



STAFF REPORT

Permit Number: 15 00378 | DJM Construction

DATE: March 2, 2016

TO: Kitsap County Board of Commissioners; Kitsap County Planning Commission

FROM: Katrina Knutson, AICP, Senior Planner, DCD and

Jeff Arango, AICP, Senior Associate, BERK Consulting

RE: DJM Construction Reclassification Request

APPLICATION INFORMATION

1. **Applicant Name:** Bill Broughton, DJM Construction Co. Inc. (applicant and owner)
2. **Parcel Number:** 272702-2-047-2003
3. **Address or location information:** Near the corner of Miller Bay Rd. NE and NE State Highway 104; see Attachment 1. Commissioner District 1.
4. **Current Land Use:** Undeveloped; see Attachment 3.
5. **Current Comprehensive Plan Map Designation:** Rural Residential/Rural Protection
6. **Proposed Comprehensive Plan Map Designation:** Urban Low-Intensity Commercial/Mixed-Use
7. **Current Zoning:** Rural Residential (RR)/Rural Protection (RP) and NC; see .
8. **Proposed Zoning:** Same zoning, difference configuration; see .
9. **Lot Area / Size:** 8.36 acres
10. **Comprehensive Plan Alternatives:** Request included with Comprehensive Plan Update 2016 Supplemental Environmental Impact Statement (SEIS) Alternative 3.
11. **Preferred Alternative:** The request is not included in the Preferred Alternative.

Submitted Application Materials

- Project Application
- Reclassification Request Criteria
- Environmental Checklist

- Ownership Certification

Application Request

The applicant is requesting relocation of the existing NC zoning currently situated in an isolated wetland to a similarly sized developable area fronting either SR 104 or Miller Bay Road from Rural Residential (RR) or Rural Protection (RP). This relocation will also result in the existing NC zoning returning to RR so that no new NC area is created. The applicant has indicated it will short plat the parcel with NC zoning after the amendment is approved and has offered to dedicate a 50 foot conservancy easement to the Nature Conservancy on the east boundary adjacent to the Grovers Creek wetland.

BACKGROUND

The adjacent George’s Corner LAMIRD boundary was established in 2004. After appeal and adjudication in 2004, the Washington State Growth Management Hearings Board made specific notice of the boundary, which is adjacent to the subject parcel. The Growth Board excerpt is below:

The County chose to use the physical contours of the land and the presence of wetlands to define the boundary of the LAMIRD. Consistent with .070(5)(d)(iv)(B), this is likely to result in permanent boundaries that are less subject to pressures for commercial expansion and sprawl. The wetlands and critical areas may help buffer the commercial uses from the surrounding rural lands. The County required a lot-line adjustment on the Bjarnson property to further contain the LAMIRD.

Futurewise, Harless, KCRP v. Kitsap County, CPSGMHB 04-3-0031c, Final Decision and Order (FDO) (6/28/05).

The existing LAMIRD boundary was based in part on the presence of wetlands and geologic hazards on the subject property as shown in Attachment 2. The complex of wetlands is directly associated with Grover’s Creek, an important fish-bearing stream which empties into Miller Bay. (Wetland delineation mapping attached).

As shown in maps included in this report, a Short Plat (200511300408/409) was recorded following the establishment of the LAMIRD that resulted in the creation of new lots and split-zoning. This split-zoning (RP, RR, NC) was not created by an action of the County.

Surrounding Zoning and Land Use

The site abuts NC zoning to the north and west but RR and RP to the east and south.

Exhibit 1. Summary of Surrounding Areas Current Zoning and Land Use

Surrounding Areas	Current Zoning	Current Land Use
North	• NC	• Trade (Commercial) and Government Services
East	• RP	• Undeveloped
South	• RR/RP	• Undeveloped
West	• NC	• Residential and Trade (Commercial)

Source: Kitsap County GIS; BERK Consulting 2015

Current Future Comprehensive Plan and Zoning Designations

The subject property is currently designated as Rural Residential and Rural Protection on the Comprehensive Plan Map. The Comprehensive Plan describes the designations as:

- **Rural Protection (RP):** This designation is intended to allow low-density development in keeping with rural character and to protect significant environmental features, including visual, historic, and natural features; wildlife corridors; steep slopes; wetlands; streams; and adjacent critical areas. It is implemented by the RP zone.
- **Rural Residential (RR):** This designation is intended to allow low-density residential development consistent with rural character, and primarily focuses on single-family dwellings. This designation is applied to areas that are relatively unconstrained by environmentally sensitive areas or other significant landscape features, and also recognizes areas that are already committed to a pattern of smaller rural lots. The RR designation is implemented by the Rural Residential zone.

