

## EXECUTIVE SUMMARY

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The California State Lands Commission (CSLC or Commission) has prepared this Supplemental Environmental Impact Report (SEIR) in accordance with the California Environmental Quality Act (CEQA; Pub. Res. Code §21000 et seq.) and its implementing regulations, the CEQA Guidelines (14 Cal. Code Regs. §15000 et seq.). The Commission holds title to and manages tidelands and submerged lands and beds of navigable waterways for the benefit of all people of the State for statewide Public Trust purposes, which include waterborne commerce, navigation, fisheries, water-related recreation, habitat preservation, and open space. The Commission may grant leases on these State lands for such purposes as, but not limited to, ports, marinas, docks and wharves, and dredging.

Two marine aggregate companies, Martin Marietta Marine Operations, LLC (Martin Marietta) and Lind Marine Inc. (Lind), or their predecessors in interest, have held leases issued by the Commission to harvest sand commercially (sand mining) within San Francisco Bay and the western Delta for more than 80 years. Martin Marietta and Lind are referred to collectively in this SEIR as the Lessees or Applicants. Following the Commission's certification of the San Francisco Bay and Delta Sand Mining Project Environmental Impact Report (State Clearinghouse No. 2007072036) on October 12, 2012 (2012 EIR), the CSLC authorized two leases for the Applicants to conduct sand mining in the Central San Francisco Bay and Suisun Bay in 2012 and 2013, respectively. The leases are provided in Appendix A. The Central Bay leases were reapproved by the Commission in 2016 based on analysis documented in the 2012 EIR.

### ES.1 PROJECT OVERVIEW AND LOCATIONS

#### ES.1.1 Overview of the Revised Project

The Applicants applied to the CSLC to authorize continued commercial mining of sand for 10 additional years from the date of lease issuance at reduced maximum annual and total sand mining volumes over the proposed lease term (Revised Project) relative to the maximum annual and total volumes previously evaluated under the 2012 EIR for the term of the prior Leases. More specifically, the Revised Project proposes a reduction in the authorized annual materials extraction volume in four out of the six existing lease areas (inclusive of the private Middle Ground lease): the authorized lease volume would be reduced by 289,866 cubic yards per year [cy] from 2,039,866 cy to 1,750,000 cy. The proposed authorized volumes in two Central Bay leases would remain unchanged. Further, the Applicants currently use five of the nine offloading

facilities described and examined in the 2012 EIR.<sup>1</sup> For purposes of analysis, this SEIR for the Revised Project addresses continued use of the Petaluma, Mare Island, Collinsville, Pier 92, and Tidewater offloading facilities. The issuance of new Leases for the Revised Project would require discretionary action by the Commission and compliance with CEQA.

### **ES.1.2 Locations**

The 2012 EIR describes the sand mining lease area boundaries and the parcel numbers that comprise the existing Leases in Part III, Section 2.2.2 (2012 EIR, p. 2-2) and Part III, Section 2.3.1 (2012 EIR, p. 2-7 et seq.). No change is proposed to the existing lease area boundaries, which are shown in Figures ES-1 and ES-2.

Briefly, the Applicants currently are conducting sand mining in six lease areas in the Central San Francisco Bay (Central Bay) and in the Suisun Bay<sup>2</sup> area of the western Sacramento-San Joaquin Delta (Delta). The Central Bay leases constitute 2,601-acres and consist of nine parcels of submerged lands within four leases currently issued by the Commission (Figure ES-1). The Suisun Bay lease area totals 938 acres and consists of two parcels of submerged lands within a single Commission-issued lease (Figure ES-2). In addition to the Commission-issued Leases, a third, privately-owned lease area (not under the jurisdiction of the Commission) authorizes sand mining in the Middle Ground Shoal of Suisun Bay (Figure ES-2). Although outside of Commission jurisdiction, the 2012 EIR and this SEIR also consider the potential impacts of sand mining within the private Middle Ground Shoal lease area.

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<sup>1</sup> The use of particular offloading sites does not require Commission authorization, but are included in the scope of the SEIR analysis consistent with the 2012 EIR.

<sup>2</sup> Suisun Bay is the easternmost of the four main basins that make up San Francisco Bay.

