

5.12 POPULATION AND HOUSING

This section of the Draft Environmental Impact Report (Draft EIR) addresses the potential for the proposed Section 31 Specific Plan Project (“Specific Plan Project” or “Project”) to induce substantial population or housing growth that would result in impacts to the environment or directly impact existing housing. To determine if the Project would result in substantial population or housing growth, the consistency of the Project with current growth projections is assessed. The relationship of the Project to the regional planning policies of the Southern California Association of Governments (SCAG), the Coachella Valley Association of Governments (CVAG), and the current City of Rancho Mirage General Plan Housing Element are also discussed.

Prior to the preparation of this Draft EIR, an Initial Study (included in **Appendix A** of this Draft EIR) was prepared using the California Environmental Quality Act (CEQA) Guidelines Appendix G Environmental Checklist Form to assess potential environmental impacts associated with population and housing. The following Initial Study screening criterion related to population and housing do not require additional analysis in this Draft EIR:

- Potential impacts related to the displacement of substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, were evaluated and determined to have “No Impact” in the Initial Study. The Project Site is currently vacant and implementation of the Project would include the construction of new housing. Therefore, this issue is not addressed any further within this section.

Impacts found to be less than significant are further discussed in **Section 8.1: Effects Not Found to be Significant** of this Draft EIR. Please see **Section 9.0** for a glossary of terms, definitions, and acronyms used in this Draft EIR.

A. ENVIRONMENTAL SETTING

1. Existing Conditions

Riverside County

Riverside County (County) has experienced substantial growth in population over the past few decades. According to the California Department of Finance (DOF), the County population grew from an estimated 1,545,387 in 2000 to 2,189,641 in 2010,¹ an increase of approximately 42 percent. As of January 2018, the

1 California Department of Finance (DOF), Demographic Research Unit, *E-8 Historical Population and Housing Estimates for Cities, Counties, and the State, 2000-2010*, November 2012, accessed May 2019, located at <http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-8/2000-10/>.

County's population further increased to 2,415,955,² an increase of approximately 10 percent over the 2010 population. According to the United State Census Bureau, the County had a median age of 33.7 in 2010;³ this had increased to 35 in 2017.⁴

The County had 800,707 housing units in 2010, of which approximately 86 percent, or 686,260 units, were occupied. The number of housing units increased to approximately 840,904 in 2018, an increase of approximately 5 percent, with an occupancy rate of approximately 86.8 percent, or approximately 729,920 units.⁵

Additionally, the County contained a total estimated employed population of 869,427 in 2010, increasing to 1,813,707 in 2017.⁶

City of Rancho Mirage

According to the DOF, the City of Rancho Mirage (City) grew from a population of 17,218 in 2010 to 18,738 in 2018,⁷ an increase of approximately 9 percent. The City's population accounted for approximately 4 percent of the Coachella Valley's total population and less than 1 percent of the County of Riverside's total population. As of 2018, the City had a total of 14,492 housing units, approximately 63.6 percent of which, or 9,224 units, were occupied. The vacancy rate within the City was approximately 36.4 percent, or 5,268 units, which is a result of many of these units serving as second or vacation homes for part-time residents. In 2017, the City had a median age of 65.9 years compared with those of Riverside County (35.0), the State (36.1), and the Nation (37.8).⁸ In addition, the proportion of seniors age 65 and older was higher in 2017 (52 percent) than in both 2010 (44 percent) and 2000 (43 percent).

2 California Department of Finance (DOF), Demographic Research Unit, *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2018 with 2010 Census Benchmark*, May 1, 2018, accessed April 2019, available at <http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/>.

3 United States (US) Census Bureau, *2010 Census*, accessed May 2019, <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>.

4 US Census Bureau, *2013-2017 American Community Survey 5-Year Estimates*, accessed May 2019, <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>.

5 California Department of Finance (DOF), Demographic Research Unit, *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2018 with 2010 Census Benchmark*, May 1, 2018, accessed April 2019, available at <http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/>.

