Commission.

REGIONAL PLANS AND POLICIES

Southern California Association of Governments (SCAG)

Regional planning agencies such as the Southern California Association of Governments (SCAG) recognize that planning issues extend beyond the boundaries of individual cities. Efforts to address regional planning issues such as affordable housing, transportation, and air pollution have resulted in the adoption of regional plans that affect both the City and the County.

The Federal government mandates SCAG, as the designated MPO to research and draw up plans for transportation, growth management, hazardous waste management, and air quality. These mandates led SCAG to prepare comprehensive regional plans to address these concerns.

SCAG maintains a continuous, comprehensive, and coordinated planning process, which is articulated as a Regional Transportation Plan (RTP) and a Regional Transportation Improvement Program (RTIP). SCAG is responsible for the development of demographic projections, as well as the integrated land use, housing, employment, transportation programs, measures, and strategies portions of the South Coast Air Quality Management Plan (SCAQMP). The following regional plans affect planning for the Harbor in the City of Dana Point.



South Coast Air Quality Management Plan (2003 AQMP)

The South Coast Air Quality Management District (SCAQMD) has prepared multiple AQMPs to reduce air pollution by five percent a year. The most recent (2003) AQMP was adopted by the SCAQMD on August 1, 2003. The 2003 AQMP: updates the attainment demonstration for the Federal standards for ozone and particulate matter (PM_{10}); replaces the 1997 attainment demonstration for the Federal carbon monoxide (CO) standard; provides a basis of a maintenance plan for CO for the future; and updates the maintenance plan for the Federal nitrogen dioxide (NO_2) standard that the South Coast Air Basin has met since 1992.

COUNTY OF ORANGE

All development within the Dana Point Harbor has been historically regulated by the County under the *Dana Point Harbor Planned Community District Development Plan.* The Dana Point Harbor property was designated as a "Planned Community" (PC) District by Ordinance Number 2331, as adopted by the Orange County Board of Supervisors on July 22, 1969. The County of Orange owns, operates, and has the primary authority for development, maintenance, and operation of land uses and activities within the Harbor. As noted previously, the County is the trustee of the Harbor for the people of the State of California, pursuant to the State Tidelands Grant. As landowner, all Harbor operations are managed by the Dana Point Harbor Department. The marinas, hotel, and other private operations are managed under various operations, management, and/or lease agreements controlled by the County of Orange. The County also provides emergency response and police services through the Orange County Fire Authority, Orange County Sheriff, and Harbor Patrol.

Subsequent to its adoption of the *City of Dana Point Specific Plan* (April 1980) and in accordance with the *California Coastal Act*, the County prepared an *LCP* that reorganized the information and land use policies in the *Dana Point Specific Plan* for areas located within the CZ boundary to facilitate the evolution of the Specific Plan in light of the *California Coastal Act* requirements. This document, certified by the CCC in 1981, is referred to as the *South Coast Planning Unit Local Coastal Program*. The *LCP* is composed of a Land Use Plan (consisting of an inventory of Coastal Act Policies, an issues analysis, and a listing of policy statements to be incorporated into future projects satisfying the requirements) and an *Implementing Actions Program* (that includes the *Dana Point Specific Plan* Land Use Regulations, procedures, and District Maps).

When the City of Dana Point incorporated in 1989, it consolidated three distinct communities; Dana Point, Monarch Beach, and Capistrano Beach. These communities had been developed under separate specific plans, which specified the zoning for each; the *Dana Point Harbor Planned Community Development Plan* specified the zoning for Dana Point Harbor.

COUNTY OF ORANGE GENERAL PLAN

The Harbor is shown as a Regional Recreation area in the County General Plan. However, as discussed below, the Project lies entirely within the incorporated City of Dana Point, and the "land-side" areas fall under the jurisdiction of the City of Dana Point's certified Local Coastal Plan. The current zoning for the Harbor is established



by the Dana Point Harbor Planned Community Development Plan, which is the implementation program for the Harbor portion of the City's LCP.