Figure ES-1. Central SF Bay Lease Areas

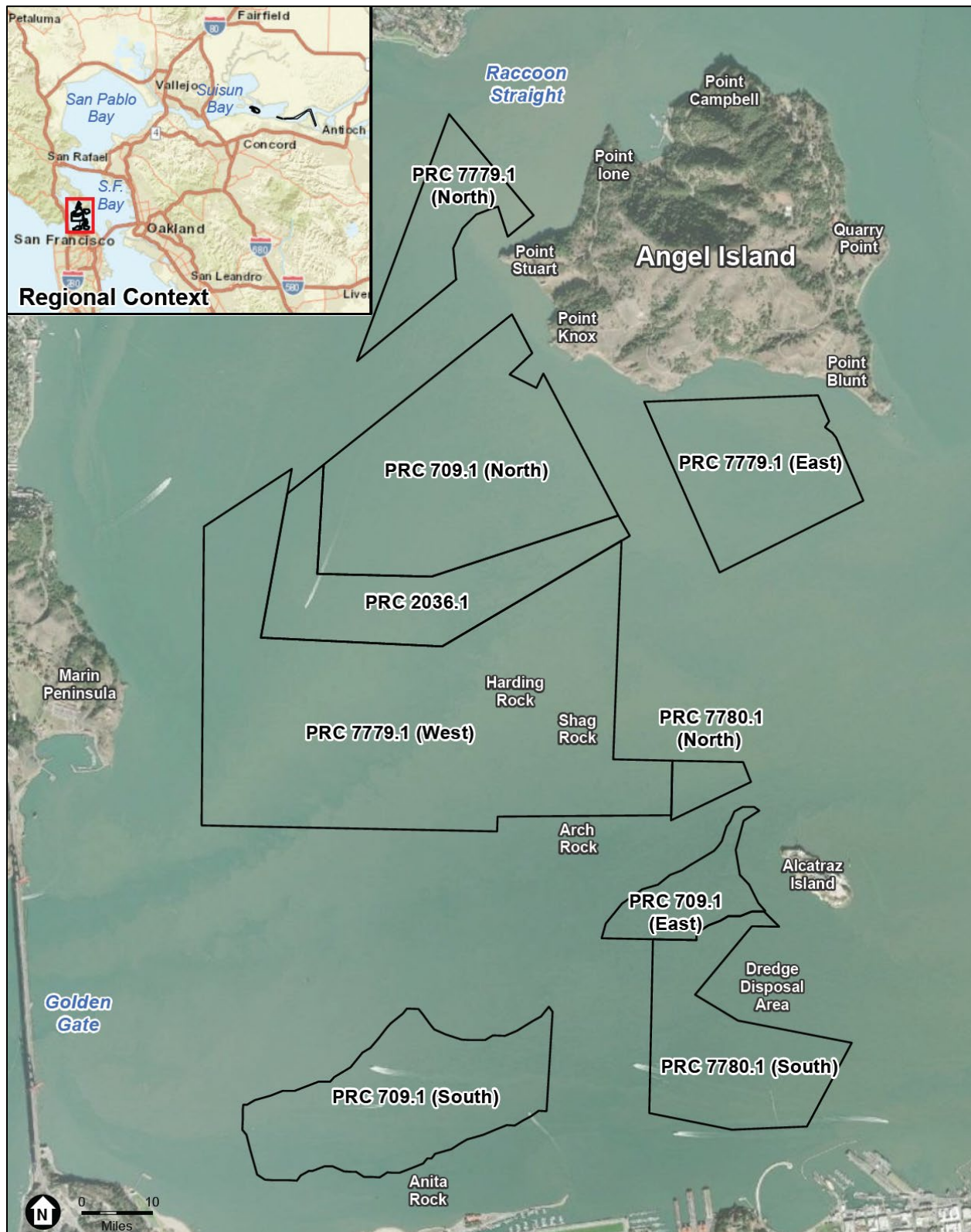