According to the Kitsap County Code (Chapter 17.305 Kitsap County Code (KCC)), the RP zone is intended to “promote low-density rural development that is consistent with rural character and protects environmental features such as significant visual, historical, natural features, wildlife corridors, steep slopes, wetlands, streams and adjacent critical areas.” This zone allows for residential, commercial, resource, and recreational uses that are compatible with rural character. The maximum density is 1 dwelling unit per 10 acres.

The RR zoning designation (Chapter 17.310 KCC) promotes “low-density residential development consistent with rural character. It is applied to areas that are relatively unconstrained by environmentally sensitive areas or other significant landscape features. These areas are provided with limited public services.” RR has a maximum density of 1 dwelling unit per 5 acres. This zone allows for residential and limited commercial, resource and recreational uses that are compatible with rural character.

Rural character is referenced in both designations and zones. Chapter 3 Rural and Resources Lands of the Comprehensive Plan has a detailed description of rural character as well as goals and policies. Some of the characteristics defining rural character include:

- Relatively undeveloped nature
- Lots 5 acres and over
- Agricultural and forest activities
- Land for wildlife and nature
- Personal open space for tranquility (enjoyment of personal property)
- Responsive public services, sense of being self-sufficient
- Wooded trail systems
- Views of the Hood Canal, Puget Sound, the Olympics and Mount Rainier
- Small businesses serving the local population
- Small, intimate communities
- Low population density
- Large forested areas
- Quiet two lane roads

Proposed Future Comprehensive Plan and Zoning Designations

As described in the current Comprehensive Plan, the proposed Comprehensive Plan Map Designation is Limited Area of More Intense Rural Development (LAMIRD) – Type I. The Comprehensive Plan describes the designation as follows:

- **Type I.** The only type of LAMIRD currently designated in Kitsap County prior to 2010, this designation is characterized as infill development or redevelopment of existing commercial,

industrial, residential, or mixed-use areas, whether as shoreline development, villages, hamlets, rural activity centers, or crossroads. Any industrial development within a Type 1 LAMIRD must be principally designed to serve the rural population. Any new development or redevelopment must be consistent with existing character of the area with respect to building size, scale, use, or intensity. Type 1 LAMIRDs must have been established as more densely developed areas as of July 1990, and they must include pre-GMA existing development. Type 1 LAMIRDs also must be bounded by a “logical outer boundary” that mirrors the limits of the pre-existing development.

The list of allowable uses differs substantially between NC and RR/RP. This relates to the intent of the NC for commercial uses and RR/RP for large lot rural residential uses.

Exhibit 2. Selected Allowed Uses (KCC 17.381.040.B and .E)

Selected Uses	NC (proposed zoning)	RR/RP (current zoning)
Residential Uses		
• Single family dwelling, detached	X	X
• Mixed use development	ACUP	X
• Hotel/motel	C	X
Commercial/Business Uses		
• Financial, banking, mortgage and title institutions	P	X
• General office and management services – 4,000 to 9,999 s.f.	ACUP	X
• General retail merchandise stores – less than 4,000 s.f.	P	X
• General retail merchandise stores – 10,000 to 24,999 s.f.	C	X
• General retail merchandise stores – 25,000 s.f. or greater	X	X
• Restaurants	P	X
• Tourism facilities, including outfitter and guide facilities	X	X

Legend: P = Permitted, X = Prohibited, ACUP = Administrative Conditional Use, C = Conditional Use

Zoning development standards show a denser pattern of development for NC than for RR/RP. For example, mixed use development at 10-30 units per acre is allowed in the NC zone whereas single family residential development at 1 unit per 5 or 20 acres is allowed in the RR/RP zones respectively.

