

# **JUSTIFICATION & FINDINGS FOR NOTICE OF EXEMPTION**

## **Kirby Villas TTM 38509, San Jacinto**

The City of San Jacinto has received an Application from Monte Vista Homes for approval of a proposed residential Tentative Tract Map on 4.5 acres at the northwest corner of Esplanade Avenue and Kirby Street (see Figure 1). The proposed TTM would allow for 27 lots for residential use, one lettered lot for water quality basin, and one lot for an existing church, on property described as 1430 South Kirby Street (APN 436-450-015). Fill material at the eastern portion of the site will be used to level the site grade. Excavations for the water quality basin as well as structure footings would not exceed a depth of five feet below ground surface. With an estimated household size of 3.45 persons/household, the project would result in approximately 93 new residents in the City.

The site is generally located Section 32, Township 4 South, Range 1 West depicted on the San Jacinto and Lakeview U.S. Geological Survey's (USGS) 7.5-minute topographic maps. The majority of the property is unused, however, the Valley Community Church currently owns and occupies the property. The church is on the northeast corner of the parcel and the Applicant intends to also include the church as a lot within the TTM.

The parcel is surrounded by existing residential uses to the north and west, and rural residential to the east and south. The area is transforming from rural uses to more intense urban development, particularly within a ½-mile radius around the Project Site.

The Applicant provides justification herein that the project qualifies as an “in-fill exemption” from the California Environmental Quality Act (“CEQA”) as described in the CEQA Guidelines Section 15332. Under CEQA Section 15332, if the Project meets these conditions, it is characterized as in-fill development:

- 1) consistent with the General Plan and Zoning;
- 2) on a site that has no value as habitat for endangered, rare or threatened species;
- 3) is no more than five acres and substantially surrounded by urban uses;
- 4) is adequately served by all required utilities and public services; and
- 5) results in no significant impacts to traffic, noise, air quality, or water quality.

### **In-fill Development Exemption Findings**

#### **Zoning and Land Use**

The Proposed Project is located on a 4.5-acre site within a Medium Density Residential (RM) Zone and is surrounded by properties zoned for residential uses to the north, south, east, and west<sup>1</sup>. The Proposed Project is consistent with the land use designation for the property as shown in the San Jacinto 2040 General Plan, adopted November 15, 2022. The property adjacent to the north of the Project Site has been approved for development of Tract 34664 consisting of 36 residential lots on 5.01 acres. To the southeast is the Hope of the Valley Baptist Church and 0.16 miles to the west is a commercial center. The Proposed Project is adjacent to planned Single Family residential development zoned for varying lot sizes in the City of Hemet to the south (refer to Table 1 below).

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<sup>1</sup> City of San Jacinto Zoning Map. Updated August 29, 2023.

**Table 1**  
Project Site & Surrounding Zoning Designations

| Location      | Zoning  |
|---------------|---|
| Project Site  | Medium Density Residential (RM)                     |
| North         | Medium Density Residential (RM)                     |
| South (Hemet) | Single Family Residential (R-1-7.2) <sup>2, 3</sup> |
| East          | Low Density Residential (RL)                        |
| West          | Low Density Residential (RL)                        |

The San Jacinto 2040 General Plan states that the City has experienced substantial growth over the past 20 years, and how this upward trend is expected to continue into the future. Additionally, land use policies such as LU-2.2 regarding infill developments affirm that the City encourages new developments to occur in infill locations in a balanced and efficient pattern that would reduce sprawl, preserve open space, and create convenient connections to other land uses and activity centers.<sup>4</sup>

The Proposed Project would adhere to the required General Plan policies and regulations and the implementation of residential land uses would be consistent with the Projects surrounding land uses.

**Utilities and Public Services**

The Valley Community Church located on the Project Site, currently receives utilities and public services from both private companies and the City including water, sewer, gas, electric, and phone. Residential developments surrounding the site are also served by existing utilities and public services. There are existing utilities lines in Kirby Street and Esplanade Avenue. The Applicant has had discussions with Southern California Edison, Charter, and Eastern Municipal Water District regarding their ability to serve the 27 additional homes. All service providers have indicated their existing facilities and lines in Kirby and Esplanade would be sufficient to serve the project. EMWD and SCE would provide a backbone loop system from improvements being made for the approved residential tract to the north (TR 34664). Due to recent energy efficiency code changes, there is no plan to provide natural gas to the development.

The Proposed Project would require the provision of public services including police, fire, schools, and recreation. The City of San Jacinto contracts with the Riverside County Sheriff's Department (RCSD) for police services. The police department's primary objective is to provide general law enforcement services to the City, ensuring safety and security for residents throughout the community. The nearest station is located at 160 W Sixth Street, approximately three miles east of the Project Site. The officers to citizen ratio would change from 1:1,422 to 1:1,502 and result in a net change of less than one percent. Given the distance to the Project Site from the station (two miles) and the net change of less than one percent officer to citizen ratio, the Proposed Project would not significantly increase response times.

