

Hillside Specific Plan
City of Saratoga

(Formerly "Northwestern Hillside Specific Plan", originally adopted 1981)

Planning Commission Recommended Approval of Amendment on 5/25/94

Amendment Adopted by City Council on 6/15/94

SPECIFIC PLAN

PREFACE: *This report, attached maps and references are a specific plan for the residential development of approximately 2,100 acres in the hillside area of Saratoga and adjacent Santa Clara County lands. This report and maps have been prepared under the guidance of an 11 member Citizen Advisory Committee and has been reviewed and revised by the City Planning Commission and the City Council prior to adoption.*

The Specific Plan has been prepared pursuant to the applicable provisions of Title 7 of the California Government Code and the Initiative, after careful review of the area, the related City documents and further circulation and economic studies. As adopted by the City, the Saratoga Hillside Specific Plan will guide the subsequent subdivision and development of the property within the primary planning area and responses to referrals from the County in the secondary planning area.

ENVIRONMENTAL ANALYSIS PROCESS: *An Environmental Impact Report is required by State law for projects which may have significant effects upon the environment. The Environment Impact Report primarily is a document which informs the public and responsible agencies about the proposed project and enables them to comment in order to influence the decision of the project.*

State law regarding Specific Plans encourages an Environmental Impact Report to be done in conjunction with the Plan and to serve as the Environmental Impact Report for each development proposal found consistent with the General Plan and Specific Plan. This Environmental Impact Report provides base documentation for both the Specific Plan and subsequent development applications. However, given the substantial difference between the specificity of a Specific Plan and that required for a development application, further environmental information (i.e., details of structure types and design, siting, archeology, circulation specifics, etc.) may be required to augment the Environmental Impact Report.

The descriptive portion of the Environmental Impact Report is located in the Appendix of the Specific Plan. The Environmental Impact Report describes the project and its environment; discusses the significant impacts of the project, analyzes the impacts, and describes alternatives. Measures to reduce the impacts have been included in the appropriate policy sections. Emphasis is placed on those areas having potentially significant environmental effects. The Initial Study, prepared by the City Staff subsequent to a Public Hearing, is also included in the Appendix. The Initial Study indicated that significant impacts could occur in the following areas: grading, erosion, geology, drainage, flora and fauna, density, circulation, services, utilities and aesthetics.

The Draft Environmental Impact Report has been transmitted to interested persons and agencies to solicit comments. These comments, with addition or corrections during the Public Hearing, have resulted in a Final Environmental Impact Report, providing information for the decision. This final decision was made by the City Council of Saratoga after input from the Citizens Advisory Committee and the Planning Commission.

An addendum to the Northwestern Hillside Environmental Impact Report was prepared as part of the City Council review and update in 1994.

INTRODUCTION: In April 1980 the citizens of Saratoga adopted an initiative "directing preparation of a specific plan for the Northwest Hillside of the City of Saratoga and adjacent County lands" in accordance with the initiative and the Community Planning Objectives of the 1974 General Plan. The primary goal of the initiative was "to conserve the City's natural rural character" by controlling the density of development in the hill areas and allowing development in an environmentally sensitive manner. Special development problems were noted - street slopes, potential landsliding and difficult access. Citizen participation was required at all stages.

In June the City Council designated an 11 member Citizens Advisory Committee. The Committee began bi-monthly meetings on June 26, 1980, inspecting the Study Area, reviewing related City and County documents and meeting with various experts from responsible agencies and land use consultants. In all the Committee met 18 times with 4 additional subcommittee meetings on the proposed policies and including 2 on-site inspections. Notices for some of these meetings were placed in the Saratoga News and all agendas were mailed to 5 area homeowners groups as well as the affected property owners, their representatives, and interested citizens. During the course of the study, a circulation study by Nolte and Associates and an economic study by John Cone were completed for the area and presentations were made by the City Geologist. A \$2,500.00 study to review the options for hydrology studies in the area was recommended and agreed to by the City Council, which has now been approved by the Santa Clara Valley Water District.

The Plan was prepared to meet the requirements of the Initiative and State law. However, its more important purpose is to set up guidelines for the development of the northwestern hillsides, including policies and action programs with land use maps which are more detailed than the General Plan. It is intended to better link the Saratoga General Plan with subdivision and zoning regulations while not being a site specific development plan.

