

4.9 Transportation

This section evaluates the potential for impacts relating to transportation resulting from implementation of OC River Walk Project (project).

The analysis in this section is based in part on the Trip Generation Analysis for OC River Walk Project, Orange County, California prepared by LSA included in Appendix I, VMT Screening Memo, of this Draft Environmental Impact Report (EIR).

4.9.1 Environmental Setting

4.9.1.1 Regulatory Setting

This section describes the federal, state, and local regulatory framework adopted to address transportation.

Federal

Federal Transportation Improvement Program

The Federal Transportation Improvement Program (FTIP) is a federally mandated 4-year program of all surface transportation projects that will receive federal funding or are subject to a federally required action. The FTIP is a comprehensive listing of such transportation projects proposed over a six-year period. As the metropolitan planning organization (MPO) for the region, the Southern California Association of Governments (SCAG) is responsible for developing the FTIP for submittal to the California Department of Transportation (Caltrans) and the federal funding agencies.

The FTIP identifies specific funding sources and fund amounts for each project. It is prioritized to implement the region's overall strategy for providing mobility and improving the efficiency and safety of the transportation system, while supporting efforts to attain federal and state air quality standards for the region by reducing transportation related air pollution. Projects in the FTIP include highway improvements, transit, rail and bus facilities, high occupancy vehicle lanes, high occupancy toll lanes, signal synchronization, intersection improvements, freeway ramps, and non-motorized projects—bicycle and pedestrian.

The FTIP must include all federally funded transportation projects in the region, as well as all regionally significant transportation projects for which approval from federal funding agencies is required, regardless of funding source. Projects in the FTIP are consistent with SCAG's approved Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

State

Statewide Transportation Improvement Program

Caltrans oversees the state's highway system. Caltrans is the public agency responsible for designing, building, operating, and maintaining the state's highway system, which consists of

freeways, highways, expressways, toll roads, and state Right-of-Way (the area between the roadways and property lines). Caltrans is also responsible for permitting and regulating the use of state roadways. Caltrans' construction practices require temporary traffic control planning during activities that interfere with the normal function of a roadway.

The California 2022 State Transportation Improvement Program (STIP), adopted by the California Transportation Commission on March 16, 2022, is a multi-year, statewide, intermodal program of transportation projects that is consistent with the statewide transportation plan and planning processes, metropolitan plans, and Code of Federal Regulations (CFR) Title 23. The STIP is prepared by Caltrans in cooperation with the MPOs and the regional transportation planning agencies. The STIP contains all capital and non-capital transportation projects or identified phases of transportation projects for funding under the Federal Transit Act and CFR Title 23, including federally funded projects. The STIP is the biennial five-year plan.

Congestion Management Program

State Proposition 111, passed by voters in 1990, established a requirement that urbanized areas prepare and regularly update a Congestion Management Program (CMP). The purpose of a CMP is to monitor the performance of the region's transportation system, develop programs to address near-term and long-term congestion, and better integrate transportation and land use planning. A CMP has been prepared for Orange County.

Senate Bill 375: Sustainable Communities and Climate Protection Act

Senate Bill (SB) 375 (2008) is intended to reduce greenhouse gas emissions from passenger vehicles through an integrated approach to regional transportation and land use planning. There is a strong link between land use, housing location decisions, and strategies to reduce emissions from the transportation sector. Within urbanized areas, residential development accounts for the largest share of land area, constituting a major influence on regional development footprints and travel patterns. As such, integrating transportation and residential land use is one of the most impactful strategies for reducing greenhouse gas emissions, as well as other forms of air pollution, for the transportation system. Governmental actions supporting the location, variety, and availability of housing are critical to implementing greenhouse gas emissions reduction policies. This can support the integration of transportation and housing development, offering more varied and efficient consumer choices. Infill development patterns that emphasize proximity and connectivity to public transit, walkable areas, employment and service centers and amenities can increase the effectiveness of these relationships.