6 US Census Bureau, *2013-2017 American Community Survey 5-Year Estimates*, accessed May 2019, <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>.

7 DOF, Demographic Research Unit, *Report E-5: Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011-2018, with 2010 Benchmark*, May 1, 2018.

8 US Census Bureau, *2013-2017 American Community Survey 5-Year Estimates*, accessed May 2019, <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>.

According to the DOF, as of January 2018 the population in the City is 18,738, an increase of approximately 4 percent over the 2017 population estimate.⁹

2. Regulatory Setting

State

California Housing Element Law

California planning and zoning law requires each city and county to adopt a general plan for future growth.¹⁰ This plan must include a housing element that identifies the housing need for all economic segments and provides opportunities for housing development to meet that need. At the state level, the Housing and Community Development Department estimates the relative share of California's projection population growth that would occur in each county within the state, based on DOF population projections and historical growth trends. Where there is a regional council of governments, the California Housing and Community Development Department provides the regional housing need to the council. The regional council then assigns a share of the regional housing need to each of its cities and counties. The process of assigning shares provides cities and counties the opportunity to comment on the proposed allocations. The Housing and Community Development Department oversees the process to ensure that the council of governments distributes its share of the state's projected housing need.

Each city and county must update its general plan housing element on a regular basis (generally, every eight years). Among other things, the housing element must incorporate policies and identify potential sites that would accommodate the city's share of the regional housing need. Before adopting an update to its housing element, the city or county must submit the draft to the state Housing and Community Development Department for review. The department will advise the local jurisdiction whether its housing element complies with the provisions of California Housing Element Law.

The councils of governments are required to assign regional housing shares to the cities and counties within their region on a similar eight-year schedule. At the beginning of each cycle, the Housing and Community Development Department provides population projections to the councils of governments, who then allocate shares to their cities and counties. The shares of regional need are allocated before the end of the cycle so that the cities and counties can amend their housing elements by the deadline.

9 California Department of Finance (DOF), Demographic Research Unit, *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2018 with 2010 Census Benchmark*, May 1, 2018, accessed April 2019, available at <http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/>.

10 California Government Code, sec. 65300.

Regional and Local

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is a council of governments representing Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. SCAG is the federally recognized Metropolitan Planning Organization (MPO) for this region, which encompasses more than 38,000 square miles. SCAG is a regional planning agency and a forum for addressing regional issues concerning transportation, the economy, community development, and the environment. SCAG is also the regional clearinghouse for projects requiring environmental documentation under federal and state law. In this role, SCAG reviews proposed development and infrastructure projects to analyze their impacts on regional planning programs. As the southern California region's MPO, SCAG cooperates with the Southern California Air Quality Management District (SCAQMD), the California Department of Transportation (Caltrans), and other agencies in preparing regional planning documents. SCAG has developed regional plans to achieve specific regional objectives.

SCAG is also responsible for the designated Regional Transportation Plan (RTP), including its Sustainable Communities Strategy (SCS; together, RTP/SCS) component pursuant to Senate Bill 375. The primary goal of the RTP is to increase mobility for the region's residents and visitors, as well as for commerce and goods movement. The Sustainable Communities Strategy has been formulated to reduce GHG emissions from passenger vehicles by 8 percent per capita by 2020 and by 13 percent per capita by 2035 compared to 2005 targets set by the California Air Resources Board.

As part of the 2016–2040 RTP/SCS, SCAG prepared the Regional Growth Forecast, which contains a set of socioeconomic projections. Categorized by county and city, the report includes historical data from 2012, as well as projections of population, housing, and employment for 2040. The socioeconomic estimates and projections in the Growth Forecast are used for federal- and State-mandated long-range planning efforts, such as the RTP, the Air Quality Management Plan (AQMP), the Regional Transportation Improvement Program (RTIP), and the RHNA. The estimates also provide guidance to local governments in planning for jobs and housing. The SCAG population, households, and employment projects for Riverside County are shown in **Table 5.12-1: SCAG Projections for Riverside County**.