CITY OF DANA POINT

Since the incorporation of the City of Dana Point in 1989, the City has systematically worked to create a comprehensive general plan that includes all mandatory components necessary to satisfy California land use laws and the Subdivision Map Act, and the Coastal Act, as well as a stand-alone zoning ordinance. In July 1991, the Land Use Plan (LUP) components of the *Local Coastal Plan (LCP)* were incorporated into the *City of Dana Point General Plan* (City General Plan). As part of the *City General Plan* update (October 1999), all the land uses within the *LCP* (with the exception of the Harbor) were updated and included a comprehensive analysis of Coastal Act Policies.

As indicated in the City General Plan Land Use Element, the City of Dana Point considers the Harbor one of the most significant resources in defining the character of this coastal community. The Harbor provides a unique blend of natural features and human-made amenities that include visitor/recreation commercial, community facilities, recreation/open space, and harbor marine land and water uses.

The Harbor is located within the *Dana Point Harbor Specific Plan*, which includes various land use designations (e.g., visitor/recreation commercial, community facilities, recreation/open space, and harbor marine land and water uses).

The SCWD Lot is located within the Doheny Village Specific Plan area and designated as Community Facilities, Industrial, and a small portion as Recreational/Open Space.¹ The Selva Parking Lot is not located within a specific plan area; it is designated Community Facilities, allowing for parking.

CITY OF DANA POINT ZONING CODE

The *City of Dana Point Zoning Code (Zoning Code)* was expanded to include general and special implementation provisions, development standards, regulations, and procedures and land use intensity restrictions, as required by the *California Coastal Act*. The *Zoning Code* serves as the implementing program of the City's *LCP*. Because of the Harbor's uniqueness, being owned and operated by the County of Orange and being partially covered as part of an existing certified LCP, the City of Dana Point has adopted the regulations established over 30 years ago for the Harbor and remains under the regulatory provision of the *Dana Point Specific Plan/Local Coastal Plan,* which was approved by the County of Orange in 1981 and certified by the Coastal Commission in 1985.

¹ However, SCWD is a responsible agency according to state law. In November 2001 the City of Dana Point approved a Coastal Development Permit for the SCWD Lot to allow for temporary boat storage and vehicle storage. E-mail correspondence with Ms. Genia Garcia, AICP, Senior Planner, City of Dana Point.



4.1.2 METHODOLOGY

As discussed in the Section 3.0 (Project Description), recognizing obvious economic and operational inefficiencies of the Harbor by users, merchants, and boaters, the Orange County Board of Supervisors initiated a comprehensive planning process to ensure the future viability of the Harbor. Implementation of the Dana Point Harbor Revitalization Plan requires a comprehensive revision to the existing regulatory documentation to address: (1) deficiencies in policy and planning programs relevant to the Harbor; (2) refinements to existing and proposed land uses; (3) the provision of clear descriptions of the regulatory and procedural relationships between the County of Orange and City of Dana Point; and (4) the provision of a clear set of development standards and land use regulations by the County and for the City of Dana Point. The following analysis addresses land use and policy consistency with the applicable regulatory and County documents.

4.1.3 SIGNIFICANCE CRITERIA

Appendix G of the *California Environmental Quality Act (CEQA) Guidelines* was used as significance thresholds in this analysis. As such, a project will normally have a significant adverse environmental impact on land use if it will:

- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; refer to Impact Statements 4.1-1 (Compliance with the California Coastal Act), and 4.1-2 (Consistency with Other Planning Documents);
- Physically divide an established community; refer to Section 7.0 (Effects Found Not to be Significant);
- Conflict with any applicable habitat conservation plan or natural communities plan; refer to Section 4.7 (Biological Resources); and
- Result in land use compatibility conflicts with existing or proposed uses; refer to Section 7.0 (Effects Found Not to be Significant). As the Project represents a continuation of Harbor uses and maintains the overall smallcraft character of the Harbor, no land use compatibility conflicts are anticipated. This is further discussed in Impact Statement 4.1-3 and in respective EIR sections (i.e., air quality, noise, traffic, aesthetics).

4.1.4 **PROJECT IMPACTS**

4.1.4.1 COMPLIANCE WITH THE CALIFORNIA COASTAL ACT

Impact 4.1-1 The proposed Project will not conflict with the policies and standards of the California Coastal Act. Analysis below has concluded that a less than significant impact will occur in this regard.