Exhibit 3. Selected Development Standards Comparison (KCC 17.381.040)

Density and Dimensions	NC (proposed zoning)	RR/RP (current zoning)
Base density (du/acre)	10	1 Unit/5 Acres (RR) 1 Unit/10 Acres (RP)
Maximum Density (du/acre)	30	NA
Minimum lot size (acre)	NA	NA
Lot width (feet)	NA	140
Lot depth (feet)	NA	140
Maximum height (feet)	35	35

PUBLIC COMMENTS

Three tribal and agency comments were received regarding the proposal during the SEIS public comment period. The Suquamish Tribe, Point No Point Treaty Council and the Washington Department of Fish and Wildlife do not support the proposal due to the expansion of a Type I LAMIRD and environmental constraints. The easterly portion of the subject parcel contains wetlands associated with Grovers Creek, which drains to Miller Bay where the Suquamish Tribe operates a Chinook and chum salmon hatchery. The Tribe's comment letter describes recent monitoring efforts associated with the creek and hatchery, and states concern regarding potential further degradation of Grovers Creek (including fish passage opportunity) if wetland, riparian and stormwater protection functions are not maintained throughout the Grovers Creek watershed.

EVALUATION

Site specific reclassification requests to the Comprehensive Plan must be reviewed in accordance with the criteria outlined in the Kitsap County Code (KCC) Chapter 21.08. Applicable review criteria for site specific reclassification requests are in sections KCC 21.08.070.A and KCC 21.08.070.D.

General Criteria (KCC 21.08.070.A)

A. General. For each proposed amendment to the Comprehensive Plan the review authority, the planning commission in reaching its recommendation, and the board of commissioners in making its decision, shall develop findings and conclusions, which demonstrate:

1. How circumstances related to the proposed amendment and/or the area in which the property affected by the proposed amendment is located have substantially changed since the adoption of the Comprehensive Plan or applicable development regulations;

Circumstances related to the proposed amendment or the area in which the property is located have not substantially changed since adoption of the Comprehensive Plan.

2. How the assumptions upon which the Comprehensive Plan is based are no longer valid, or there is new information available which was not considered during the adoption of, or during the last annual amendment to, the Comprehensive Plan or development regulations; and

The assumptions upon which the Comprehensive Plan is based are still generally valid. Updated growth targets and capacity analysis is being conducted as part of the 2016 Comprehensive Plan update, but in general that process will not change the assumptions relative to the subject property and proposed amendment.

3. How the requested redesignation is in the public interest and the proposal is consistent with the Kitsap County Comprehensive Plan.

The amendment request is not in the public interest as it would expand the logical outer boundary of the existing Type I LAMIRD boundary to include an undeveloped forested property with significant environmental constraints and building limitations. See analysis under criteria 1.f below for consistency with the Comprehensive Plan.

Reclassification Request Criteria (KCC 21.08.070.D)

D. Site-Specific Amendments. In addition to the findings and conclusions in subsection (A) of this section, a proposed site-specific map amendment may be recommended for approval by the planning commission and may be approved by the board of commissioners if the following findings are made:

1. All Site-Specific Amendment Requests. Each of the following requirements must be satisfied for a recommendation for approval.

- a. The proposed amendment meets concurrency requirements for transportation, sewer and water, and will not result in significant adverse impacts on adopted level of service standards for other public facilities and services, such as police, fire and emergency medical services, park services, and general government services;**

The proposed amendment involves expanding a LAMIRD boundary to include an additional 8.36 acres of undeveloped property that contains wetlands and moderate geologic hazard areas. The LAMIRD area currently has water service, but not sanitary sewer. While the expansion of the LAMIRD would not significantly impact levels of service for public services overall within the County, it would expand the area that may be served by more intense public services ~~is to be served by urban services~~ and increase the area that is to be served. The area is studied cumulatively for NC in the 2016 Comprehensive Plan Update SEIS. The site is located near segments of Hansville Road NE and SR 104 with projected transportation deficiencies under Alternative 3. Increased commercial density at the proposed site would add trips beyond what was reflected in the 2036 travel demand forecasts. Therefore, the proposal would result in an impact to transportation. However, the transportation improvement projects identified to address deficiencies expected without the proposal would also be expected to address the additional impacts resulting from the proposal. Any reclassification proposal would be subject to a more specific analysis of transportation impacts and would be subject to meeting County concurrency requirements at the time of development.