Senate Bill 743

Senate Bill (SB) 743, signed by Governor Jerry Brown on September 27, 2013, created a process to change the way transportation impacts are analyzed under the California Environmental Quality Act (CEQA). SB 743 required the Governor's Office of Planning and Research (OPR) (renamed

to the Governor's Office of Land Use and Climate Innovation [LIC] as of July 1, 2024) to amend the CEQA Guidelines to provide an alternative to level of service for evaluating transportation impacts. Aside from changes to transportation analyses, SB 743 also includes several important changes to CEQA that apply to transit-oriented developments, including aesthetics and parking.

On December 2018, the California Natural Resources Agency certified and adopted the update to the CEQA Guidelines, implementing SB 743 (Section 15064.3). Under the OPR's revisions to the CEQA Guidelines, vehicle miles traveled (VMT) exceeding an applicable threshold of significance may indicate a significant transportation impact. Under the VMT standard, projects within 0.25 mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should generally be presumed to cause a less than significant transportation impact. Furthermore, under the CEQA Guidelines revisions, for projects other than roadway capacity projects, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, should not be considered a significant effect on the environment. The revisions to the CEQA Guidelines allow a lead agency to elect to evaluate transportation impacts under the revised CEQA Guidelines at any time and made the revised CEQA Guidelines applicable statewide beginning July 1, 2020.

California Department of Transportation Standards

The California Department of Transportation (Caltrans) is responsible for planning, designing, building, operating, and maintaining California's transportation system. Caltrans sets standards, policies, and Strategic Plans that aim to (1) provide the safest transportation system for users and workers, (2) maximize transportation system performance and accessibility, (3) efficiently deliver quality transportation projects and services, (4) preserve and enhance California's resources and assets, and (5) promote quality service. Caltrans has the discretionary authority to issue special permits for the use of state highways for other than normal transportation purposes. Caltrans also reviews all requests from utility companies, developers, volunteers, nonprofit organizations, and others desiring to conduct various activities within the state highway right-of-way. The Caltrans Highway Design Manual, prepared by the Office of Geometric Design Standards (7th edition, updated 2020), establishes uniform policies and procedures to carry out the highway design functions of Caltrans. Caltrans also prepared the Vehicle Miles Traveled-Focused Traffic Impact Study Guide (Caltrans 2020), which replaced the Guide for the Preparation of Traffic Impact Studies intended for use by the Caltrans Local Development-Intergovernmental Review program, lead agencies, tribal governments, developers, and consultants when reviewing or analyzing land use projects or plans that may impact or affect the State Highway System.

Regional

Regional Transportation Plan/Sustainable Communities Strategies

SCAG is responsible for most regional planning in Southern California. SCAG represents a six-county region that includes Orange, Imperial, Los Angeles, Riverside, San Bernardino, and Ventura counties and 189 cities. Cities of Anaheim and Orange are part of the Orange County Council of Governments, which is a sub-region of the SCAG planning area. On April 4, 2024, SCAG’s Regional Council adopted 2024–2050 RTP/SCS or Connect SoCal Plan. On May 10, 2024, the Federal Highway Administration and Federal Transit Administration approved Connect SoCal 2024; however, as of February 2025, CARB’s approval is still pending before it is fully certified. The 2024–2050 RTP/SCS, or Connect SoCal Plan, is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The 2024–2050 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with SB 375, improve public health, and meet the National Ambient Air Quality Standards. This long-range plan, required by the State of California and the federal government, is updated by SCAG every 4 years as demographic, economic, and policy circumstances change. The RTP/SCS is a living, evolving blueprint for the region’s future.

Of the goals presented in Connect SoCal 2024, the following goals related to transportation are applicable to the project:

- **Goal 2:** Improve mobility, accessibility, reliability, and travel safety for people and goods.
- **Goal 3:** Enhance the preservation, security, and resilience of the regional transportation system.
- **Goal 4:** Increase person and goods movement and travel choices within the transportation system.
- **Goal 7:** Adapt to a changing climate and support an integrated regional development pattern and transportation network.
- **Goal 9:** Encourage development of diverse housing types in areas that are supported by multiple transportation options.

Local

City of Anaheim General Plan

The current City of Anaheim General Plan Circulation Element was adopted May 2004 and provides the description of the City’s transportation system. Its main purpose is to design and improve a circulation system to meet the current and future needs of Anaheim residents, businesses, and visitors. The following 2004 General Plan Circulation Element goals and policies are applicable to the project.