HARBORWIDE

The *California Coastal Act* of 1976 sets forth policies and regulations that provide direction for development and conservation of California's coast. The proposed Project has been analyzed for consistency with applicable regulations contained in the *California Coastal Act* of 1976. As discussed in Section 3.0 and the preceding text in this section, the City of Dana Point's LCP is the applicable Coastal Act regulatory document for Dana Point Harbor. All land-side improvements must be consistent with a certified LCP, and requires a Coastal Development Permit (CDP) to be issued by the City of Dana Point. All waterside improvements must be approved by the California Coastal Commission, and requires a CDP from the Coastal Commission.

One of the key goals in the Project is to update the Harbor to better reflect current City and Coastal Act requirements, including improving pedestrian circulation, boater/vehicular access, signage, water quality, and coastal/Harbor amenities. In order to accomplish the Project objectives, it will be necessary to update the current LCP. An LCP Amendment (LCPA) be prepared and locally adopted by the City of Dana Point with input from the County, and then certified by the Coastal Commission. The LCPA will reflect the Project Design Features and the Planning Area development and design concepts (described in Section 3.0).

It is important to note that the Project does not include any major land use changes, other than certain renovated, replaced, and/or new buildings and related infrastructure to better serve visitors, boaters, and existing Harbor uses (see Section 3.0). As the Project will necessitate an LCPA, it is by definition "inconsistent" with the current LCP. This is, however, not considered a significant impact, as the Project and the future LCPA will improve overall Coastal Act compliance (refer to Appendix L of this EIR, which contains an analysis of the Project in relation to key Coastal Act policies).

It should also be noted that, although the LCPA is a subsequent discretionary approval under the jurisdiction of the City and Coastal Commission, it is the intent of this Program EIR to provide sufficient comprehensive environmental analysis such that any subsequent CEQA documentation is minimized.

COMMERCIAL CORE

Refer to the consistency analysis in the Harborwide discussion, above.

OFF-SITE AREAS

Refer to the Harborwide analysis, above.

4.1.4.2 CONSISTENCY WITH OTHER PLANNING DOCUMENTS

Impact 4.1-2 The proposed Project will not conflict with the land use plan, and policies of SCAG's RCPG or State Tidelands Grants. Analysis has concluded that a less than significant impact will occur with approval of requested amendments.



HARBORWIDE

<u>SCAG's RCPG</u>. The consistency analysis of the proposed Project with applicable policies of SCAG's Regional Comprehensive Plan and Guide (RCPG) is provided in Appendix L to this EIR. Compliance with the RCPG is voluntary as the Project is not regionally significant per SCAG policies. The Project is considered consistent with the relevant and applicable policies of the RCPG, and thus will not result in a significant impact in this regard.

<u>State Tideland Grants</u>. The proposed Project will not conflict with the State Tidelands Grant. The proposed Project does not entail the sale of any tidelands to a private entity; rather, the individual parcels will be leased to private businesses and remain under the control of the County of Orange. There is no change proposed to the manner in which the Harbor and businesses currently operate. Additionally, the proposed Project will consist of uses consistent with the Tidelands Grant (e.g., recreation, commercial fishing, and harbor commerce). Therefore, the proposed Project will be consistent with the State Tidelands Grant and a less than significant impact will occur in this regard.

4.1.4.3 LAND USE COMPATIBILITY

Impact 4.1-3 The proposed Project, due to temporary construction activities and/or long-term maintenance or operations, may result in conflicts with existing or future land uses. In consideration of Project Design Features and SCAs, no significant impacts are anticipated.

This discussion focuses on potential "land use" compatibility issues. Other issues related to and affecting adjacent and on-site land uses are discussed in the applicable EIR section(s), such as air quality, noise, traffic/parking, and aesthetics. The Project is not anticipated to result in any significant land use compatibility issues, as the Project has been developed consistent with the 1998 Task Force goals, including keeping the Harbor's smallcraft character. Certain temporary issues are addressed in appropriate EIR sections, particularly maintenance of pedestrian and visitor/patron access during construction. The Project includes a number of important design elements, discussed in Section 3.0 and noted as Project Design Features in Section 4.0. In addition, the Planning Areas have been established to facilitate establishing development standards as part of the City's LCPA process.