The Specific Plan:

- * provides a comprehensive plan for the northwestern hillsides and reviews the planning area in conjunction with all elements of the General Plan.*
- * identifies major issues and assumptions on development in the hillsides and develops policies accordingly.*

** proposes ways of dealing with special design and environmental concerns.*

** sets criteria for development plans submitted to the City on density, access and circulation, to preserve rural character and minimize use of public facilities.*

In summary, this specific plan provides guidelines and controls to conserve the rural character, while maintaining public safety and minimizing excessive public costs to the citizens of Saratoga. It also gives guidelines to affected property owners in the Specific Plan boundary area on land use options.

The Specific Plan was reviewed and updated by the Saratoga City Council in 1994.

SUMMARY OF GOALS, POLICIES AND ACTION PROGRAMS
OF THE HILLSIDE SPECIFIC PLAN

GOALS: *The goals of Measure "A" and those of the 1974 General Plan affecting this area, are adopted. Furthermore, the following goals are established:*

- 1. Land use regulations shall be consistent with the preservation of the irreplaceable natural environment of the Measure "A" area.*
- 2. Access shall be compatible with preservation of rural character and reduced density of development.*
- 3. Impacts on the overall natural environment shall be minimized in order to preserve the rural character.*
- 4. Land use regulation shall be based upon natural, flood and geologic hazards.*
- 5. Development and maintenance of public services shall minimize financial risks to the City and shall be equitable to all citizens of Saratoga.*
- 6. The Specific Plan shall be applied with concern for individual property rights.*
- 7. Overall long term financial, public health and safety risks to both present and future residents shall be minimized.*
- 8. The City's irreplaceable hillside scenic resources shall be protected and preserved.*
- 9. The rural character of the area shall be protected through substantially lower density and a compatible relationship between development and the land.*

POLICIES AND ACTION PROGRAMS

DENSITY

Policies

1. *Land use in the western hillside area should be limited to agricultural and residential uses and appurtenances thereto with plant nurseries, wineries, and recreational facilities subject to the granting of a conditional use permit. Such other uses will be allowed as may be added by the City Council consistent with the purposes and intent of the Specific Plan and Zoning District established.*

2. *Maximum density of development shall be based on the 2-10 acre slope density formula subject to the following criteria.*

a. *Any uncorrectable geotechnical hazard areas of the site, (areas designated Md or Mrf, as described in Table 7 of the Geologic Hazard Analysis of the Upper Calabazas Creek Watershed by William Cotton and Associates dated January 1980, and those portions of the Cocciardi and Paul Masson quarries shown by a geotechnical analysis to be unsuitable for development as approved by the City Geologist) shall be placed in permanent open space and subtracted from the gross acreage prior to application of the slope density formula. Calculation of the slope shall be done for the entire parcel prior to the slope density calculation.*

b. *Density may be further reduced due to site restrictions (see Geologic and Site Grading policies for siting restrictions due to geology, riparian areas, etc.). In locating building sites, preference should be given to areas designated as stable (Sbr, S1s, Sun, Sex) on the Ground Movement Potential Maps. Especially sites on potentially moving slopes, (Pmw, (Pmw, Ps, Pd) and moving slopes (Ms) shall not be approved unless geologic and soils engineering analysis and design provided by the developer clearly demonstrate the long-term stability of such sites to the satisfaction of the City, its Geologist and other professional consultants.*

2. *Any lot shown as a unit on a recorded subdivision or land division, or any lot otherwise legally created, is exempt from the density requirements of this Specific Plan provided it was created prior to April 25, 1978. Any lot so exempted will not lose its exempt status if either of the following events takes place subsequent to April 25, 1978:*

a. A portion of the lot is exchanged for a portion of any adjoining lot, the result of which does not decrease the original square footage of the lot; or

b. The lot is enlarged by the addition of land from any adjoining parcel.

Action Program

1. Amend Zoning Ordinance to carry out density policies and standards of the Specific Plan and General Plan.

COUNTY LANDS/SECONDARY SPECIFIC PLAN AREA

Policies

1. City should control the development of adjacent lands (developed and undeveloped) with a preferred density of 20-160 acres/unit depending on slope.