Kitsap County has submitted this application to the Washington State Department of Transportation for their review and comment, as the site is located on a state highway.

- b. The proposed amendment is consistent with the balance of the goals, policies and objectives of the current Kitsap County Comprehensive Plan and reflects the local circumstances of the County;**

Kitsap County Comprehensive Plan Chapter Vision

Kitsap County’s Comprehensive Plan shows the relationship between chapter concepts and the comprehensive plan vision. See Exhibit 4.

Exhibit 4. County Vision for Rural and Urban Areas

Vision	Rural Chapter Relationship to Vision
<p>Rural Areas. Rural areas and communities where unique historical characters, appearances, functions, and pioneering spirits are retained and enhanced. Natural resource activities, such as forestry, agriculture, and mining continue to contribute to the rural character and economy. Rural recreation opportunities are enhanced, including equestrian facilities, trails, and others.</p>	<ul style="list-style-type: none"> • Maintain low residential densities in rural areas and provides policy guidance for development standards which help to preserve the County’s rural character. Foster small sustainable farms and agricultural enterprises that provide locally-grown food and fiber for Kitsap citizens.
<p>Economic Development. A stable, prosperous and diversified economy that provides living wage jobs for residents, supported by adequate land for a range of employment uses and that encourages accomplishment of local economic development goals.</p>	<ul style="list-style-type: none"> • Preserve opportunities for resource-based economic activities within the County. • Allow for limited commercial and industrial uses in rural areas, while preserving rural character.

Natural Environment. Natural ecosystems – including interconnected wetlands, streams, wildlife habitat, and water quality – that are rehabilitated, protected, and enhanced and that allow for flexible and innovative development to meet environmental and growth goals. In developed areas, the growth pattern supports conservation of non-renewable energy and minimizes impacts on air quality and climate.

Provide for protection of natural ecosystems in rural areas through rural designations, through compliance with Kitsap County “Water as a Resource” Policy (Res.109-2009), and with lower levels of development and lower availability of public services.

Source: Kitsap County Comprehensive Plan (December 2012).

Expanding the Type I LAMIRD Boundary and up zoning 8.36 acres of undeveloped property with significant wetlands appears contrary to the vision statement with respect to the natural environment. The proposed action would also alter the logical outer boundary of the LAMIRD and could affect the local character which currently has a visual separation between the LAMIRD and abutting rural large lots to the east and south. While at least one Growth Management Hearing Boards has stated that the LOB for a Type I LAMIRD may conceivably be enlarged after its initial establishment, such an expansion must meet the same criteria as required for the initial establishment. *1000 Friends of Washington v. Snohomish County*, CPSGMHB Case No. 03-3-0026, (*1000 Friends II*), FDO, (June 21, 2004). There is no evidence that the addition of this property to the LAMIRD meets the criteria for establishing the initial boundary. There is no evidence that this property included pre-existing development prior to 1990. Under GMA, the purpose of establishing LAMIRDs is to limit development, adding vacant parcels at the fringes of an established LAMIRD could contravene the GMA provisions.

Kitsap County Comprehensive Plan 2036 Goals and Policies: Chapter 3

The proposed zoning amendment supports the following current Comprehensive Plan Goals:

3A.2.1B Limited Areas of More Intensive Rural Development

- Goal 7. Allow for the designation of LAMIRDs outside of the UGA based on existing rural residential communities or villages, areas of mixed use activity, isolated areas of small and moderate-scale commercial/industrial activity, and historic towns.
- **Policy RL-25 Prohibit designating a LAMIRD adjacent to an UGA.**

The subject properties are adjacent to a Type I LAMIRD, but not adjacent to a UGA. The area was evaluated as part of LAMIRD options in 2004 and the present boundary that excludes the site was established and upheld by the Growth Management Hearings Board.

- **Policy RL-27 Encourage changes to zones in LAMIRDs to occur via a local community planning process. This process should incorporate local knowledge, experience and preferences to determine appropriate area-specific land uses, development standards, design guidelines, and public service needs. Specific issues that should be considered in this planning process include:**

- **Appropriate logical outer boundaries as required by GMA**

The appropriate logical outer boundary of the existing George’s Corner LAMIRD was subject to review by the Growth Management Hearings Board in 2005 and upheld. The proposed amendment would expand the logical outer boundary to undeveloped forested land that contains wetlands and a stream corridor. Therefore, extending the appropriate logical outer boundary to include the subject property appears unjustified.