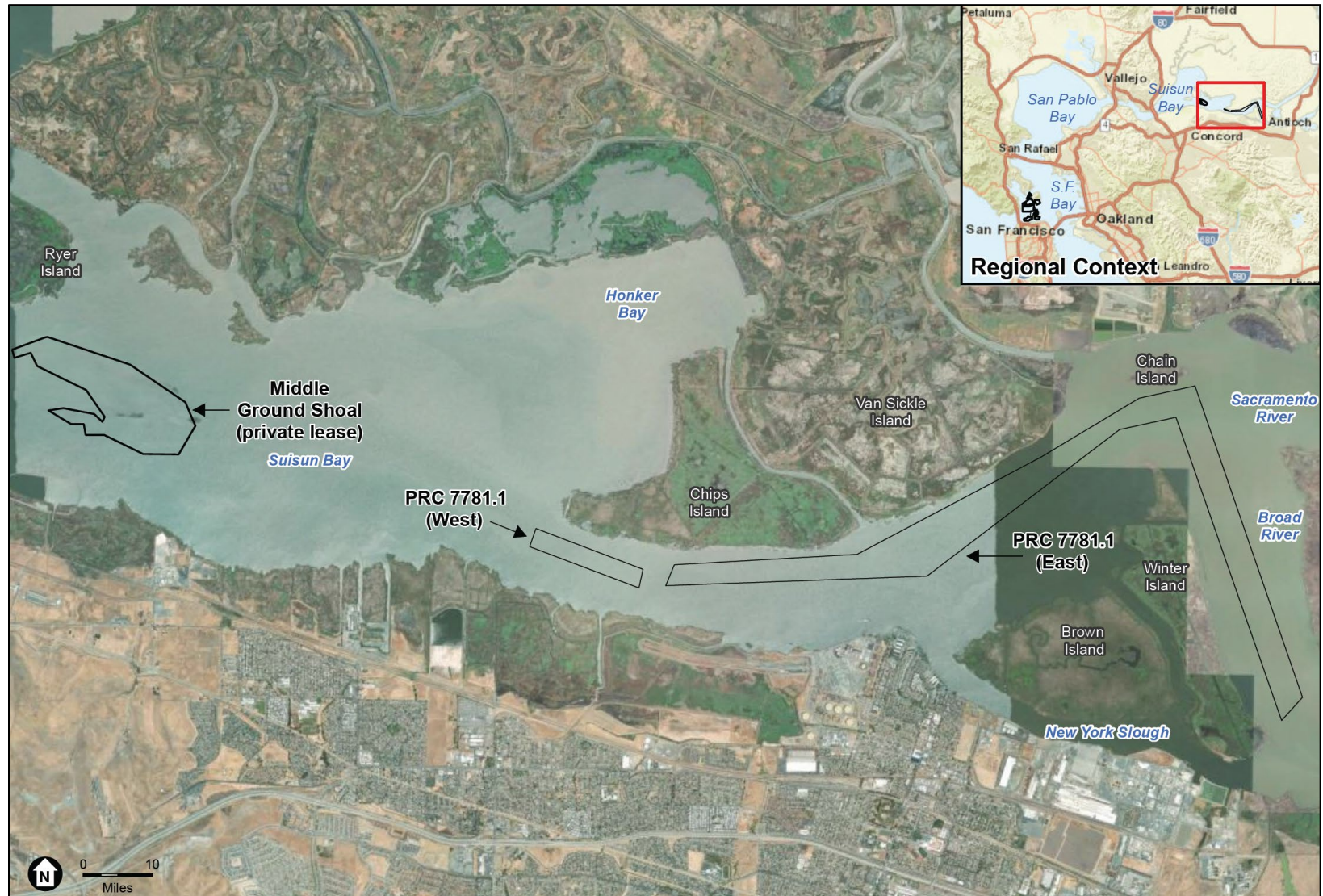




