II. EXECUTIVE SUMMARY

A. INTRODUCTION

As required by CEQA Guidelines Section 15123, this executive summary provides a brief description of the proposed Project, areas of known controversy, and unresolved issues. The executive summary also identifies which environmental impacts associated with the proposed Project are significant, what specific mitigation measures have been identified to reduce or avoid each significant impact, and the level of significance of the impact after mitigation. This executive summary is intended as an overview and should be used in conjunction with a thorough reading of the Draft EIR. The text of this Draft EIR, including figures, tables, and appendices serve as the basis for this executive summary.

B. SUMMARY OF PROPOSED PROJECT

As described in more detail in Section III (Project Description) of this Draft EIR, the proposed Project consists of a new 491,040-square foot tilt-up concrete creative industrial building with two supporting offices at 1000 Gibraltar Drive in the City of Milpitas. Approximately 486,130 square feet of warehouse and 4,910 square feet of office space is proposed. The proposed building has been designed to accommodate up to two separate tenants with proposed uses including Advanced Manufacturing, E-Commerce, Light Assembly, Warehouse/Distribution, and possibly other uses permitted within the City's Industrial (M2) zone.

C. AREAS OF KNOWN CONTROVERSY/ISSUES TO BE RESOLVED

Section 15123 of the CEQA Guidelines requires an EIR to identify areas of controversy known to the lead agency, including issues raised by agencies and the public, and issues to be resolved. Environmental topics raised during the scoping process include:[1]

- Tree removal
- Zoning and land use compatibility
- Traffic and vehicle miles travelled (VMT)
- Nesting birds
- Air Quality

[1] *Refer to Appendix B of the Draft EIR for all of the comments submitted during the Draft EIR scoping process.*

D. SUMMARY OF ALTERNATIVES TO THE PROPOSED PROJECT

Section 15123 of the CEQA Guidelines requires an EIR to identify each significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect. The CEQA Guidelines further require EIRs to include the identification and evaluation of a reasonable range of alternatives that are designed to reduce the significant environmental impacts of the Project while still meeting the general project objectives. Refer to Section VI (Alternatives to the Proposed Project) of this Draft EIR for an analysis of the alternatives in comparison to the proposed Project. The alternatives analyzed in comparison to the proposed Project include:

Alternative A No Project Alternative

Alternative B Reduced Project Alternative

E. APPROVAL CONSIDERATIONS

This Draft EIR was prepared in accordance with CEQA to evaluate the potential environmental impacts associated with the proposed Project (State Clearinghouse No. 2020069024). This document was prepared in conformance with CEQA (California Public Resources Code, Section 21000, et seq.) and the CEQA Guidelines (California Code of Regulations, Title 14, Section 15000, et seq.), and the City of Milpitas policies, standards, and procedures. The purpose of this Draft EIR is to inform decision makers, representatives of affected and responsible agencies, the public, and other interested parties of the potential environmental effects that may result from implementation of the proposed Project. This Draft EIR describes potential impacts relating to a wide variety of environmental issues and methods by which these impacts can be mitigated or avoided. As described above, pursuant to the CEQA Guidelines, this Draft EIR also describes various alternatives designed to reduce or avoid environmental impacts.

After considering the Draft EIR, along with any changes to the Draft EIR and response to comments made in the Final EIR, the City of Milpitas Planning Commission will determine whether to approve the proposed Project or an alternative to the proposed Project. The Planning Commission will also determine the mitigation measures that can feasibly lessen the significant impacts of the project or alternative that is selected for approval.

F. SUMMARY OF SIGNIFICANT ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Table II-1 summarizes the various significant environmental impacts associated with the proposed Project that are analyzed in detail in the Draft EIR. Table II-1 also includes mitigation measures to reduce or avoid significant environmental impacts and identifies the level of impact significance after mitigation.