Table 5.12-1
SCAG Projections for Riverside County

	2020	2035	2040
Population	2,592,000	3,324,000	3,183,700
Households	834,000	1,092,000	1,054,300
Employment	939,000	1,243,000	1,174,300

Source: SCAG 2016 RTP/SCS

The SCAG population, households, and employment projects for the City are shown in **Table 5.12-2: SCAG Projections for City of Rancho Mirage**.

Table 5.12-2
SCAG Projections for City of Rancho Mirage

	2020	2035	2040
Population	18,600	24,200	25,000
Households	9,600	13,100	13,600
Employment	16,100	19,900	20,500

Source: Ping Chang, Acting Manager, Compliance and Performance Monitoring, SCAG, letter correspondence, September 27, 2018.

The 2017 City of Rancho Mirage General Plan Update (adopted November 2017), projects a population of 25,573 for the City upon build out¹¹ and SCAG forecasts the City's population at 25,000 persons in 2040, as shown in **Table 5.12-2**. As such, forecasted growth for the City in the 2017 General Plan is generally consistent with SCAG's forecasts.¹²

Further, the 2016–2040 RTP/SCS links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socioeconomic, geographic, and commercial limitations. The Project's consistency with the applicable policies of the 2016–2040 RTP/SCS is provided in **Section 5.10: Land Use and Planning** of this Draft EIR.

11 City of Rancho Mirage, *General Plan 2017 Update*, 13,

12 City of Rancho Mirage, *Rancho Mirage General Plan Update: Addendum to the Final Environmental Impact Report*, October 2017, accessed April 2019, available at <https://www.ranchoirageca.gov/wp-content/uploads/2017/11/Draft-Addendum-to-the-2005-General-Plan-Final-EIR.pdf>.

Coachella Valley Association of Governments

The Coachella Valley Association of Governments (CVAG) is a subregional organization within SCAG. CVAG operates as the lead agency and as part of larger jurisdictional or regional teams within the Coachella Valley, made up of ten cities, Riverside County and two Native American Indian tribes. CVAG represents member local governments and agencies throughout the Coachella Valley seeking cooperative subregional and regional planning, coordination and technical assistance on issues of mutual concern. CVAG is made up of several departments, including an Energy and Environmental Resources Department that monitors and implements both regional and local plans related to energy and air quality, waste management, water quality, habitat conservation planning, and trails issues. The SCAG population, households, and employment projections for the CVAG subregion are shown in **Table 5.12-3: SCAG Projections for CVAG Subregion**.

**Table 5.12-3
SCAG Projections for CVAG Subregion**

	2020	2035	2040
Population	604,000	884,000	1,006,748
Households	213,000	304,000	351,900
Employment	245,000	315,000	460,800

Source: SCAG 2016 RTP/SCS

City of Rancho Mirage General Plan

Government Code Section 65300 et seq. requires that each county and city prepare and adopt a comprehensive, long-term plan for its future development, often called the General Plan. The General Plan, which serves as the blueprint for planning and development in the City and indicates the community's visions for the future, must contain the following seven elements at minimum: Land Use, Circulation, Housing, Conservation, Open Space, Noise, and Safety. The City's existing General Plan was adopted in 2017.

Land Use Element

The Land Use Element of the City's General Plan provides a comprehensive plan of the general allocation and distribution of land uses throughout the City. The element also serves as a statement of the standards and targets for population density and building intensity. As mentioned previously, the 2017 City of Rancho Mirage General Plan Update (adopted November 2017), projects an additional 4,783 dwelling units and an estimated population of 25,573 people within the City upon build out. The City anticipates

the potential for an additional 2,307 dwelling units and 4,475 future residents within the City’s Sphere of Influence (SOI)¹³ for a combined total of 7,090 additional dwelling units and 30,048 residents by 2035. Further, the Land Use Element anticipates the potential for an additional 34,497 employees, including 6,277 within its SOI, in addition to a total of 12,444 employees estimated at the time of analysis for the 2017 General Plan update.¹⁴