Figure ES-2. Suisun Bay Lease Areas



Source: ESA, 2022

## **ES.2 PURPOSE, FOCUS, AND USE OF THIS SEIR**

### **ES.2.1 Purpose of this SEIR**

An EIR (like the 2012 EIR) is an informational document intended to inform public agency decision makers and members of the public of the potential significant environmental effects of a project, identify possible ways to minimize those effects, and describe reasonable alternatives to the project (14 Cal. Code Regs. §15121). The purpose of a supplemental EIR (like this SEIR) is to document the minor additions or changes necessary to make an original EIR adequate for a revised project, and it only needs to contain the information necessary to meet that purpose. A supplemental EIR augments the previous EIR to address a limited set of issues, and the two must be considered together when the lead agency determines whether to issue a further approval for the project (14 Cal. Code Regs. §15163).

The Revised Project, as proposed, is a modification of the project analyzed in the 2012 EIR (2012 Project), namely the continuation of the San Francisco Bay and Delta Sand Mining Project for an additional 10-year lease term at reduced total and annual permitted extraction volumes with the delivery of mined sand to fewer offloading sites than analyzed in the 2012 EIR. Because new scientific information (i.e., the technical studies identified in Section 1.2.3 of this SEIR), was developed subsequent to the 2012 EIR and could affect the previous analysis, the Revised Project is analyzed in light of that new information. Because only minor changes are necessary to make the 2012 EIR apply to the Revised Project, the Commission is preparing an SEIR.

The information in this SEIR supplements, and incorporates by reference, information from the following documents:

- The 2012 EIR certified by the Commission on October 19, 2012
- Findings of the Commission as a CEQA lead agency pursuant to CEQA Guidelines section 15091 (Item 101, October 19, 2012)
- Leases PRC 709.1, PRC 2036.1, PRC 7779.1, and PRC 7780.1, approved by the Commission on October 19, 2012
- Lease PRC 7781.1, approved by the Commission February 22, 2013 (Item C42, February 22, 2013)

- The 2016 re-approval of the 2012 EIR, certified by the Commission on June 28, 2016 (Item C33, June 28, 2016)<sup>3</sup>

## **ES.2.2 Focus of this SEIR**

This SEIR documents and analyzes the changes between the San Francisco Bay and Delta Sand Mining Project analyzed in the 2012 EIR and the proposed Revised Project. While, arguably, the Commission may rely on the 2012 EIR in considering whether to approve the Revised Project, the development of new technical studies (listed in Section 1.2.3) of potentially substantial importance has been identified by CSLC as rendering an SEIR appropriate under Sections 15162 and 15163 of the CEQA Guidelines.

This SEIR focuses on two areas:

- 1) Proposed changes to the project described and analyzed in the 2012 EIR, consisting of:
  - i) the proposed issuance of new Leases for a 10-year period;
  - ii) the proposed reduction in the authorized annual materials extraction volume in four of the six lease areas from 2,039,866 cy to 1,750,000 cy; and
  - iii) continued use of current material offloading facilities, which are a subset of sites identified in the 2012 EIR.
- 2) A consideration of monitoring and technical studies conducted since certification of the 2012 EIR to assess whether they contain new information of substantial importance for purposes of CEQA.

The SEIR assesses the Revised Project as modified from the project described in the 2012 EIR and informed by the new technical studies. Because the Revised Project is substantially a continuation of the activities described in the 2012 EIR, the impact analysis of many of the resource areas addressed in the 2012 EIR is

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<sup>3</sup> In November 2015, the First District Court of Appeal upheld the 2012 EIR pursuant to CEQA, finding that the Commission's analyses of Project impacts were supported by substantial evidence. The Court held that the Commission had not adequately considered its obligations under the common law Public Trust Doctrine and remanded the case to the trial court. In June 2016, the Commission prepared a public trust analysis and reapproved the Central Bay leases in compliance with the Court's ruling, which was upheld by the Court on October 31, 2018. The information and impacts analyses presented in the 2012 EIR for purposes of complying with CEQA remain relevant to the current analysis.

unchanged. As analyzed in SEIR Section 3, Project Impacts and Mitigation Measures, the SEIR focuses on the following resource areas: Air Quality and Greenhouse Gas Emissions, Biological Resources, Cultural and Tribal Cultural Resources, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Recreation, and Mineral Resources. The consistency analysis documented in SEIR Section 3.9 determined that the Revised Project would otherwise not affect the conclusions reached in the 2012 EIR.

### **ES.2.3 Use of this SEIR**

As described in the 2012 EIR, Part III, Section 1.3, sand mining in the Bay and Delta is a highly regulated activity. This SEIR is intended to provide the Commission and each responsible and trustee agency with the information required to exercise its jurisdictional responsibilities with respect to the Revised Project, which would be considered at a noticed public meeting of the Commission. The SEIR will be used by the Commission to determine whether to approve the application and grant new 10-year leases of California sovereign lands to the Applicants for the purpose of mining sand.