2. Lands shall not be annexed until they can be served by the City as determined by the City Council.

Action Program

1. Consider a pre-zoning density designation for County lands.

2. Identify lands that the City can serve within the next five (5) years and review Urban Service Areas accordingly.

SITE GRADING

Policies

1. Grading, when required, shall be contoured wherever possible even though this practice increases quantity somewhat, and provide cut and fill slopes of three to one. Graded slopes should be 3:1 overall (with potential for terracing and ability for landscaping). Revegetation of graded slopes shall be required. Steeper fill slopes, up to 2:1 may only be used where it can be shown landscaping and revegetation can be installed and maintained. Steeper but slopes, up to 2:1 may only be used where it can be shown the slope can be adequately landscaped and maintenance over the long term will not be a problem and/or unusually difficult.

2. No home shall be built so as to create a flat visible pad.

3. Allow corrective grading in the western hillsides to minimize risks from geologic hazards especially for new or existing development provided it does not remove major trees or irrevocably damage the City's scenic resources.

4. Grading should be minimized by locating roads and homesites on slopes less than 30% unless given prior specific approval by the governing bodies.

5. Landslide and erosion problems on developing lands shall be avoided or corrected, including replanting removed and damaged trees where the benefit to the general public exceeds the environmental impact of the corrective project. City may require that such problems be corrected on adjacent lands.

6. Roads should be aligned parallel to contours rather than up the face of hills wherever possible to minimize their visibility from the valley.

7. Correction of stream erosion problems shall be accomplished using natural and/or natural appearing materials. Such improvements shall be considered engineered grading (and therefore be subject to Planning Commission approval).

8. Long-term maintenance of landscaped areas, open space, streams and slopes adjacent to roads shall be assured by private maintenance agreements included in subdivision CC&R's with provisions for City enforcement.

9. Large, one time grading operations, under proper control should be promoted as opposed to single lot-by-lot operations by individual lot owners. All necessary lot, driveway and pool pad grading should be done by the developer under bond and strict City control.

10. No home or other structure shall be built on an area with an average slope that exceeds 30% or an area that exceeds 40% natural slope at any point under the structure with possibility for variance procedure and exception from the Subdivision Ordinance for unusual situations.

11. Placement of creeks in culverts for private land use shall not be permitted except in extreme emergencies (i.e., potential loss of structure(s), economic considerations, health, safety and welfare). Use of culverts for road crossings may be permitted.

12. Engineered grading items on the Planning Commission agenda shall be public hearings.

Action Program

1. *Revise Grading Ordinance accordingly.*

AESTHETICS/SCENIC QUALITIES

Policies

1. *Grouping of residential units shall be encouraged to preserve the rural character and to allow reasonable economics of land use provided there is no increase in yield.*
2. *Place homes near streets where appropriate to minimize grading. Arrange lot patterns to minimize the length of roads and driveways.*
3. *Predominant ridgelines shall be protected to allow clear views from streets and roads. Scenic easements shall be established to protect the ridgelines which cup the City.*
4. *All structures shall be approved through Design Review prior to issuance of building permits.*
5. *Encourage common recreational areas.*

Action Program

1. *Develop a map delineating predominant ridgelines cupping the City in the western hillsides.*
2. *Modify the HCRD Ordinance to implement the foregoing policies.*

ECOLOGY

Policies

1. *Minimize earthmoving and grading, avoiding steep terrain except where necessary for roadways.*
2. *Design structures to fit terrain; group structures; phase building with improvements.*
3. *Minimize tree removal; avoiding heavily wooded areas, particularly chaparral.*

4. *Minimize disturbance of creek ecosystems by placing riparian areas in open space.*

5. *Limit horsekeeping and use.*

6. *Propose trails away from creeks.*

7. *Revegetate graded areas as soon as feasible with native plants.*

Action Program

1. *Review and condition tentative maps accordingly.*

CONSERVATION: Land, Air and Water Quality

Policies

1. *The number of horses permitted shall be limited to the capacity of the site.*

2. *Preserve natural (creekside) vegetation to the greatest extent feasible.*

Action Program

1. *Revise the Zoning Ordinance with respect to the keeping of horses and their appurtenant structures (at a minimum to disallow fences on property lines).*

2. *Establish conditions for horse permits and use permits for the keeping of horses.*