Table II-1
Summary of Significant Environmental Impacts and Mitigation Measures

Significant Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
AESTHETICS		
Impact AES-1: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area	**Mitigation Measure AES-1:** Outdoor lighting shall be designed to minimize glare and spillover to surrounding properties. The project design and building materials shall incorporate non-mirrored glass to minimize daylight glare. All lighting elements shall comply with Sections XI-10-54.17 of the City's Zoning Code and the proposed lighting plan shall be reviewed and approved by the City's Planning Department prior to issuance of a building permit.	*Less Than Significant*
AIR QUALITY		
Impact AIR-2: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard	**Mitigation Measure AIR-1: Tenant-Owned Vehicle Model Year Requirement** At the beginning of Project tenancy, the Project Applicant shall submit proof of evidence to the City of Milpitas that any tenant-owned vehicles above 14,000 pounds gross vehicle weight rating (GVWR) accessing the Project site are solely powered by 2010 or newer engine models. Proof of evidence can include, but is not limited to: Department of Motor Vehicles registration records; emission control labels on individual vehicles; or records from Truck Regulation Up-load, Compliance, and Reporting System (TRUCRS). Compliance shall end in 2024. **Mitigation Measure AIR-2: Emission Offsets** For Project operation in 2022, the Project Applicant, with the oversight of City of Milpitas Planning Department, shall implement either of the following two options or a combination of both: 1. Directly implement a specific offset program (such as requiring Project tenant(s) to replace equipment in the existing tenant-owned operation fleet) to achieve a total annual reduction of 1.8 tons of NOx, subject to the City of Milpitas Planning Department's	*Significant and Unavoidable*

Significant Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
	approval. To qualify under this mitigation measure, the specific emissions offset Project must result in emissions reductions within the San Francisco Bay Area Air Basin that are real, surplus, quantifiable, enforceable, and would not otherwise be achieved through compliance with existing regulatory requirements or any other legal requirement. Prior to implementation of the offset projects, the Project Applicant must obtain Planning Department's approval of the proposed offset projects by providing documentation of the estimated 1.8 tons of annual NOx reduction within the San Francisco Bay Area Air Basin. The Project sponsor shall notify the Planning Department within six months of completion of the offset projects for verification. 2. Pay a mitigation offset fee to the Bay Area Air Quality Management District's (BAAQMD) Bay Area Clean Air Foundation (Foundation) in an amount to be determined at the time of the impact. The mitigation offset fee will be determined by the Planning Department in consultation with the Project Applicant and BAAQMD, and will be based on the type of projects available at the time of impact. This fee is intended to fund emissions reduction projects to achieve an annual reduction of 1.8 tons of NOx. For this option, the Project Applicant is required to enter into a Memorandum of Understanding (MOU) with the BAAQMD's Foundation. The MOU will include details regarding the funds to be paid, administrative fee and the timing of the emissions reductions project. Acceptance of this fee by the BAAQMD shall serve as an acknowledgement and commitment by the BAAQMD to: (1) implement an emissions reduction project(s) with a time frame to be determined based on the type of project(s) selected, after receipt of the mitigation fee to achieve the emission reduction objectives specified above; and (2) provide documentation to the City of Milpitas Planning Department and the Project Applicant describing the amount of mitigation fee and the project(s) funded	

Significant Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
	by the mitigation fee, including the amount of emissions of NOx reduced (tons) within the San Francisco Bay Area Air Basin from the emissions reduction project(s). If there is any remaining unspent portion of the mitigation fee following implementation of the emission reduction project(s), the Project Applicant shall be entitled to a refund in that amount from the BAAQMD. To qualify under this mitigation measure, the specific emissions reduction project must result in emission reduction within the San Francisco Bay Area Air Basin that are real, surplus, quantifiable, enforceable, and would not otherwise be achieved through compliance with existing regulatory requirements or any other legal requirement.	
Impact AIR-3: Expose sensitive receptors to substantial pollutant concentrations	**Mitigation Measure AIR-3: Fugitive Dust Control during Project Construction** During Project construction, the contractor shall implement a dust control program that includes the following measures recommended by the Bay Area Air Quality Management District (BAAQMD): • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. • All haul trucks transporting soil, sand, or other loose material off-site shall be covered. • All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. • All vehicle speeds on unpaved roads shall be limited to 15 miles per hour. • All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.	*Less Than Significant*

Significant Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
	• A publicly visible sign shall be posted with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD phone number shall also be visible to ensure compliance with applicable regulations. The above measures shall be included in contract specifications. In addition, an independent construction monitor shall conduct periodic site inspections, but in no event less than four total inspections, during the course of construction to ensure these mitigation measures are implemented and shall issue a letter report to the City of Milpitas Building Division documenting the inspection results. Reports indicating non-compliance with construction mitigation measures shall be cause to issue a stop work order until such time as compliance is achieved.	
BIOLOGICAL RESOURCES		
Impact BIO-1: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites	**Mitigation Measure BIO-1 Nesting Birds:** If feasible, all vegetation removal shall be conducted during the non-breeding season (i.e., September 1 to January 31) to avoid direct impacts to nesting birds. If such work is scheduled during the breeding season, a qualified biologist or ornithologist shall conduct a pre-construction survey to determine if any birds are nesting within the project site. The pre-construction survey shall be conducted within 15 days prior to the start of work from March through May (since there is a higher potential for birds to initiate nesting during this period) and within 30 days prior to the start of work from June through July. If active nests are found during the survey, the biologist or ornithologist shall determine an appropriately sized buffer around the nest in which no work shall be allowed until the young have successfully fledged. The size of the buffer shall be determined by the biologist or ornithologist in consultation with the California Department of Fish and Wildlife, and would be based on the nesting species, its sensitivity to disturbance, and the expected types of disturbance.	*Less Than Significant*