Circulation Element

- **Goal 1.1:** Provide a comprehensive multimodal transportation system that facilitates current and long-term circulation of people and goods in and through the City.
 - **Policy 1.1-2.** Provide enhanced access to destinations through the use of Intelligent Transportation Systems and by enabling modal choices.
 - **Policy 1.1-6.** Ensure the provision of needed transportation improvements through the site plan and environmental review process.
 - **Policy 1.1-7.** Enable modal choice to improve mobility as an alternative to roadway expansions or additions.
- **Goal 2.3:** Improve regional access for City residents and workers.
 - **Policy 2.3-4.** Participate in cooperative planning processes to promote effective regional transportation and sustainable development and ensure that citizens of Southern California can access jobs, housing and tourism destinations in Anaheim.
 - **Policy 2.3-5.** Coordinate with neighboring jurisdictions and regional, State, and Federal agencies to implement Smartstreets, Intelligent Transportation Systems, High Speed Rail, Bus Rapid Transit and ARTIC.
- **Goal 3.1:** Provide a well-maintained street system.
 - **Policy 3.1-2.** Maintain and rehabilitate all components of the circulation system, including roadways, sidewalks, bicycle facilities, pedestrian facilities, Intelligent Transportation systems and traffic signals.
 - **Policy 3.1-5.** Implement bicycle routes, priority signaling and bicycle amenities whenever roadways are improved.
 - **Policy 3.1-6.** Give additional maintenance priority to streets with bike lanes or bike routes.
- **Goal 7.1:** Protect and encourage bicycle travel.
 - **Policy 7.1-1.** Provide safe, direct, and continuous bicycle routes for commuter and recreational cyclists.
 - **Policy 7.1-2.** Incorporate bicycle planning into the traditional transportation and roadway maintenance planning process.
 - **Policy 7.1-3.** Support and implement bicycle routes that minimize cyclist/motorist conflicts.
 - **Policy 7.1-4.** Support roadway design policies that promote attractive circulation corridors and safe and pleasant traveling experiences for bicyclists.
 - **Policy 7.1-6.** Implement a bikeway system with linkages to routes in neighboring jurisdictions and regional bicycle routes.

- **Policy 7.1-7.** Maximize the use of easements and public rights-of-way along flood channels, utility corridors, rail lines and streets for bicycle and pedestrian paths.
- **Policy 7.1-11.** Work with the Caltrans to provide appropriate accommodation for bicyclists and pedestrians along Caltrans facilities, as well as applying for funding for state, local and regional non-motorized modal projects.
- **Goal 8.1:** Protect and encourage pedestrian travel.
 - **Policy 8.1-1.** Encourage and improve pedestrian facilities that link development to the circulation network and that serve as a transition between other modes of travel.
 - **Policy 8.1-2.** Improve pedestrian and bicycle connections from residential neighborhoods to retail activity centers, employment centers, schools, parks, open space areas and community centers.
 - **Policy 8.1-6.** When appropriate, walkways should include pedestrian amenities such as shade trees and/or plantings, trash bins, benches, shelters, and directional kiosks.
 - **Policy 8.1-7.** Ensure that streets and intersections are designed to provide visibility and safety for pedestrians.
 - **Policy 8.1-8.** Improve pedestrian amenities adjacent to Metrolink and Amtrak stations.
 - **Policy 8.1-9.** Enhance and encourage pedestrian amenities and recreation, retail and employment opportunities in mixed-use areas to enhance non-motorized transportation.
 - **Policy 8.1-11.** Coordinate with appropriate agencies to ensure that transit stops are accessible to pedestrians.

Bicycle Master Plan

The City’s Bicycle Master Plan was adopted by the City in 2017 and amended in 2020, and is a policy document that guides the City in its implementation of citywide bicycle facilities. It is intended to improve bicycling safety, comfort, and accessibility and it identifies a network of existing and proposed bicycle facilities focusing on connecting existing routes, linking to parks, employment centers, and transportation hubs without reducing vehicle lanes. (Anaheim 2020). The Bicycle Master Plan is currently being updated as part of the City’s General Plan Focused Update.