3. *Review and revise Grading Ordinance with consideration of water quality.*

WILLIAMSON ACT

Policies

1. *The following criteria should be used in determinations on cancelling Williamson Act contracts:*

a. *Conformity with the Williamson Act in determinations on cancelling Williamson Act contracts:*

- b. *Open Space Value of the parcel of land.*
 - c. *Impact on other Williamson Act lands.*
 - d. *Availability of utilities.*
 - e. *Public benefits.*
2. *Encourage renewal of Williamson Act contracts.*

Action Program

1. *Adopt resolution establishing criteria of cancellation of Williamson Act contracts.*
2. *Establish a list of permitted or conditional uses with the objective of Williamson Act land being preserved for open space for the Specific Plan area.*

TRAILS AND PATHWAYS

Policies

1. *Develop equestrian/pedestrian trail system for access to County recreation areas and Midpeninsula Regional Open Space District concurrently, or prior to, the development of each lot.*
2. *Encourage trails and pathways along roadways.*

Action Program

1. *Require development and a method of maintenance of equestrian/pedestrian trail system as part of subdivision/site approval.*
2. *Develop program to promote and maintain trails in the Western Hillside per the Trails and Pathways Task Force Report.*

OPEN SPACE

Policies

1. *Preserve the low density and natural character of Saratoga by the inclusion of permanent open space, landscaping and encouragement of agricultural land uses.*

2. Conserve natural vegetative and topographic features which exist in Saratoga's western foothills.
3. Protect historical and archeological values and significant geographic landmarks from destruction by development whenever practical.
4. Require open space be dedicated as easements (all Md and Mrf areas, quarry lands shown to be unsuitable for development through detailed geotechnical analysis as approved by the City Geologist and lands within the setback area specified by the City Geologist for traces of the Berrocal fault). Consider open space easements on riparian areas and areas with slopes of over 30%.
5. Preservation of open space should mean preservation of the natural landscape.

Action Program

1. Establish a legal format for accepting open space easements and provide a means for maintaining the open space easements.
2. Revise the Zoning Ordinance to conform to these policies.
3. Implement agricultural zoning where appropriate to preserve open space.

LAND MAINTENANCE

Policies

1. Benefit of residential land use in the hills falls to hillside residents and to them should fall any extraordinary costs for maintenance of the lands and features other than City and Utility Services.

Action Program

1. Consider an ordinance and procedural requirements which ensure residents of hillside subdivisions pay the extraordinary cost of maintenance of all non-public facilities. Private maintenance agreements, enforceable by the City without extraordinary public costs should be developed and included in CC&R's.
2. Consider use of orders of abatement pursuant to police powers to ensure private maintenance of drainage and grading improvements (i.e.

Weed Abatement Ordinance).

GEOLOGY AND SOILS

Policies

1. *Benefit of residential land use in the hills falls to hillside residents and to them should fall an extraordinary costs for maintenance of the lands and features other than City and Utility Services.*

2. *Every applicant seeking approval of any construction project within the Specific Plan Area shall at times have the burden of providing, to the satisfaction of the City and its Geologist and other professional consultants, that the proposed development will be constructed in such a manner as to be safe from known or reasonably predictable geologic hazards which may cause injury to persons or property.*

3. *The Geologic Hazards Analysis of the Upper Calabazas Creek watershed is a planning document which may require modification.*

4. *No deviations or modifications of the Maps shall be permitted without prior written approval of the City Geologist.*

5. *In locating building sites, preference should be given to areas designated as stable (Sbr, Sls, Sun, Sex) on the Ground Movement Potential Maps. Especially sites on potentially moving slopes (Pmw, Ps, Pd) and moving slopes (Ms) shall not be approved unless geologic and soils engineering analysis and design provided by the developer clearly demonstrate the long-term stability of such sites to the satisfaction of the City, its Geologist and other professional consultants.*

6. *On questionable sites the City Geologist may require slope stability analysis with the building site and its immediately surrounding area having a factor of safety against failure of a least 1.5 or equivalent, in the event of a designed earthquake of magnitude 8.3 on the San Andreas Fault. The City Geologist shall review and approve all proposed designs which meet this requirement.*