Significant Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
CULTURAL RESOURCES		
Impact CULT-1: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5	**Mitigation Measure CULT-1 – Unanticipated Discovery Protocol for Archaeological Resources:** If indigenous or historic-era archaeological resources are encountered during proposed Project development or operation, all activity within 100 feet of the find shall cease and the find shall be flagged for avoidance. The City and a qualified archaeologist, defined as one meeting the U.S. Secretary of the Interior's Professional Qualifications Standards for Archeology, shall be immediately informed of the discovery. The qualified archaeologist shall inspect the find within 24 hours of discovery and notify the City of their initial assessment. If the resource is indigenous, the City shall also contact relevant California Native American Tribes to assist in determining if the resource may qualify as a tribal cultural resource. If the City determines, based on recommendations from the qualified archaeologist and, if the resource is indigenous, relevant California Native American Tribes, that the resource may qualify as a historical resource or unique archaeological resource (as defined in CEQA Guidelines § 15064.5), or a tribal cultural resource (as defined in PRC § 21074), the resource shall be avoided if feasible. Avoidance means that no activities associated with the proposed Project that may affect cultural resources shall occur within the boundaries of the resource or any defined buffer zones. If avoidance is not feasible, the City shall consult with appropriate Native American tribes (if the resource is indigenous) and other appropriate interested parties to determine treatment measures to avoid, minimize, or mitigate any potential impacts to the resource pursuant to Public Resources Code § 21083.2 and CEQA Guidelines § 15126.4. This shall include documentation of the resource and may include data recovery or other measures. Treatment for most resources would consist of, but would not be limited to, sample excavation, artifact collection, site documentation, and historical research, with the aim to target the recovery of important scientific data contained in the portion(s) of the significant resource. The resource and treatment method shall be documented in a	*Less Than Significant*

Significant Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
	professional-level technical report to be filed with the California Historical Resources Information System. Work in the area may commence upon completion of approved treatment and under the direction of the qualified archaeologist.	
Impact CULT-2: Disturb any human remains, including those interred outside of dedicated cemeteries	**Mitigation Measure CULT-2 – Unanticipated Discovery Protocol for Human Remains:** If human remains are uncovered during proposed Project construction, all work shall immediately halt within 100 feet of the find and the Santa Clara County Coroner shall be contacted to evaluate the remains and follow the procedures and protocols set forth in CEQA Guidelines § 15064.5(e)(1). If the Santa Clara County Coroner determines that the remains are Native American, the City shall contact the Native American Heritage Commission (NAHC), in accordance with Health and Safety Code § 7050.5(c) and Public Resources Code § 5097.98. As required by Public Resources Code § 5097.98, the City shall ensure that further development activity avoids damage or disturbance in the immediate vicinity of the Native American human remains, according to generally accepted cultural or archaeological standards or practices, until the City has conferred with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.	*Less Than Significant*
GEOLOGY AND SOILS		
Impact GEO-1: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature	**Mitigation Measure GEO-1:** The applicant shall inform its contractor(s) of the sensitivity of the project area for paleontological resources and shall include the following directive in the appropriate contract documents. The City shall verify that the following directive is included in the appropriate contract documents: "The subsurface of the construction site may be sensitive for paleontological resources. The contractor shall provide information to construction crews on how to recognize paleontological resources. If paleontological resources are encountered during project subsurface	*Less Than Significant*