City of Orange

The City of Orange General Plan Circulation & Mobility Element was adopted in March 2010 and was last amended in 2015. The following General Plan Circulation & Mobility Element goals and policies are applicable to the project.

- **Goal 1.0:** Provide a safe, efficient, and comprehensive circulation system that serves local needs, meets forecasted demands, and sustains quality of life in neighborhoods.
 - **Policy 1.1:** Plan, build, and maintain an integrated, hierarchical, and multi-modal system of roadways, pedestrian walkways, and bicycle paths throughout the City.
 - **Policy 1.3:** Consider various methods to increase safety on City arterials and neighborhood streets, including landscaping, provision of bike/transit lanes, and consideration of traffic calming on neighborhood streets in accordance with the City’s Neighborhood Residential Traffic Management Program.
 - **Policy 1.4:** Prohibit on-street parking where possible to reduce bicycle/automobile conflicts in appropriate target areas as recommended by the Bikeways Master Plan.
- **Goal 2.0:** Provide an effective regional transportation network.
 - **Policy 2.1:** Ensure consistency with the County MPAH in order to qualify for funding programs.
 - **Policy 2.6:** Encourage the use of regional rail, transit, bicycling, carpools, and vanpools for work trips to relieve traffic congestion.
- **Goal 4.0:** Provide efficient and accessible modes of pedestrian, bicycle, and equestrian transportation and improved facilities and amenities.
 - **Policy 4.1:** Create a comprehensive bicycle network that is integrated with other transportation systems by establishing complementary on-street and offstreet facilities as identified in the City of Orange Bikeways Master Plan and OCTA Commuter Bikeways Strategic Plan, including Santiago Creek, the Santa Ana River, and the Tustin Branch Trail.

4.9.1.2 Existing Conditions

Roadway System

Regional access to the project site is provided by State Route 57, which crosses the Santa Ana River. The project site includes the existing State Route 57 underpass. There is no direct vehicular access to the project site other than the existing access for maintenance vehicles.

The future River Road, part of the approved OCVIBE project (by others), is planned along the west side of the Santa Ana River, extending from Katella Avenue to the future Cerritos Avenue (a private road) adjacent to the Union Pacific Railroad. According to the City of Anaheim Circulation Element, River Road is designated as a Primary Arterial between Katella Avenue and Ball Road, including Phoenix Club Drive south of Ball Road, which will be renamed River Road as part of the OCVIBE project implementation.

Bike and Pedestrian Roadway System

City of Anaheim

The City of Anaheim's active transportation facilities include bikeways that are generally categorized into four types, as described below.

Class I Bikeway (Bike Path). Also known as a shared path or multi-use path, a bike path is a paved right-of-way for bicycle travel that is separate from any street or highway (e.g., along a creek or channel).

Class II Bikeway (Bike Lane). A striped and stenciled lane for one-way bicycle travel on a street or highway. This facility could include a buffered space between the bike lane and vehicle lane (referred to as a buffered bike lane) and the bike lane could be adjacent to on-street parking.

Class III Bikeway (Bike Route). A signed route along a street where the bicyclist shares the right-of-way with motor vehicles. This facility can also be augmented using shared-lane markings (also known as sharrows). An enhanced bike route, known as a bicycle boulevard, can include traffic calming treatments to slow down vehicles.

Class IV Bikeway (Separated Bike Lane). Also known as a cycle track or a protected bike lane, this is a bikeway for the exclusive use of bicycles including a separation between the bikeway and the through vehicular traffic. The separation may include, but is not limited to, grade separation, flexible posts, inflexible physical barriers, or on-street parking. A cycle track can be one-way or two-way.

City of Orange

The Orange Bikeway Master Plan has established three classes of bicycle routes that adhere to California Department of Transportation (Caltrans) standards:

- Class I Off-road bike paths are located on vacated rail lines, water corridors, or areas otherwise separated from streets.
- Class II On-road bike lanes are located along arterial roadways that are delineated by painted stripes and other features.
- Class III On-road bike routes share use with motor vehicle traffic. They provide a route that is signed but not striped.