- **Rural character of the subject area and surrounding area.**

The subject property and surrounding area with an RR/RP designation maintain a rural character. Applying the NC designation to the subject property, which is undeveloped and contains relatively intact ecological functions would affect rural character incrementally.

- **Appropriate mix of uses, densities and intensities.**

The specific mix of uses, densities and intensities allowed in the NC zone are appropriate for properties within the LAMIRD boundary. However, as discussed above the extension of the logical outer boundary to include the subject property is not supported by GMA goals and local regulations and so, therefore, is not an appropriate mix of uses, densities and intensities.

- **Feasibility, cost and need for public services.**

The site is served with public water service, but not sanitary sewer service.

- **Significant natural constraints or features to be preserved.**

The subject property is undeveloped forested land that contains wetlands and a stream corridor, both regulated under Kitsap County Code Title 19 (Critical Areas) which responds to state requirements for local governments to protect the functions and values of critical areas and their buffers

- **Provision for a monitoring and evaluation process.**

As a condition of approval if the request is approved, the County should work with the applicant to develop a monitoring and evaluation process.

- **Benefits to the local community.**

The benefits of approving the request may include allowing greater commercial opportunities at the crossroads for the Kingston-area community; given the preference in County plans for focus growth in the Kingston UGA and other UGAs, and the environmental and rural character concerns, the benefits of expanding the George's Corner LAMIRD do not appear to outweigh the disadvantages. The applicant has not demonstrated any benefits to the local community. The subject parcel(s) is suitable for the requested land use designation based upon, but not limited to, access, provision of utilities, consistency with existing and planned uses, environmental constraints and compatibility with the neighborhood. However, the subject parcel is not suitable for the requested land use designation based on environmental constraints and is inconsistent with the GMA criteria for establishing the logical outer boundary of the LAMIRD.

c. The proposed amendment does not materially affect the land uses and growth projections which are the basis for comprehensive planning, and reflects local circumstances in the county;

The proposed amendment does not materially affect the land uses and growth projections which are the basis for comprehensive planning and reflects local circumstances in the County.

d. The proposed amendment does not materially affect the adequacy or availability of urban facilities and services to the immediate area or the overall area of the urban growth area;

The proposed amendment does not materially affect the adequacy or availability of urban facilities and services to the immediate area or the overall are of the urban growth area. See criteria D.1.a.

e. The proposed amendment is consistent with the GMA, Kitsap County-wide Planning Policy, state and local laws and other applicable inter-jurisdictional policies or agreements.

The following state and local policies and laws are applicable to the applicant's zoning amendment request.

Growth Management Act Planning Goals (RCW 36.70a.020)

(10) Environment. Protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.

The proposed amendment is inconsistent with above GMA goal by expand the boundary of a LAMIRD to an undeveloped forested site with environmental constraints.

Growth Management Act – Designating Limited Areas of More Intense Development (RCW 36.70A.070(5)(d))

The GMA establishes the criteria for establishing the logical outer boundary for a LAMIRD in RCW 36.70A.070(5)(d)(iv) and (v):

The county shall establish the logical outer boundary of an area of more intensive rural development. In establishing the logical outer boundary, the county shall address (A) the need to preserve the character of existing natural neighborhoods and communities, (B) physical boundaries, such as bodies of water, streets and highways, and land forms and contours, (C) the prevention of abnormally irregular boundaries, and (D) the ability to provide public facilities and public services in a manner that does not permit low-density sprawl;

(v) For purposes of (d) of this subsection, an existing area or existing use is one that was in existence:

(A) On July 1, 1990, in a county that was initially required to plan under all of the provisions of this chapter;

The subject property was not developed prior to July 1, 1990. Expanding the outer logical boundary on the edge of the LAMIRD to include undeveloped forested land that includes significant environmental constraints appears contrary to the criteria above. (e.g. using bodies of water, land forms and contours to define boundaries).