Housing Element

The City’s General Plan Housing Element is intended to provide both citizens and public officials with a comprehensive understanding of the housing needs in Rancho Mirage. It sets forth policies and programs that will enable the City to reach its defined housing goals, helps to ensure that all residents attain a safe and decent living place in a satisfactory environment, and promotes a coordination of housing policies and programs at local, State, and federal levels. The 2014-2021 Housing Element addresses the housing needs of the City for the planning period through 2021. The following goal and policy from the Housing Element are relevant to the Project:

Goal 1: A variety of housing types that meet the needs of residents in the City.

Policy 1: The General Plan shall provide for a mixture of residential densities dispersed throughout the City.

B. ENVIRONMENTAL IMPACTS

1. Thresholds of Significance

In order to assist in determining whether a project would have a significant effect on the environment, the City finds a project may be deemed to have a significant population and housing impact if it would:

Threshold 5.12-1: Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

2. Methodology

This analysis considers population, housing, and employment growth that would occur with implementation of the Project and whether this growth is consistent with applicable regional growth forecasts. This analysis also considers whether this population, housing, and employment growth is

13 City of Rancho Mirage, *General Plan 2017 Update*, 13.

14 City of Rancho Mirage, *General Plan 2017 Update*, 14.

considered substantial with respect to remaining growth potential in the City, as defined in the City's General Plan. The most recent DOF population and housing estimates for the City were used in conjunction with the SCAG population projections to determine potential population and housing impacts.

3. Project Design Features

The Project does not include any features specifically related to population and housing.

4. Project Impacts

Threshold 5.12-1: Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Population Growth

As mentioned previously, the City of estimated 2018 population is 18,738 residents. With full development of the uses allowed by the General Plan, the City anticipates a maximum population of approximately 25,573 residents. Further, the City anticipates the potential for an additional 4,475 future residents within the City's SOI¹⁵ for a combined total of approximately 30,048 residents by 2035. Using an average household size of 2.025 persons, total population projected from buildout of the Project Site would add up to 1,932 additional residential units and 3,913 new residents to the City. The City's current General Plan designates approximately 175 acres of the Project Site as Resort Hotel (Rs-H) and approximately 443 acres as Very Low Density Residential (R-L-2). The eastern, southern, and western portions of the Project Site generally containing the proposed residential portions of the Project (Planning Areas 1, 2, and 3) are designated Very Low Density Residential; the northern central portion of the Project Site, generally in the vicinity of the proposed Town Center Planning Area and lagoon, is designated as Resort Hotel Commercial.¹⁶ Based on the maximum permitted residential density of 2 dwelling units/acre in the R-L-2 zone, the existing zoning/land use designation for the Project Site could accommodate up to 886 dwelling units and up to 1,794 potential residents.¹⁷ Additionally, the existing Rs-H zoning/land use designation on 175 acres could also accommodate more than double the hotel rooms and resort condominiums currently proposed by the Project, adding a substantial number of additional residents both on-site and in the surrounding area. Because substantially more of the Project Site is proposed for residential development instead of resort hotels and condominiums, it is difficult to make a direct

15 City of Rancho Mirage, *General Plan 2017 Update*, 13.

16 City of Rancho Mirage, *General Plan*, Chapter 2: Land Use, 9, adopted November 16, 2017.

17 Based on 2018 DOF estimates, the City of Rancho Mirage has an average household population size of 2.025 persons.
2.025 x 886 du = 1,794 persons.

comparison of the total population growth that would be caused by the Project versus the existing zoning and General Plan land use designations, but the overall population growth is considered to be generally comparable. As explained below, this overall population growth is consistent with City and CVAG projections, and can be accommodated by existing and planned future infrastructure.