The SEIR is also intended to provide information needed by other State and local agencies with jurisdiction to exercise their responsibilities in issuing discretionary permits associated with the Revised Project. To continue mining sand from the lease parcels and privately owned Middle Ground shoals site, the Applicants require discretionary approvals from the responsible agencies listed in SEIR Section 1.4, Project Permits and Approvals.

### **ES.3 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

In this SEIR, the terms “effect” and “impact” are synonymous and can refer to effects that are either adverse or beneficial.

- **Direct effects** are caused by the Revised Project and occur at the same time and in the same place as the Revised Project.
- **Indirect effects** are caused by the Revised Project but occur later in time or further in distance, though still reasonably foreseeable.
- **Residual impacts** are impacts that still meet or exceed significance criteria after application of mitigation and therefore remain significant.
- **Cumulative impacts** are the changes in the environment resulting from the incremental impact of the Revised Project when added to other past,

present, and reasonably foreseeable probable future projects. To the extent that the effects of past projects are reflected in baseline conditions, this analysis does not double-count them. Future projects are “reasonably foreseeable” if they were either proposed or approved at the time development of this SEIR was initiated (see Table 3.1-2, Cumulative Projects List in Section 3.1.5 of this SEIR). Cumulative impacts could result from individually minor but collectively significant activities from projects that take place over time.

- **Short-term impacts** are those expected to occur during mining activities related to the Revised Project that do not have lingering effects for an extended period once active mining is complete.
- **Long-term impacts** are those that persist for an extended period after mining activities are completed.

As described in this Draft SEIR, Chapter 3, the Revised Project would rely on continued implementation of the project design features, best management practices, and mitigation measures to minimize environmental impacts. For the following resource areas, the Revised Project would cause no new significant impact and no substantial increase in the severity of a significant impact identified in the 2012 EIR:

- Biological Resources
- Hazards and Hazardous Materials
- Air Quality and Greenhouse Gas Emissions
- Cultural and Tribal Cultural Resources
- Land Use and Recreation

Consistent with the analysis in the 2012 EIR, the Revised Project would result in one significant unavoidable impact (Impact BIO-8) for purposes of CEQA.

## **ES.4 SUMMARY OF ALTERNATIVES**

### **ES.4.1 Project Purpose and Objectives**

CEQA and the CEQA Guidelines require a lead agency to analyze a reasonable range of alternatives to a proposed project that could feasibly attain most of the basic objectives of the project while substantially reducing or eliminating its



significant environmental effects. A project's statement of objectives describes the purpose of the project and the reasons for undertaking it. As explained in Section 2.2 of this SEIR, the purpose of the Revised Project, as stated by the Applicants, is to assure the availability of marine sands for commercial and public purposes within the greater San Francisco Bay area. The basic objective of the Revised Project is to continue to mine sand at an economically viable level over the next 10 years to make this mineral resource available for commercial and public use.

#### **ES.4.2 Alternatives Considered**

The following alternatives were evaluated in this SEIR:

- Revised Project
- No Project Alternative

See SEIR Section 4, Alternatives.

#### **ES.4.3 Environmentally Superior Alternative**

As explained in Section 6.6 of the 2012 EIR, CEQA Guidelines section 15126.6(d) requires an EIR to include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. Section 15126.6(e)(2) further states, in part, that *"If the environmentally superior alternative is the "No Project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives."*

SEIR Section 5.7 explains that the No Project Alternative would be the environmentally superior alternative because it would avoid all of the potential significant impacts of the Revised Project. Thereafter, consistent with the direction in CEQA Guidelines section 15126.6(e)(2) and based on the comparison of alternatives provided in Section 4 of this SEIR, Section 5.7 explains that the Commission preliminarily has identified the Revised Project as the environmentally superior alternative.

#### **ES.5 KNOWN AREAS OF CONTROVERSY**

CEQA Guidelines section 15123(b) requires an EIR to include a brief summary of areas of known controversy. Any of the environmental issues considered during public scoping or in this Draft SEIR could become an issue of controversy. Preliminarily, the Commission has identified areas of controversy as including the

issues and questions raised in comments received during the scoping process summarized in Section 1.2.5 of this SEIR. Scoping input received is provided in Appendix B and relates to: baseline conditions in the lease areas, potential impacts on cultural resources or tribal cultural resources; consistency with the San Francisco Bay Plan; hydrology and water quality, including sediment, bathymetry, morphology, and sand loss; biological resources, including aquatic and terrestrial species and habitat; and the Public Trust. Each of these areas of known controversy is being evaluated by the Commission as part of its consideration of potential significant impacts, mitigation measures, and alternatives and in the context of any decision whether to approve the Revised Project.