Kitsap County-wide Planning Policies

Element D: Rural Land Uses and Development Patterns

D-2. Preserving rural land use and development patterns:

- a. **Rural Communities are already-existing residential and commercial areas of more intensive rural development designated in the Kitsap County Comprehensive Plan under RCW 36.70A.070.5. In-fill is expected. Rural Communities should be serviced by transportation providers and other services consistent with the Levels of Service adopted by Kitsap County for roads and by Kitsap Transit for transit upon their designation as an area of more intensive rural development.**

The proposed amendment is inconsistent with the above County-wide Planning Policy because it is not part of the already developed area within the existing Type I LAMIRD and would require the extension of the logical outer boundary to include undeveloped forested land with environmental constraints.

3. Rural Commercial/Industrial and Type III LAMIRD Site-Specific Amendment Requests. Each of the following requirements must be satisfied for a recommendation for approval.

a. Demonstration of an unmet need for the proposed land use designation in the rural area.

No unmet need has been identified by the applicant. The applicant stated an intent to develop a fast-food establishment or similar type land use if the amendment request is approved.

b. Demonstration that Kitsap County's rural character will be preserved or unaffected by the change of designation.

The subject property is undeveloped forested land that is along the outer boundary, but outside, of the Type I LAMIRD Boundary. The proposed amendment would increase the likelihood that the subject property is developed at urban intensities that may negatively impact the rural character in the County. See the description of rural character under "Present Comprehensive Plan Designations."

c. Demonstration that the proposed designation will principally serve the rural area.

It is likely this site would provide commercial uses at the cross roads to serve north Kitsap County. However, there are other already developed areas in the LAMIRD and in the Kingston UGA that could fill that need.

d. Demonstration that appropriate rural services are available (i.e., water, wastewater disposal, etc.) and that urban services will not be required for the proposed designation.

See Response D.1.a.

e. Demonstration that the proposal is contiguous to existing industrial or commercial zoning. (Exceptions to this policy must demonstrate a unique or exceptional need for the proposed land use designation.)

The site abuts other NC properties to the north and west. However, there is no exceptional or unique need to add this property in light of the logical outer boundary requirements for Type I LAMIRDs.

f. Demonstration that the property is sized appropriately for the proposed land use designation.

The site is constrained and would not allow for significant added commercial uses without creating potential significant environmental impacts, and there are other opportunities in the LAMIRD and Kingston UGA to add commercial uses.

g. Demonstration that there is a lack of appropriately designated and available sites within the vicinity.

The applicant has not demonstrated a lack of available sites. In fact there are 3 vacant lots currently within the LAMIRD, one 6.85 acres in size. The Comprehensive Plan intends to focus growth in UGAs. LAMIRDs are only provided to recognize existing development not to create added capacity for growth.

Findings of Fact

1. The applicant, Bill Broughton, submitted the application to Kitsap County on February 2, 2015.
2. The applicant seeks a Comprehensive Plan Amendment to change the Comprehensive Plan Map Designation from Rural Residential (RR) and Rural Protection (RP) to Low-Intensity Commercial/Mixed-Use. This would also entail an expansion of the Logical Outer Boundary of the George's Corner Type I LAMIRD.

3. The applicant seeks a Zoning Map Amendment from Rural Residential (RR) and Rural Protection (RP) to Neighborhood Commercial and to extend the adjacent Type I LAMIRD boundary to include the subject property.
4. The subject property is located near the corner of Miller Bay Rd. NE and NE State Highway 104.
5. The subject property is adjacent to the George's Corner Type I LAMIRD to the west and properties zoned Neighborhood Commercial (NC).
6. The subject property is currently undeveloped.
7. The subject property has environmental constraints including wetlands and a stream corridor.
8. The subject property was not developed prior to July 1, 1990.
9. The Logical Outer Boundary (LOB) of the adjacent Type I LAMIRD was reviewed and upheld by the Growth Management Hearings Board in 2005. Any change to the LOB must comport with the same criteria as the initial designation was subject to.

Conclusion of Law

The application is inconsistent with the Washington Growth Management Act, the Kitsap Countywide Planning Policies, the Kitsap County Comprehensive Plan, and other state and local regulations.