The population increase associated with the Project would account for approximately 57 percent of the remaining capacity for population growth anticipated in the City's General Plan by 2035 and approximately 35 percent of the remaining capacity anticipated across the City and its SOI combined by 2035. Further, the Project-generated population increase would represent approximately 1 percent of the anticipated increase in residents within the CVAG region between 2020 and 2040. Public service and utility providers have indicated that they can accommodate the projected growth from the Project, as discussed in **Section 5.13: Public Services** and **Section 5.16: Utilities and Service Systems**, respectively, of this Draft EIR. Therefore, while development of the Project could potentially result in a somewhat greater population increase than that which could be enabled under existing zoning/land use designations, particularly with respect to the residential units constructed on the Project site, any such increase is consistent with City and regional growth projections, and public service providers and utilities and service systems can adequately accommodate this growth. Accordingly, the Project would not result in a population increase in substantial excess of what is anticipated by the City. Impacts would be less than significant.

Housing

The number of housing units in the City in 2018 is estimated at 14,492 units.¹⁸ The Project would add up to 1,932 residential dwelling units within the Project Site. The City has a potential to accommodate a maximum of approximately 19,275 dwelling units, determined at the time of analysis during the City's 2017 General Plan update process within current City boundaries. The housing increase associated with the Project would account for approximately 40 percent of the estimated remaining housing capacity in the City¹⁹ and approximately 44 percent of the anticipated increase in number of households projected by SCAG for the City by 2040.²⁰ Since the Project Site represents a substantial portion of the remaining vacant land in the City and, as discussed above, it has been demonstrated that public service and utility providers have adequate capacity to accommodate the population increase associated with the Project. Further, the goals and policies of the City's Housing Element support the development of a variety of

18 California Department of Finance, Demographic Research Unit, *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2018 with 2010 Census Benchmark*, "Table 2: E-5 City/County Population and Housing Estimate, 1/1/2018," May 1, 2018, accessed April 2019, available at <http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/>.

19 $19,275 \text{ maximum du} - 14,492 \text{ current du} = 4,783 \text{ du}$. $1,932 \text{ proposed du} / 4,783 \text{ du} = 0.40$.

20 $13,600 \text{ estimated households} - 9,224 \text{ currently occupied households} = 4,376$. $1,932 / 4,376 = 0.44$

housing types and residential densities within the City, as proposed in the Section 31 Specific Plan. Therefore, while implementation of the Project would result in a direct increase in population and housing, this increase is consistent with projected residential growth for the City.

Employment

The Eisenhower Medical Center, Agua Caliente Casino Resort Spa, Westin Mission Hills Resort & Villas, Rancho Las Palmas Resort & Spa, and the Home Depot are the top five private employers in the City.²¹ Approximately 44 percent of Rancho Mirage residents participate in the labor force, second lowest for cities in the Coachella Valley.²² Using an estimated total of 9,224 occupied housing units in the City as of 2018²³ and approximately 12,444 employees²⁴ determined within City limits at the time of analysis for the City's 2017 General Plan update, the City has a ratio of approximately 1.35 jobs per household. An employment to housing ratio in the range of 0.75 to 1.5 is considered beneficial for a number of reasons, including reducing vehicle miles traveled (VMT), less traffic congestion, and better air quality.²⁵ The City's projected increase in employment with full development of the uses allowed by the General Plan by 2035 is approximately 28,220 employees within current City boundaries and 34,497 employees when including the SOI.²⁶ As mentioned previously, the City has a potential to accommodate a maximum of approximately 19,275 dwelling units by 2035 within current City boundaries. Assuming the City's vacancy rate of 36 percent remains stable, the City's projected jobs/housing ratio would be approximately 3.3 by 2035 upon full development of permitted uses.

The Project would result in direct employment growth from the proposed mix of employment-generating land uses within the approximately 80-acre Town Center Planning Area, which would include up to 175,000 square feet of combined restaurant and entertainment destinations, shops, and multifamily projects; up to 400 hotel rooms; and up to 731 residential dwelling units, including 230 branded resort units. As indicated in **Table 5.12-4: Specific Plan Employment Opportunities**, it is projected the uses that would be permitted by the Project would provide up to 1,038 employment opportunities. The existing

21 City of Rancho Mirage, "Community Overview," accessed April 2019, available at <https://www.ranchoirageca.gov/community-overview/>.