7. *The City, Santa Clara Valley Water District, Evergreen Resource Conservation District and Santa Clara County should immediately commence proceedings with the landowners for the stabilization of the abandoned quarry areas on the Paul Masson Vineyard and Cocciardi properties as well as other erosion reduction activities.*

8. *If grading proposed for a project, as specifically approved by the Planning Commission, City Geologist and City Engineer, corrects a geologic hazard, then roads, driveways and structures may be located on such graded areas as approved.*

9. *Projects or portions thereof that require a high level of maintenance activity over the long-term to prevent slope failures should generally not be approved since the City's ability to perform or enforce performance of maintenance is limited. Project design should principally use solutions that minimize risk in not affecting public or private structures in the event of failure.*

10. *City should continue to strictly enforce its Grading Ordinance through the City Geologist and Department of Inspection Services and control of all work by soils engineer and geologist on all projects in hillsides.*

Action Program

1. *Design and/or revise Ordinances to carry out the above policies for entire Specific Plan Area.*

HYDROLOGY AND FLOODING

Policies

1. *For site specific policies, see Site and Storm Drainage.*

2. *City Council, Planning Commission and City Staff should continue all available efforts to secure remedy to flooding and erosion problems along the main Calabazas and in already developed areas.*

3. *Long-term maintenance of natural watercourses of smaller size than would qualify for Santa Clara Valley Water District jurisdiction should be by homeowners in tributary areas using private resources and with City review and approval of any proposed improvements or maintenance.*

4. *Continue (and expand to include the Specific Plan Area) pro-rata share fees for drainage, insuring that they are large enough to pay all costs of necessary facilities to eliminate flooding at the 100 year storm level.*

5. *Recommend continuing support of long-term study of hydrology of area.*

Action Program

1. *Work with the Santa Clara Valley Water District to develop appropriate procedures for the above policies.*

FIRE HAZARD

Policies

1. *Encourage landscaping with non-hazardous, drought resistant vegetation.*

Action Program

1. *Recommend landscaping of non-hazardous vegetation at CC&R stage.*

NOISE

Policies

1. *Minimize impact on the existing ambient noise level of the rural areas of the western hillsides through setbacks, construction techniques, roads, etc.*
2. *Where appropriate, be sensitive to limiting hours of construction.*

Action Program

1. *Review Noise Ordinance to be consistent with the above policies.*
2. *Review and strengthen Off-Road Vehicle Ordinance.*

ENERGY

Policies

1. *Promote energy conservation through building design (as with roof orientation of new homes).*
2. *Promote use of both passive and active solar energy systems.*

Action Program

1. *Consider cooperation with County on Energy Element and adoption of related ordinances.*

CULTURAL RESOURCES

Policies

1. *Involve the historical society early in the tentative map process.*
2. *If archeological or historical objects are encountered during construction, halt activity and seek advice of qualified archeologist or local historian.*
3. *Prior to tentative map approval, conduct an archeological study of each site by a professional archeologist for recommendations/mitigation.*

Action Program

1. *Adopt a Cultural Resource Ordinance.*

WATER

Policies

1. *Upgrade provisions of water for adequate fire protection in the hillsides.*
2. *Improve supply of water for fire protection for existing homes by establishing the water improvement project.*

Action Program

1. *Allow formation of the water assessment district.*
2. *Continue Subdivision Ordinance Section with requires 1,000 gallons per minute of water for any new development prior to issuance of building permit.*

FIRE/EMERGENCY SERVICES

Policies

1. *Require wiring for Early Warning Fire Reporting System adopted by Saratoga Fire District Board with optional hookup to homeowner.*
2. *Improve response time for hillside area.*

Action Program

1. *Adopt Early Warning Fire Reporting System Ordinance.*
2. *Study need for a Fire Station in the western hillsides and possibly for joint ownership between the two fire districts.*
3. *Consider specifying roofing requirements (other than wood).*
4. *Adopt such other measures as are necessary to increase fire protection in this area.*

SANITARY SEWER SERVICE

Policies

1. *Require all new residences on newly created lots to hook up to a sanitary sewer system to avoid groundwater contamination problems.*
2. *Existing residences should hook up to sewer if the structure comes within 200 feet of the sewer main.*

Action Program

1. *Allow the formation of assessment districts for sewer systems on existing lots with criteria for exemptions.*