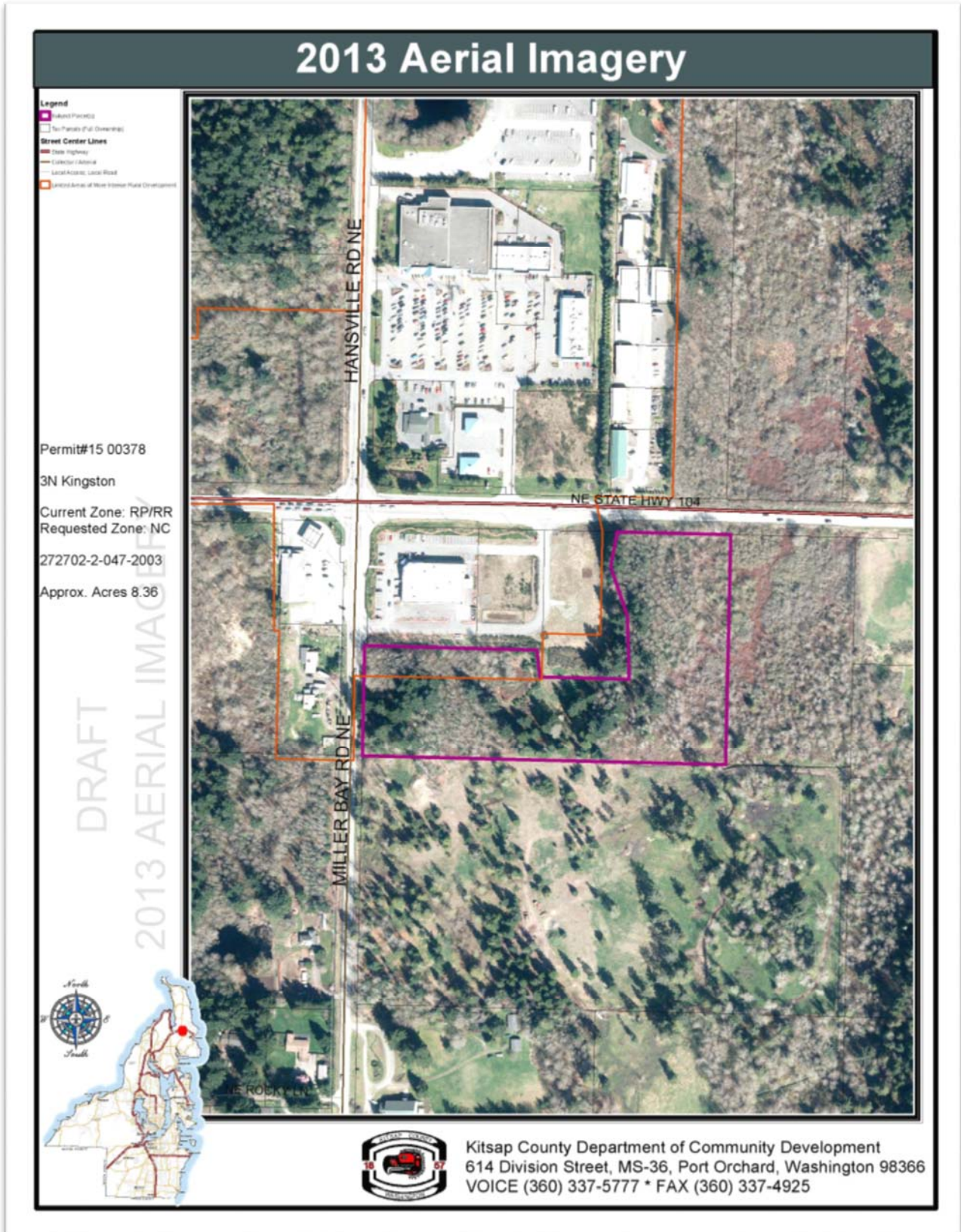
Recommendation

Based on the findings of fact and conclusion of law staff recommends denial of application #15 00378.

In order to be consistent with the adopted LAMIRD plan and to correct the noted split zones created by the above referenced short plat, staff recommends parcel 272702-2-047-2003 be rezoned entirely to RP and the remaining residential portion of parcel 272702-2-046-2004 be RP.

ATTACHMENTS

Attachment 1. Aerial Imagery



Attachment 3. Current Land Use