22 City of Rancho Mirage, *General Plan*, Chapter 11: Economic and Fiscal, adopted November 16, 2017.

23 California Department of Finance, Demographic Research Unit, *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2018 with 2010 Census Benchmark*, "Table 2: E-5 City/County Population and Housing Estimate, 1/1/2018," May 1, 2018, accessed April 2019, available at <http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/>.

24 City of Rancho Mirage, *General Plan*, Chapter 2: Land Use, Table 3: Potential Employees Based on Estimated Future Commercial Development, 14, adopted November 16, 2017.

25 US Environmental Protection Agency, *EnviroAtlas*, "Employment to Housing Ratio," accessed April 2019, <https://enviroatlas.epa.gov/enviroatlas/DataFactSheets/pdf/Supplemental/EmploymentHousingRatio.pdf>.

26 City of Rancho Mirage, *General Plan*, Chapter 2: Land Use, Table 3: Potential Employees Based on Estimated Future Commercial Development, 14, adopted November 16, 2017.

City jobs/housing ratio is approximately 1.35, with the projected jobs/housing ratio to be 3.3 by 2035. When the Project's estimated 1,038 jobs are added to 12,444 existing jobs, and the Project's 1,932 proposed households (taking into account anticipated vacancies) added to 9,224 currently occupied households, the jobs/housing ratio in the City with the Project would be approximately 1.29.²⁷ As mentioned previously, a jobs/housing ratio between 0.75 and 1.5 is considered beneficial for a jurisdiction. With implementation of the Project, the City's resulting jobs/housing ratio would continue to be within this desired range.

Table 5.12-4
Specific Plan Employment Opportunities

Building Type	Building Unit	Employee Generation Rate	Employment
Mixed Use Core / Town Center			
Commercial	175,000 sq. ft.	1 per 500 sq. ft.	350
Branded Resort Hotel	175 4-star rooms, 225 5-star rooms	1.5 per 4.5-star room, 2 per 5-star room	688
Total			1,038

Sources: County of Riverside Environmental Impact Report No. 521, Public Review Draft, March 2014, Table 4.1-D; hotel employee estimates provided by Pacific Hotels.

Abbreviations: du = dwelling units; sq. ft. = square feet

While there is the potential for the Project to generate employment to fulfill demand, the Project is not a unique use to draw substantial new residents to the area to fulfill the jobs. Rather, the primarily commercial-related, service-sector jobs which would be generated by the Project could be filled by workers already residing within the City or the Coachella Valley region. The Project's estimated number of generated jobs would be consistent with the total employment growth projected in the City in future years (approximately 4 percent of the projected increase in employment in the City at buildout in 2035 and approximately 24 percent of SCAG's forecasted increase in employment in the City between 2020 and 2040). Employment growth resulting from implementation of the Plan would result in a less than significant impact because this increase is consistent with projected employment growth for the City.

5. Cumulative Impacts

Implementation of the Project, in combination with other development projects in the unincorporated County areas, adjacent jurisdictions, and the City in accordance with the adopted General Plan, would contribute to future population, housing, and employment growth within the area. While the Project

²⁷ 1,932 du x 0.64 = 1,236 du.; 13,482 jobs / 10,480 du = 1.29

would contribute to the growth of the County, the Coachella Valley, and the City, any population, housing, and employment growth as a result of the Project is consistent with increases anticipated by the City's General Plan and regional growth forecasts. Additionally, the Project's cumulative housing and population impact provides benefits for the jobs/housing ratio, regional housing goals that promote housing production, and General Plan Housing Element goals regarding the mixture of residential densities. As a result, the Project would not cause a significant adverse impact with respect to cumulative population and housing growth.

C. MITIGATION MEASURES

No mitigation measures are required.

D. LEVEL OF SIGNIFICANCE OF MITIGATION

No significant impacts have been identified and no mitigation measures are necessary.