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<sup>2</sup> City of Hemet. Zoning Map. January 22, 2019.

<sup>3</sup> City of Hemet. Code of Ordinances, Section 90-313. Zones Established. Updated July 18, 2023.

<sup>4</sup> City of San Jacinto 2040 General Plan. Adopted November 15, 2022.

Currently, the Project Site and surrounding area is served by the Riverside County Fire Department Station 25 located at 132 South San Jacinto Avenue, approximately three miles east of the Project Site. The project will require annexation into the Community Facility District (CFD) for safety. It is intended that the same CFD used for TR 34664 will also incorporate this project. The Project would not require the construction of a new fire station to maintain service ratios. Through the implementation of all regulations and City policies for development projects, the Project will have a less than significant impact on fire services.

The City has a broad range of available recreation facilities, programs, and parks. The Project Site and future use as residential was planned as part of the City’s 2040 General Plan update. Therefore, the Project will have a demand for park services which would be covered through the payment of the Park Development Fee required for all new construction.

**Air Quality**

Air Quality emissions were calculated using CalEEMod 2022 for short-term construction phase and operational use associated with 27 single-family residences. Results of the model are provided in Attachment A.

*Construction Emissions*

The emissions calculations for the construction phase of the 27 single-family residences were modeled using South Coast Air Quality Management District (SCAQMD) approved model CalEEMod 2022. Results are shown in Tables 1 and 2. Table 2 is used to disclose construction emissions of GHG. There are no established thresholds for construction; construction emissions are amortized over a 30-year period and added to the operational emissions (see Table 4).

**Table 1  
Construction Emissions  
“Criteria Pollutants”  
(Pounds Per Day)**

| Source/Phase       | ROG       | NO <sub>x</sub> | CO        | SO <sub>2</sub> | PM <sub>10</sub> | PM <sub>2.5</sub> |
|--------------------|-----------|-----------------|-----------|-----------------|------------------|-------------------|
| Daily Summer (Max) | 4.0       | 39.8            | 37.1      | 0.0             | 9.7              | 5.7               |
| Daily Winter (Max) | 30.7      | 39.8            | 36.7      | 0.0             | 9.7              | 5.7               |
| SCAQMD Threshold   | 75        | 100             | 550       | 150             | 150              | 55                |
| <b>Significant</b> | <b>No</b> | <b>No</b>       | <b>No</b> | <b>No</b>       | <b>No</b>        | <b>No</b>         |

Source: CalEEMod 2022 Construction: Max Criteria Emissions.

**Table 2  
Construction Emissions  
“Greenhouse Gas”  
(Metric Tons per Year)**

| Source/Phase                        | CO <sub>2</sub> | CH <sub>4</sub> | N <sub>2</sub> O | R   |
|-------------------------------------|-----------------|-----------------|------------------|-----|
| Average Daily (Max)                 | 1,368           | 0.0             | 0.0              | 0.2 |
| <b>Total (MTCO<sub>2</sub>e)</b>    | <b>1,368.2*</b> |                 |                  |     |
| Construction Amortized for 30-Years | 45.6            |                 |                  |     |

Source: CalEEMod 2022 Construction: Max GHG Emissions.

\*additive of CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O and R is CO<sub>2</sub>e (equivalent)

What is the threshold?

As shown in Table 1 and Table 2 construction emissions would not exceed SCAQMD thresholds. Therefore, impacts would be less than significant.

*Operational Emissions*

The emissions calculations for the operational use of 27 single-family residences were modeled using CalEEMod 2022 default values. The addition of one additional lot would result in an incremental increase of modeled emission output, not measurable to the tenth degree based on the emissions results provided below. CalEEMod defaults were used for trip generation. Operational emissions modeled results are shown in Tables 3 and 4.

**Table 3  
Operational Emissions Summary  
(Pounds per Day)**

| <b>Source</b>      | <b>ROG</b> | <b>NO<sub>x</sub></b> | <b>CO</b>  | <b>SO<sub>2</sub></b> | <b>PM<sub>10</sub></b> | <b>PM<sub>2.5</sub></b> |
|--------------------|------------|-----------------------|------------|-----------------------|------------------------|-------------------------|
| Mobile             | 1.2        | 1.1                   | 7.7        | 0.0                   | 0.6                    | 0.0                     |
| Area               | 8.0        | 9.1                   | 0.6        | 0.0                   | 0.0                    | 1.9                     |
| Energy             | 0.0        | 0.2                   | 0.1        | 0.0                   | 0.0                    | 0.0                     |
| <b>Totals</b>      | <b>9.2</b> | <b>10.4</b>           | <b>8.4</b> | <b>0.0</b>            | <b>0.6</b>             | <b>1.9</b>              |
| SCAQMD Threshold   | 55         | 55                    | 550        | 150                   | 150                    | 55                      |
| <b>Significant</b> | <b>No</b>  | <b>No</b>             | <b>No</b>  | <b>No</b>             | <b>No</b>              | <b>No</b>               |

Source: CalEEMod 2022

Emissions represent the daily maximum emissions.