Project Site

The project site includes the existing Santa Ana River Trail (SART), as shown on Figure 2-5, Existing Condition – Surface. SART is a Class I Bikeway (Bike Path) and a regional bike path that extends across Orange, Riverside, and San Bernardino Counties along the Santa Ana River. The City of Anaheim's Circulation Element and the City of Orange Circulation and Mobility Element identify the SART as a Class I Bikeway.

On the western side, SART can be accessed from Katella Avenue, Orangewood Avenue, the Anaheim Regional Transportation Intermodal Center (ARTIC) near the southern border, and the north parking lot. On the eastern side, SART is accessed from Katella Avenue. A Class IV Bikeway (separated bike lane) is proposed along River Road (future), which would run along the Santa Ana River between Katella Avenue and the Union Pacific Railroad as part of the OCVIBE Project, connecting to the existing Anaheim Coves Trail. The Anaheim Coves Trail is a Class I Path that generally extends from Ball Road to La Palma Avenue.

Bridges

There are six existing bridges that span over the Santa Ana River on the project site. Orangewood Avenue, SR-57 Freeway, Metrolink/LOSSAN Corridor railroad, Katella Avenue, Union Pacific Railroad, and Ball Road bridges.

Transit Facilities

The project site is near a network of bus and rail transit services. The Orange County Transportation Authority (OCTA) provides regular bus service along Katella Avenue and Ball Road. The ARTIC, located adjacent to the project site within the OCVIBE boundaries, provides access to existing bus, Amtrak, and Metrolink services, as well as a link to the proposed California High-Speed Rail system.

Vehicle Level of Service Guidelines.

Criteria for Preparation of Traffic Impact Studies states that a traffic impact analysis would be needed for a project that would generate 100 or more AM or PM peak-hour trips, would contribute 51 or more peak-hour trips to any CMP monitored intersection, would generate 1,600 daily trips if located on the CMP highway system, or would generate 2,400 daily trips if adjacent to the CMP highway system. The Orange County CMP highway system includes Katella Avenue and the Katella Avenue interchanges with State Route 57 in the vicinity of the project.

The City of Orange Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment also suggests that level of service analysis would be required if a project generates more than 100 AM or PM peak-hour trips or adds 51 or more trips during the AM or PM peak hours to any single intersection.

The County of Orange Transportation Implementation Manual states that open space, passive park, and park buildings are deemed to have significant public benefit and exempt from preparing level of service analysis.

Trip Generation

The Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition, provides data on the trip generation characteristics of different types of land uses. The project has the potential to generate recreation trips similar to other public parks. While only a small portion of the study area is outside the riverbed, Table 4.9-1, Trip Generation, calculates project trips based on the entire 90-acre study area. As shown in Table 4.9-1, the project is anticipated to generate 70 daily trips on a typical day of which 2 trips would occur in the AM peak hour and 10 trips would occur in the PM peak hour. This is below the cities of Anaheim and Orange’s established threshold of 100 peak-hour trips (51 peak-hour trips at a CMP intersection) that would require preparation of a detailed traffic analysis.

Table 4.9-1. Trip Generation

Land Use	Unit	ADT	In	Out	Total	In	Out	Total
Trip Rates								
Public Park	Acre	0.78	0.01	0.01	0.02	0.066	0.05	0.11
Trips								
OC River Walk	90 acres	70	1	1	2	5	5	10

4.9.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, the project would have a significant impact on transportation if it would:

- **Threshold T-1:** Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.
- **Threshold T-2:** Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).
- **Threshold T-3:** Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- **Threshold T-4:** Result in inadequate emergency access.

The Initial Study, found in Appendix A to the Draft EIR, determined that the following thresholds would have less than significant or no impact, and these environmental topics will not be addressed further in this section of the Draft EIR:

- Threshold T-1
- Threshold T-3
- Threshold T-4

4.9.3 Plans, Programs, and Policies

This section addresses plans, programs, and policies relevant to the project.