TELEPHONE, PG&E, CABLE TV

Policies

1. *All new utility lines should be located underground when possible.*

Action Program

1. *Coordinate utility construction throughout the hillside areas whenever possible.*

PARK SYSTEM

Policies

1. *The park site on the Fremont High School parcel should be reviewed by the Parks and Recreation Commission.*
2. *Condition maps for development of trail system for access to the County recreation areas concurrently with development of the subdivision.*
3. *Encourage scenic open space.*

Action Program

1. *Require development of equestrian trail system prior to final building approval.*

GARAGE/SOLID WASTE DISPOSAL

Policies

1. *Reduce dependence on sanitary landfill.*

Action Program

1. *Utilize Guadalupe site.*
2. *Comply with resource recovery program of Solid Waste Management Program.*

SITE AND STORM DRAINAGE

Policies

1. *Developer, through actual improvements and fees, to provide for installation and maintenance of Storm Drainage System.*

2. All major facilities to be designed to provide for 100 year storms - local and minor facilities design provide for 20 year storms.

3. Landscaping and resultant site drainage plan to be approved with Design Review approval of the residence prior to issuance of permits.

4. Site drainage plans to be approved so as to not impact adjacent properties.

Action Program

1. Increase improvement criteria and fees if called for in study.

POLICE SERVICES

Policies

1. Encourage participation in a neighborhood crime prevention program.

Action Program

1. Require installation of wires and recommend connection to a residential electronic fire and burglary detection system.

2. Adopt ordinance(s) to require security measures appropriate for the area.

3. Recognize increased need for police services access gate and security review by Sheriff's Department.

CIRCULATION

In reviewing the findings of this report, previous reports and current City policies, the following plan is recommended for adequate circulation and emergency access:

Policies

1. Continue current policy of general minimum road standards with Planning Commission. Ability to authorize exceptions given special circumstances or conditions affecting the subject property.

2. Minimize cuts and fills for roadways.

3. *Utilize retaining walls to reduce grading.*
4. *Overdesign structural section of roadways by 25%.*
5. *Require public right-of-way to be offered on all private access roads used for secondary/emergency access.*
6. *Allow secondary/emergency access roads to be generated.*
7. *Roads must be built to insurable standards.*
8. *The City shall obtain private road maintenance agreements with subdivision developers.*
9. *The City shall whenever possible, require private developers and landowners to maintain private landscaped areas within right-of-ways.*

Action Program

1. *Construction standards for each new road shall be developed to minimize future maintenance and repair requirements and the risk of failure of those roads.*
2. *A public through road, Saratoga Heights Road, between Tollgate and Pierce Roads.*
3. *An emergency access road from Hillmoor through the Fremont Union High School District site.*
4. *Extensions of all other roadways shall be considered for emergency/secondary access at the time of development.*

Pierce Road Policies:

1. *Collect fees on a per lot basis of those newly created lots to establish a fund for improving Pierce Road in a manner that would not significantly alter its character as follows:*
 - a. *13 foot paved lanes where widening does not impact the environment.*
 - b. *11 foot paved lanes as a minimum where feasible.*
 - c. *12 foot between centerline and vertical obstructions (minimum).*

d. Overlay existing pavement to provide smooth driving surface.

e. Appropriate signs before major intersections.

2. Any tree removal or extensive grading necessitated by pavement widening shall have City Council approval.

Action Program

1. Adopt Circulation Plan for western hillsides.

2. Consider widening of bridges on Pierce Road.

3. Condition tentative maps appropriately.

4. Develop improvement plan for Pierce Road.

ECONOMICS

Policies

1. The risk of failure of newly constructed roads shall be shared by future property owners served by those roads; property owners shall share in that risk of failure with the City for roads accepted as public streets.

Action Program

1. The City shall develop a standard method for determining the risk of road failure and for calculating a financial exposure associated with acceptance of that risk.

2. Prior to acceptance of a road as a public street, the entire amount determined to be the costs associated with the identified potential risk of road failure shall be deposited with the City. The City shall hold the deposit in trust to fund future repair costs which exceed the City's routine street maintenance obligations.