**Table 4  
Operational Emissions  
“Greenhouse Gas”  
(MT/yr)**

| <b>Source/Phase</b>             | <b>CO<sub>2</sub></b> | <b>CH<sub>4</sub></b> | <b>N<sub>2</sub>O</b> | <b>R<sup>1</sup></b> |
|---------------------------------|-----------------------|-----------------------|-----------------------|----------------------|
| Mobile                          | 268                   | 0.0                   | 0.0                   | 0.5                  |
| Area                            | 8.8                   | 0.0                   | 0.0                   | 0.0                  |
| Energy                          | 90.8                  | 0.0                   | 0.0                   | 0.0                  |
| Water                           | 6.7                   | 0.0                   | 0.0                   | 0.0                  |
| Waste                           | 2.2                   | 0.2                   | 0.0                   | 0.0                  |
| Refrigeration                   | 0.0                   | 0.0                   | 0.0                   | 0.0                  |
| Construction Amortized 30 Years | 45.6                  |                       |                       |                      |
| Total (MTCO <sub>2</sub> e)     | <b>434.6</b>          |                       |                       |                      |
| SCAQMD Screening Threshold      | <b>3,000</b>          |                       |                       |                      |
| <b>Significant</b>              | <b>No</b>             |                       |                       |                      |

Source: CalEEMod 2022

Model results for operational emissions as shown in Table 3 and Table 4 do not exceed the SCAQMD operational thresholds and therefore would not result in a significant impact. No mitigation measures are required.

## **Biological Resources**

Prior to performing a field survey, existing documentation relevant to the Project site was reviewed by Eugene Jennings, Principal Biologist; his report dated September 2023 is included as Attachment B. The most recent records of the California Natural Diversity Database (CNDDDB) managed by California Department of Fish & Wildlife (CDFW 2023), the United States Fish & Wildlife Service (USFWS) Critical Habitat Mapper (USFWS 2023), and the California Native Plant Society's Electronic Inventory (CNPSEI) of Rare and Endangered Vascular Plants of California (CNPS 2023) were reviewed for the following maps containing and surrounding the Project site: *San Jacinto and Lakeview* U.S. Geological Survey's (USGS) 7.5-minute topographic maps. These databases contain records of reported occurrences of federal- or State-listed endangered or threatened species, California Species of Special Concern (SSC), or otherwise special status species or habitats that may occur within or in the immediate vicinity of the Project site. The site is not located within or adjacent to any USFWS-designated Critical Habitat.

The Regional Conservation Authority's website and databases were also searched. This includes the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) and any relevant protocol survey requirements. The database also includes a mapping program that contains site-specific information related to criteria cell location, special survey areas for plants and animals, and vegetation mapping.

Jennings biologist, Gene Jennings, conducted the general reconnaissance survey within the Project site to identify the potential for the occurrence of special status species, vegetation communities, or habitats that could support special status wildlife species. The survey was conducted on foot, throughout the Project site between 0800 and 0930 hours on March 12, 2023. No obvious signs of jurisdictional features and no State and/or federally listed threatened or endangered species or other sensitive species were observed on-site during surveys.

Portions of the Project site and the immediate surrounding area do provide suitable habitat for nesting birds. There are mature trees in the adjacent neighborhoods and the open spaces provide suitable habitat for other ground nesting species (i.e. killdeer (*Charadrius vociferus*)). As such the Proposed Project is subject to the federal and State nesting bird regulations. Therefore, if construction is to occur during the nesting period of February 1 through September 15 the City will require as a Condition of Approval that a qualified Avian Biologist conduct pre-construction Nesting Bird Surveys prior to Project-related disturbance to nestable vegetation.

MSHCP Consistency: The site is not mapped within a criteria cell or subunit. The Project is also consistent with the MSHCP policies found in Section 6 which include Riparian/Riverine Areas/Vernal Pools; Narrow Endemic Plant Species; Urban/Wildlands Interface; and Surveys for Special Status Species. The site is not located within an area mapped for Narrow Endemic, Special Status Species, Riparian/Riverine/Vernal Pools, and Urban/Wildlife Interface. The site is mapped within an area for Criteria Area Species Surveys for BUOW. Since there is some habitat within the Project site (refer to Attachment B) and adjacent area that is suitable for BUOW in general, the City will require a Pre-Construction Burrowing Owl Survey as a condition of approval in compliance with the MSHCP.