PPP T-1 The Santa Ana River Trail will be constructed in compliance with the State Coastal Conservancy's Santa Ana River Parkway & Open Space Plan dated March 14, 2018, or any updates thereof, including trail design principles and guidelines, the California Transportation Department Highway Design Manual's Bikeway Design Criteria, and the design standards of the City of Anaheim, the City of Orange, or other appropriate design standards as required by the applicable approval authority.

PPP GEO-3 All bridges shall be designed and constructed in accordance with the latest edition of the American Association of State Highway and Transportation Officials Load and Resistance Factor Design Bridge Design Specifications with California Amendments, the latest versions of the California Department of Transportation Standard Plans, Seismic Design Criteria, and Geotechnical Manual, as required for various elements of the project, as determined by the applicable approval authority.

4.9.4 Environmental Impacts

The following sections address various potential impacts relating to transportation that could result from implementation of the project.

4.9.4.1 Threshold T-2: Induction of Substantial Vehicle Miles Traveled

Impact Analysis

On June 23, 2020, the City of Anaheim adopted the City of Anaheim Traffic Impact Analysis Guidelines for CEQA Analysis (City of Anaheim 2020). These adopted guidelines include screening criteria for various project types that can be screened from project-level assessment as they are presumed to have a less than significant impact. The examples of projects that could be screened include “pocket, neighborhood and community parks” (Type 3 project screening). Projects generating less than 110 daily trips are also presumed to have a less than significant impact.

The City of Orange Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment also identifies local parks and projects generating fewer than 110 daily vehicle trips as having a presumption of a less than significant impact.

The County of Orange Transportation Implementation Manual states that public facilities that support community health, safety, or welfare are screened from subsequent analysis of VMT. Small projects generating fewer than 500 daily vehicle trips are presumed to have a less than significant impact on VMT.

Simultaneous with clearance of the revised CEQA Guidelines, the OPR released the Technical Advisory for Evaluating Transportation Impacts under CEQA (OPR 2018). Although this document does not carry the weight of law, it does provide clarification of CEQA Guidelines, Section 15064.3, and guidance that could be adopted by jurisdictions. The Technical Advisory for Evaluating Transportation Impacts under CEQA states that the addition of Class I bike paths, trails, multi-use paths, or other off-road facilities that serve non-motorized travel would not likely lead to a substantial or measurable increase in vehicle travel.

The project elements accessible to the public would be pedestrian/bike bridges, trails, parks, and various recreational amenities serving visitors and the local population. The project would construct new Class I bike path connections bridging the Santa Ana River. Other project elements support community health and safety through water quality improvements.

As shown in Table 4.9-1, the project meets the descriptions provided in the City of Anaheim Guidelines, the City of Orange guidelines, and the County of Orange guidelines for project types presumed to have a less than significant transportation impact under CEQA. Additionally, the project includes Class I bike path improvements and multi-use paths that serve non-motorized travel, not leading to a substantial or measurable increase in vehicle travel. Therefore, no additional VMT analysis is necessary, and the project VMT impacts are presumed to have a less than significant impact.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measure: No mitigation measures are required.

4.9.5 Cumulative Impacts

4.9.5.1 Cumulative Threshold T-2: Induction of Substantial Vehicle Miles Traveled

For cumulative conditions, if a project is consistent with the regional RTP/SCS, its cumulative impacts are considered less than significant, subject to other substantial evidence.

As discussed in Threshold T-2, the project would have a less than significant individual VMT impact. Other development projects in Anaheim and Orange that do not meet their respective screening criteria must be analyzed for VMT impacts and mitigated to the extent feasible. Additionally, development in these cities is expected to align with long-term VMT reduction goals outlined in their General Plans and the regional RTP/SCS. Although development of cumulative projects based on the full buildout under the General Plans would likely result in significant VMT impacts.

Therefore, the project would have a less than significant individual VMT impact. The project would have a beneficial impact on VMT, and would not result in a significant cumulative VMT impact.

4.9.6 Level of Significance Before Mitigation

The following thresholds would be less than significant:

- **Threshold T-2:** Implementation of the project would not Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

4.9.7 Mitigation Measures

No mitigation measures are required.

4.9.8 Level of Significance After Mitigation

Not applicable.

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