4.1.5 CUMULATIVE IMPACTS

Impact 4.1-5 The proposed Project, combined with other future development, could increase the intensity of land uses in the area. Analysis has concluded that impacts are less than significant and no mitigation is recommended.

The scope of cumulative impacts related to land use and relevant planning is limited to the immediate Harbor area, as the Project is consistent with the current County General Plan land use designation. Revitalization of the Harbor as proposed will not result in any cumulatively significant land use impacts as other projects are implemented in the area. Each proposed Harbor project will require approval of a



Coastal Development Permit at a precise level of design in order to preclude potential land use compatibility issues and planning policy conflicts. The Dana Point Harbor Revitalization Project limits the maximum amount of cumulative development in the Harbor. Additionally, the analysis has determined that there is no finding of inconsistency with applicable plans or policies. Thus, no significant cumulative land use impact is anticipated and no mitigation is required.

4.1.6 **PROJECT DESIGN FEATURES**

The proposed Project includes features that reduce or eliminate potential impacts to environmental resources. The following Project Design Features (PDFs) are specified to be implemented:

PDF 4.1-1 Construction Phasing for the Harbor Revitalization Plan has been designed to minimize the disruption of vehicular and pedestrian access routes and parking availability throughout the Harbor. In the event of temporary closures, alternate routes and clear directional signage will be provided.

4.1.7 STANDARD CONDITIONS OF APPROVAL

Controls are imposed on new developments through the permitting process via the adoption of conditions of approval or through enforcement of existing ordinances and regulations. The County has developed extensive guidelines for development that will be implemented as the proposed Project is carried out. Existing applicable County of Orange Standard Conditions of Approval (SCA) are identified below.

- SCA 4.1-1 If the County proposes changes regarding the location or alteration of any use or structure, the County shall submit a revised plan to the Director of the County's Planning Division.
- SCA 4.1-2 Provision for continuous maintenance of a Landscape Maintenance program shall be assured.
- SCA 4.1-3 Prior to the issuance of any precise grading permit, a site plan delineating the capacity, number, and location of all proposed solid waste and recyclable collection areas shall be approved.

4.1.8 MITIGATION MEASURES

4.1.8.1 HARBORWIDE

CONSISTENCY WITH THE CALIFORNIA COASTAL ACT

MM 4.1-1a The Project will require a Local Coastal Plan Amendment and subsequent Coastal Development Permits to ensure consistency with the California Coastal Act and Local Coastal Plan.



CONSISTENCY WITH OTHER DOCUMENTS

No Additional Mitigation Required.

LAND USE COMPATIBILITY

- MM 4.1-3a Access to the Marina Service areas shall be maintained during all construction phases. A Construction Management Plan shall be prepared identifying the configuration of construction staging areas temporary access routes, and parking areas and will be submitted in conjunction with review of Coastal and/or Site Development Permits for each phase of development.
- MM 4.1-3b A comprehensive signage program for public access shall be implemented in conjunction with the construction of the Commercial Core Area and subsequent planning areas within the Harbor to inform the public of the availability of, and provide direction to, public parking areas, coastal access and on-site recreational amenities.

CUMULATIVE IMPACTS

No Additional Mitigation Required. Based on the analysis provided above, with the incorporation of the Project Design Features, the proposed Project will not result in significant land use or relevant planning impacts.

4.1.8.2 COMMERCIAL CORE

CONSISTENCY WITH THE CALIFORNIA COASTAL ACT

No Additional Mitigation Required.

CONSISTENCY WITH OTHER DOCUMENTS

No Additional Mitigation Required.

LAND USE COMPATIBILITY

No Additional Mitigation Required.

CUMULATIVE IMPACTS

No Additional Mitigation Required.

4.1.8.3 OFF-SITE AREAS

Refer to Mitigation Measures MM 4.1-3a and MM 4.1-3b.



4.1.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No unavoidable significant impacts related to Land Use or Relevant Planning have been identified.