PROPOSED ZONING RESTRICTIONS

Policies

1. Allow plant nurseries and wineries as conditional uses.

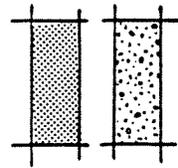
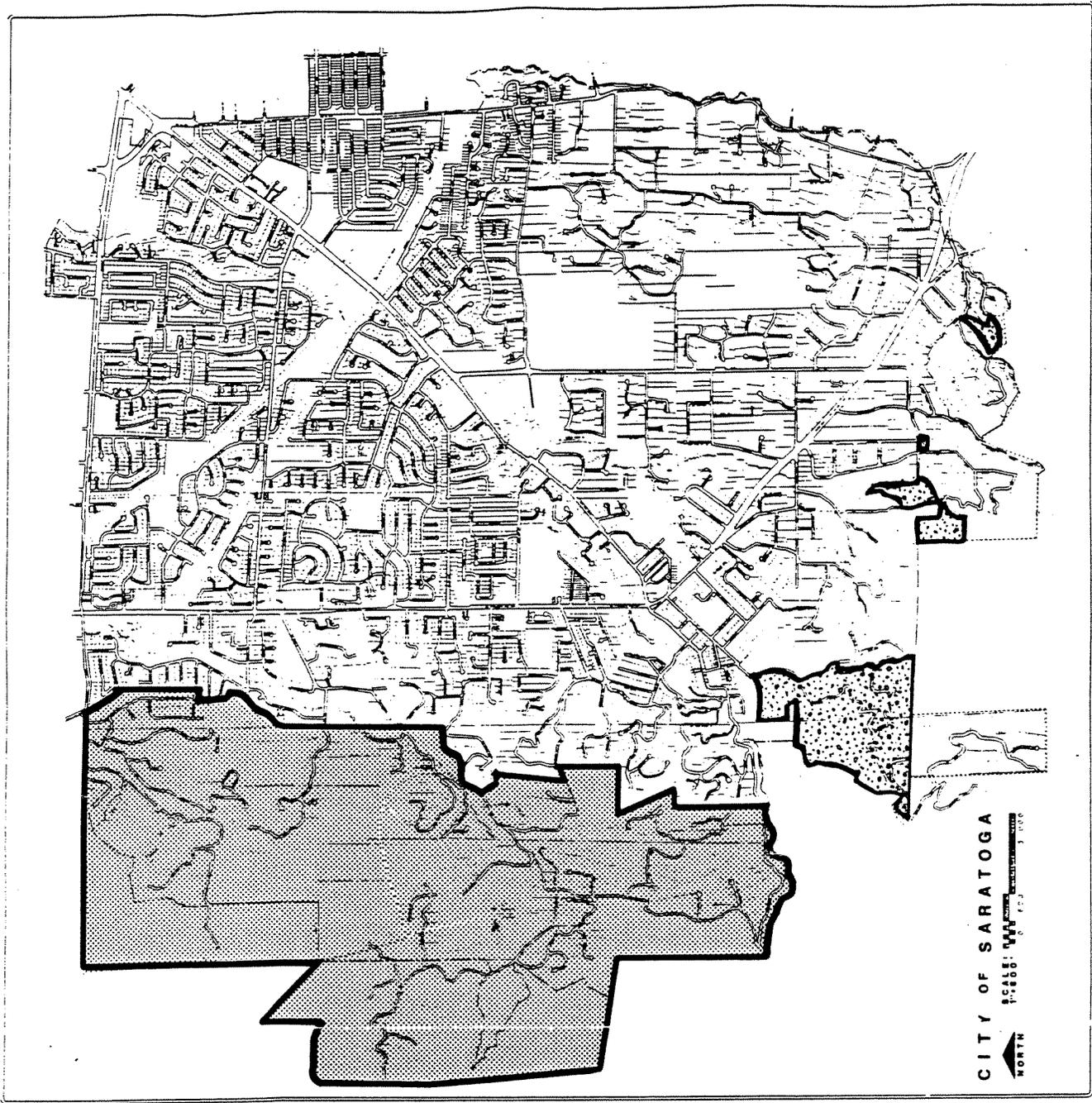
2. Promote recreational facilities.

3. Inform prospective buyers through CC&R's as to whether or not a pool and/or tennis court can be constructed on the site.

Action Program

1. Revise necessary City Ordinances to implement Specific Plan.

2. Condition tentative maps appropriately.



EXISTING PLAN AREA

PROPOSED EXPANSION AREA

000038