Significant Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
	construction, all ground disturbing activities within 25 feet of the find shall be redirected and the City and a qualified paleontologist contacted to assess the paleontological resources. Project personnel shall not collect or move any paleontological materials. Paleontological resources include fossil plants and animals, and such trace fossil evidence of past life as animal tracks." The City and a qualified paleontologist shall make recommendations for the treatment of the discovery. If found to be significant, and project activities cannot avoid the paleontological resources, adverse effects to paleontological resources shall be mitigated. Mitigation may include monitoring, recording the fossil locality, data recovery and analysis, preparation of a technical report, and providing the fossil material and technical report to a paleontological repository, such as the University of California Museum of Paleontology. Public educational outreach may also be appropriate. Upon completion of the assessment, a report documenting methods, findings, and recommendations shall be prepared and submitted to the City for review.	
GREENHOUSE GAS EMISSIONS		
Impact GHG-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment	**Mitigation Measure GHG-1: Greenhouse Gas Reduction Plan:** As a part of the application package for construction-related permits, the Project Applicant shall prepare a GHG Reduction Plan to demonstrate that the Project's GHG emissions per employee would be below the interim 2030 GHG threshold (2.9 metric tons carbon dioxide equivalent per service population) with the implementation of GHG reduction measures. Applicable GHG reduction measures include the following options: • Implementation of the Transportation Demand Management ("TDM") Plan, described in Mitigation Trans-1;	*Significant and Unavoidable*

Significant Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
	• Increase installation of Level 2 charging stations from 22 to 37; Provide conduit for 50 EV charging stations either at the dock doors on in the truck court for future EV trucks; • Site employers who own and operate truck fleets shall be required to inform their drivers of the anti-idling requirement; • Future industrial operations shall prohibit idling of on-and-off road heavy-duty diesel vehicles for prolonged periods; and • The Project will commit to using 10% of renewable energy sources. Other applicable GHG reduction measures that may be feasible include, but are not limited to, the following options: • Eliminating idling emissions from trucks and vans by providing electrical connections at the Project site (up to 9 percent reduction in total GHG emissions) for trucks with refrigeration units (TRU's) and require that all electric-capable TRU's utilize the connections when in use; • Eliminating natural gas use at the Project site (approximately 3 percent reduction in total GHG emissions); • Enroll in the program to purchase Silicon Valley Clean Air Energy Certificates; • Installation of solar panels on Project Site where 10% of the project's power is from solar panels; • Other applicable action items included in the City of Milpitas	

Significant Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
	Climate Action Plan; and • Concrete Truck courts to reduce Heat Island effect. For physical GHG reduction measures to be incorporated into the design of the Project, the measures shall be included on the drawings submitted for construction-related permits. If, after exhaustion of feasible physical design features and operational features specific to the Project, the Project's GHG emissions would still exceed the 2030 threshold, discussed above, the Project shall include the purchase of carbon credits as a reduction measure. The amount of carbon credits shall at least cover the difference between the interim 2030 threshold and the Project's GHG emissions after the consideration of design features, to be determined in the GHG Reduction Plan. The cost of carbon credit purchases shall be based on current market value at the time purchased and shall be based on the Project's operational emissions estimated in the GHG Reduction Plan or subsequent approved emissions inventory, which may result in emissions that are higher or lower than those estimated in the GHG Reduction Plan. All carbon credits shall be purchased from a carbon offset registry (the registry) approved by CARB. The carbon credit shall be verifiable by the City of Milpitas and enforceable in accordance with the registry's applicable standards, practices, or protocols. The purchase of the carbon credits must substantively satisfy the requirements set forth in both subdivisions (d)(1) and (d)(2) of California Health and Safety Code §38562: real, permanent, quantifiable, verifiable, enforceable, and additional. The purchase of the carbon credits shall be approved by the City of Milpitas, and verified by an independent verifier who meets stringent levels of professional qualification (i.e., Accreditation Program for	

Significant Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
	GHG Validation/Verification Bodies under the American National Standards Institute's National Accreditation Board, a GHG Emissions Lead Verifier accredited by CARB, or equivalent). The amount of the carbon credits and the locations of the GHG-reducing programs generating these carbon credits shall be determined in accordance with the following preferences: 1. Off-site within the immediate neighbourhood surrounding the Project site, bounded by West Calaveras Boulevard to the north, Interstate 680 to the east, Montague Expressway to the South, and Interstate 880 to the west; 2. Within the City of Milpitas; 3. Within the San Francisco Bay Area Air Basin; and 4. Within the State of California.	
HAZARDS AND HAZARDOUS MATERIALS		
Impact HAZ-1: Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment	**Mitigation Measure HAZ-1:** A Soil Management Plan (SMP) shall be prepared by a qualified environmental professional to outline soil management protocols that would be implemented during Project construction to ensure that construction workers, the public, future site occupants, and the environment would not be exposed to hazardous materials (e.g., arsenic) that may be present in soil at the Project site. The SMP shall be submitted to the City for review and approval prior to issuance of demolition or grading permits. The SMP shall include, but not be limited to the following: • Procedures for soil management including identification and testing of contaminants, soil stockpiling procedures, soil reuse guidelines, and soil disposal methods.	*Less Than Significant*