## **ES.6 ISSUES TO BE RESOLVED**

CEQA Guidelines section 15123(b) also requires an EIR to identify issues to be resolved, which include the choice among alternatives and whether or how to mitigate significant impacts. The following major issues are to be resolved:

- Determine whether the SEIR adequately describes the environmental impacts of the Revised Project.
- Choose among alternatives.
- Determine whether the recommended mitigation measures should be adopted or modified.
- Determine whether additional mitigation measures need to be applied to the Revised Project.

## **ES.7 ORGANIZATION OF THIS SEIR**

This SEIR presents information, including information required by CEQA (14 Cal. Code Regs. §15122-15131) and pursuant to the Commission's non-CEQA considerations, as shown below.

- Executive Summary: Consistent with CEQA Guidelines section 15123, this SEIR contains a brief summary that describes the Revised Project and its environmental consequences (including potential significant impacts and mitigation measures and alternatives that could avoid or reduce potential significant impacts), areas of controversy known to the Commission, and issues to be resolved.

- Table of Contents: Consistent with CEQA Guidelines section 15122, this SEIR contains a table of contents to assist readers in navigating the document.
- Section 1, Introduction: Contains a brief introduction to the application for new Leases to conduct sand mining activities within the lease areas over another 10-year period, including the Revised Project location and background and an overview of the environmental review process.
- Section 2, Project Description: Consistent with CEQA Guidelines section 15124, Section 2 discloses and shows on a detailed map the precise location and boundaries of the Revised Project, provides a statement of Applicants' objectives for the Revised Project, and generally describes the Revised Project's characteristics. Section 2 also identifies the agencies that are expected to use the SEIR in their decision making, and lists permits and other approvals that may be required to implement the Revised Project.
- Section 3, Project Impacts and Mitigation Measures: Consistent with CEQA Guidelines section 15125, Section 3 of this SEIR describes the environmental setting. Consistent with CEQA Guidelines sections 15126, 15126.2, 15126.4, and 15130, Section 3 also considers and discusses the direct, indirect, and cumulative environmental impacts of the Revised Project as well as mitigation measures that could, if implemented, avoid or reduce potential significant effects. Consistent with CEQA Guidelines section 15128, Section 3 identifies effects found not to be significant.
- Section 4, Alternatives: Consistent with CEQA Guidelines sections 15126(f) and 15126.6, Section 4 of this SEIR discusses alternatives, including a "no project" alternative.
- Section 5, Other Considerations: Consistent with CEQA Guidelines sections 15126 and 15126 subsections (c), (d), and (e), Section 5 addresses potential significant environmental effects that cannot be avoided if the Revised Project is implemented and considers significant irreversible environmental changes, and growth-inducing impacts. Economic and social effects are considered consistent with CEQA Guidelines section 15131. Other Commission considerations, such as CSLC's Public Trust responsibilities, also are discussed in SEIR Section 5.
- Section 6, Mitigation Monitoring Program.

- Section 7, Report Preparation and References. Consistent with CEQA Guidelines section 15129, SEIR Section 7 identifies the entities, organizations, and persons consulted as well as the people involved in the preparation of the SEIR.

This SEIR also contains the appendices listed below:

- Appendix A Existing Sand Mining Leases
- Appendix B Scoping Materials
- Appendix C Benthic Study
- Appendix D Bathymetric and Hydrodynamic Study
- Appendix E Consideration of Post-2012 Technical Studies
- Appendix F Existing 2012 Project Mitigation (as Amended) and Incidental Take Permits
- Appendix G Biological Resources Supplemental Information

**Table ES-1. Summary of Environmental Impacts for the Revised Project**

<b>Impact No.</b>	<b>Potential Impact (brief title)</b>	<b>Impact Class</b>	<b>Mitigation Measures</b>
<b>Section 3.2 Biological Resources</b>			
BIO-1	Potential displacement of special status species. Commercial sand mining in the San Francisco Bay-Delta may result in the direct and indirect physical displacement of special status fish species, including delta smelt, longfin smelt, green sturgeon, Chinook salmon, steelhead trout, and Pacific herring, Fishery Management Plan-managed pelagic fish and groundfish, marine bird species such as California brown pelican, and protected marine mammals, including California gray whale, humpback whale, California sea lion, harbor seal, and harbor porpoise.	III	LTS Impact; no mitigation necessary.
BIO-2	Potential impacts on fish and wildlife species from increased noise. Sand mining activities under the Revised Project result in increased noise at the location of the suction drag head on the seafloor that can result in increased disturbance to marine biota, especially fish, including special status fish species.	III	LTS Impact; no mitigation necessary.



**Table ES-1. Summary of Environmental Impacts for the Revised Project**

<b>Impact No.</b>	<b>Potential Impact (brief title)</b>	<b>Impact Class</b>	<b>Mitigation Measures</b>
BIO-3	Potential sand mining impacts on benthic habitat, infauna, epifauna, and foraging habitat.	III	LTS Impact; no mitigation necessary.
BIO-4	Discharge of suspended sediments under the Revised Project may potentially release contaminants into waters that affect plankton and wildlife species.	III	LTS Impact; no mitigation necessary.
BIO-5	Disturbance of sediments at the seafloor under the Revised Project could result in increased turbidity, SSC, and release of contaminants that potentially impact plankton and wildlife species.	III	LTS Impact; no mitigation necessary.
BIO-6	The Revised Project could result in smothering or burial of, or mechanical damage to, infauna and epifauna, and reduced fish foraging.	II	Implement MM BIO-6: Establish a 100-foot buffer around hard bottom areas within and adjacent to Central Bay mining leases.
BIO-7	The Revised Project will cause entrainment and mortality of common and managed aquatic species.	III	LTS Impact; no mitigation necessary.
BIO-8	The Revised Project operation of sand mining activities will cause entrainment and mortality of delta and longfin smelt.	I	Implement MM BIO-8: Applicants shall implement operational measures to minimize the potential for entrainment and mortality of delta and longfin smelt.

**Table ES-1. Summary of Environmental Impacts for the Revised Project**

<b>Impact No.</b>	<b>Potential Impact (brief title)</b>	<b>Impact Class</b>	<b>Mitigation Measures</b>
BIO-9	The Revised Project could cause the entrainment and mortality of green sturgeon, white sturgeon, Chinook salmon and steelhead trout during sand mining.	II	Implement MM BIO-9a: Applicants shall minimize the potential for entrainment and mortality of white sturgeon.  Implement MM BIO-9b: Applicants shall implement operational restrictions and requirements for the avoidance and minimization of entrainment of Chinook salmon.
BIO-10	Potential effects on fish movement and migration.	III	LTS Impact; No mitigation necessary.
CE BIO-1	Contribution to cumulative effects on biological resources.	III	LTS Impact; No mitigation necessary.
<b>Section 3.3 Mineral Resources</b>			
MIN-1	Loss of availability of a known mineral resource of value to the region or residents of the State.	III	LTS Impact; No mitigation necessary.
MIN-2	Loss of availability of a locally important mineral resource recovery site.	III	LTS Impact; No mitigation necessary.
CE MIN-1	Contribute to cumulative loss of availability of mineral resources.	III	LTS Impact; No mitigation necessary.
<b>Section 3.4 Hydrology and Water Quality</b>			
HYD-1	The Revised Project would have potentially adverse effects on water quality.	III	LTS Impact; No mitigation necessary.