Significant Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
	• Requirements for notification to the City and any applicable regulatory agency(ies) of previously unknown hazardous materials found in soil during development. • Guidelines for controlling dust during excavation and grading. All recommendations included in the SMP shall be implemented during the demolition, grading, and construction phase of the Project. Prior to the City's approval of building occupancy, the applicant shall provide the City with a report prepared by a qualified environmental professional documenting that soils on the Project site were managed in accordance with the SMP during demolition, grading, and construction, and that appropriate safeguards (e.g., capping of remaining arsenic impacted soil with clean fill or hardscape materials) have been incorporated into the project design, as necessary, to ensure that the public, future site occupants, and the environment would not be exposed to unacceptable health risks from residual hazardous materials in the subsurface of the Project site.	
TRANSPORTATION		
Impact TRANS-2: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	**Mitigation Measure TRANS-1:** The Project applicant shall implement a travel demand management program for all employees with the goal of reducing the use of single-occupant vehicles for commuting. The measures most likely to be effective given the Project's location and expected use type include the following (measures are identified with the California Air Pollution Control Officers (CAPCOA) *Quantifying Greenhouse Gas Mitigation Measures* (August 2010) measure number and VMT reduction effectiveness range): • Implement a commute trip reduction program with required implementation and monitoring (CAPCOA measure TRT-2, effectiveness range 4.2% - 21.0%); • Provide ride-sharing programs (CAPCOA measure TRT-3, effectiveness range 1 – 15%);	*Significant and Unavoidable*

Significant Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
	• Implement subsidized or discounted transit program (CAPCOA measure TRT-4, effectiveness range 0.3% - 20%); • Provide end-of-trip facilities (CAPCOA measure TRT-5, effectiveness based on effectiveness of measures TRT-2 and TRT-3); • Implement commute trip reduction marketing (CAPCOA measure TRT-7, effectiveness range 0.8% - 4.0%); • Implement car-sharing program (CAPCOA measure TRT-9, effectiveness range 0.4% - 0.7%); • Restripe Green Bike lanes along property frontage; and • Bike locker subsidy. (a) VMT Strategy Report • Prior to the issuance of an occupancy permit, the Project Applicant (or Project site operator) shall prepare a VMT Strategy Report that includes the following items: • Identification of a baseline Project home-based work VMT per employee estimate, which may be taken from this EIR or updated based on more detailed/relevant Project information available at the time of the preparation of the VMT Strategy Report. • Identification of selected TDM strategies per the above list, and others if appropriate. • Demonstration of how the VMT generated by the Project would be 15 percent below the countywide average home-based work VMT per employee.	

Significant Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
	• After implementing the TDM strategies selected in the VMT Strategy Report upon occupancy of the Project, the effectiveness of these measures relative to the performance target noted previously must be monitored, as follows. (b) Monitoring • The Project shall be monitored by the City or by the Project application/operator on an annual basis to determine the efficacy of the selected TDM strategies in achieving the performance target of 14.31 home-based work VMT per employee. The monitoring shall include project generated VMT estimates compatible with the methodology used to estimate benchmark VMT so that performance comparisons can be made. An annual monitoring memorandum shall be submitted to City staff. If the Project site is found not to be in compliance with the mitigation measure, the Project must incorporate additional TDM strategies to meet the performance target. The Project applicant/operator may propose new strategies that develop over time to further reduce Project generated VMT if substantial evidence is provided to support the efficacy of the strategy. If a 15% VMT reduction is achieved for three consecutive years, the project will no longer need to provide annual reporting.	
Cumulative Impact TRANS-5: Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	**Mitigation Measure** See Mitigation Measure TRANS-1 above.	*Significant and Unavoidable*
TRIBAL CULTURAL RESOURCES		
Impact TRIBAL CULT-1: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is	**Mitigation Measure:** See Mitigation Measure CULT-1 and CULT-2 above.	*Less Than Significant*

Significant Environmental Impact	Mitigation Measures	Level of Impact After Mitigation
geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)		
Impact TRIBAL CULT-2: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	**Mitigation Measure:** See Mitigation Measure CULT-1 and CULT-2 above.	*Less Than Significant*