**Table ES-1. Summary of Environmental Impacts for the Revised Project**

<b>Impact No.</b>	<b>Potential Impact (brief title)</b>	<b>Impact Class</b>	<b>Mitigation Measures</b>
HYD-2	The Revised Project would result in potentially adverse effects on the hydrology and geomorphology of the Bay and Delta.	III	LTS Impact; No mitigation necessary.
CE HYD-1	Contribution to cumulative effects on water quality.	III	LTS Impact; No mitigation necessary.
CE HYD-2	Contribution to cumulative effects on hydrology (sediment transport and coastal morphology).	III	LTS Impact; No mitigation necessary.
<b>Section 3.5 Hazards and Hazardous Materials</b>			
HAZ-1	Potential for accidental leak or spill of hazardous materials.	II	Implement MM. HAZ-1: Provide a California Non-tank Vessel Contingency Plan/ Certificate of Financial Responsibility.
HAZ-2	Hazard to the public or environment.	III	LTS Impact; No mitigation necessary.
CE HAZ-1	Contribution to cumulative effects on hazards and hazardous materials.	III	LTS Impact; No mitigation necessary.
<b>Section 3.6 Air Quality and GHG Emissions</b>			
AIR-1	Conflict with or obstruct implementation of an applicable air quality plan.	III	LTS Impact; no mitigation necessary.
AIR-2	Violate air quality standard or contribute substantially to air quality violation.	III	LTS Impact; no mitigation necessary.
AIR-3	Contribute to cumulative emissions of criteria pollutants for which the region is in non-attainment under an ambient air quality standard.	III	LTS Impact; no mitigation necessary.

**Table ES-1. Summary of Environmental Impacts for the Revised Project**

<b>Impact No.</b>	<b>Potential Impact (brief title)</b>	<b>Impact Class</b>	<b>Mitigation Measures</b>
AIR-4	Expose sensitive receptors to substantial pollutant concentrations.	III	LTS Impact; no mitigation necessary.
AIR-5	Generate objectionable odors.	III	LTS Impact; no mitigation necessary.
AIR-6	Expose people to increased risk of cancer.	III	LTS Impact; no mitigation necessary.
AIR-7	Result in acute or chronic non-cancer health risk.	III	LTS Impact; no mitigation necessary.
AIR-8	Result in emissions of GHGs that may have an impact on climate change.	II	Implement MM AIR-1 Greenhouse Gas (GHG) Reduction Plan.
AIR-9	Result in GHG emissions that may conflict with any applicable plan, policy, or program.	II	Implement MM AIR-1 Greenhouse Gas (GHG) Reduction Plan.
CE AIR-1	The Revised Project has a low potential to cause a cumulatively considerable contribution to potential significant cumulative effects on air quality.	III	LTS Impact; no mitigation necessary.
<b>Section 3.7 Cultural and Tribal Cultural Resources</b>			
CUL-1	Inadvertent discovery of archaeological historic resources, prehistoric Native American sites, or tribal cultural resources.	II	Implement MM CUL-1a: Cease operations and notify CSLC and USACE. Implement MM CUL-1b and MM CUL-3 Cease operations and notify consulting Native American tribes if the find is Native American in origin

**Table ES-1. Summary of Environmental Impacts for the Revised Project**

<b>Impact No.</b>	<b>Potential Impact (brief title)</b>	<b>Impact Class</b>	<b>Mitigation Measures</b>
CUL-2	Disturbance of a paleontological resource or unique geological feature.	III	LTS Impact; No mitigation necessary.
CUL-3	Inadvertent discovery of human remains.	II	Implement MM CUL-3: Cease operations and notify County Coroner.
CE CUL-1	Contribute to cumulative impacts resulting from inadvertent discovery of cultural or tribal cultural resources.	II	Implement MM CUL-1a, MM CUL-1b, MM CUL-3, and MM CUL-4: Cease operations and notify consulting Native American tribe if find is Native American in origin.
<b>Section 3.8 Land Use and Recreation</b>			
LU-1	Incompatible land uses.	III	LTS Impact; No mitigation necessary.
LU-2	Incompatible recreational uses.	III	LTS Impact; No mitigation necessary.
LU-3	Residual impacts on recreational resources; interference with sand replenishment at down-current beaches.	III	LTS Impact; No mitigation necessary.
LU-4	Conflicts with adopted land use policies.	II	Implement MM AIR-1, MM BIO-6, MM BIO-8, MM BIO-9a, MM BIO-9b, MM HAZ-1, MM CUL-1, MM CUL-3, MM CUL-4.
CE LU-1	Contribution to cumulative effects on land use and recreation.	II	Implement MM AIR-1, MM BIO-6, MM BIO-8, MM BIO-9a, MM BIO-9b, MM HAZ-1, MM CUL-1, MM CUL-3, MM CUL-4.