## **Historic, Cultural, and Paleontological Resources**

The San Jacinto 2040 General Plan Update Draft Environmental Impact Report<sup>5</sup> determined that a number of historic and cultural resources are found in San Jacinto, however, none of these are located near the project site which is surrounded by more recent residential development.

A project-specific paleontological research report was conducted by Brian F. Smith & Associates, Inc. (see Attachment C). BFSA found that research has confirmed the existence of the potentially fossiliferous Pleistocene alluvial deposits that underlie the Holocene deposits at the Project Site at an unknown depth. However, they conclude that based on the shallow grading depths planned for the project, Pleistocene-aged alluvial deposits are not anticipated to be encountered and, therefore, significant impacts to potential paleontological resources are not anticipated. Thus, paleontological monitoring is not recommended for the project. Should resources be discovered during site excavations, a paleontological monitoring program for the project may be required by the City.

Therefore, no significant impacts to Historic, Cultural, and Paleontological Resources would occur.

## **Vehicle Miles Traveled**

The amended CEQA Guidelines, specifically Section 15064.3, recommend the use of Vehicle Miles Travelled (VMT) as the primary metric for the evaluation of transportation impacts associated with land use and transportation projects. In general terms, VMT quantifies the amount and distance of automobile travel attributable to a project or region.

As documented in a Transportation Screening Assessment, dated March 21, 2023 (see Attachment D), the proposed residential project is forecast to generate approximately 255 daily weekday trips, including 19 trips during the AM peak hour and 25 trips during the PM peak hour. For informational purposes, trip generation for the existing church was also calculated based on trip generation rates from the ITE Trip Generation Manual for Land Use Code 560 (Church). As also shown the overall project site, inclusive of both the existing church and the proposed residential project, is forecast to generate a total of approximately 275 daily weekday trips, including 20 trips during the AM peak hour and 26 trips during the PM peak hour.

The VMT screening assessment was prepared in accordance with the City TIA Guidelines, which were developed based on guidance from the Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* (State of California, December 2018) [“OPR Technical Advisory”]. In accordance with the OPR Technical Advisory, certain types of projects generally reduce or have a negligible effect on VMT and may be presumed to result in a less than significant VMT impact without the need for more extensive analysis. The City TIA Guidelines establish the following three screening steps that may apply to effectively screen projects from project-level assessment.

- Transit Priority Area (TPA) Screening
- Low VMT Area Screening
- Project Type Screening

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<sup>5</sup> San Jacinto 2040 General Plan Update Draft EIR, July 2022

### TPA Screening

Projects located within a TPA, defined as a half-mile area around an existing major transit stop or an existing stop along a high-quality transit corridor, may be presumed to result in a less than significant VMT impact absent substantial evidence to the contrary. This presumption may not be appropriate if the project:

1. Has a Floor Area Ratio (FAR) of less than 0.75;
2. Includes 5% or more parking for use by residents, customers, or employees of the project than required by the City.
3. Is inconsistent with the applicable Sustainable Communities Strategy; or
4. Replaces affordable residential units with a smaller number of moderate or high-income residential units.

Based on review of existing transit services in the project vicinity, the project site is not located within a TPA; therefore, the project does not satisfy the TPA screening criteria.

### Low VMT Area Screening

Residential and office projects located within a low VMT generating area may be presumed to have a less than significant impact absent substantial evidence to the contrary. In addition, other employment-related and mixed-use land use projects may qualify for the use of screening if the project can reasonably be expected to generate VMT per resident, per worker, or per service population that is similar to the existing land uses in the low VMT area.

As prescribed in the City VMT Guidelines, the Western Riverside Council of Governments (WRCOG) VMT Tool was used to assess low VMT area screening for the project. The VMT Screening Tool was developed using the County's travel demand forecasting model (RIVCOM) to measure VMT performance for individual jurisdictions and for individual traffic analysis zones (TAZs). TAZs are geographic polygons similar to Census block groups used to represent areas of homogenous travel behavior. Total daily VMT per service population (population plus employment) was estimated for each TAZ. This presumption may not be appropriate if the project land uses would alter the existing built environment in such a way as to increase the rate or length of vehicle trips.

The proposed project is consistent with existing land uses in the project TAZ and there does not appear to be anything unique about the project that would otherwise be mis-represented utilizing the data from the WRCOG VMT Tool. Although the City TIA Guidelines define a significant impact to occur if a project exceeds the WRCOG subregional VMT per service population, the WRCOG VMT Tool does not provide a threshold option based on the WRCOG subregional average; therefore, the County baseline was selected for purposes of evaluating the low VMT area screening. Since the proposed use consists solely of residential use, the applicable service population is the residential population.

The project site is within TAZ 2177 which currently generates 12.3 VMT per resident, which is well below the County baseline of 18.1 VMT per resident. Therefore, the proposed project satisfies the City-established screening criteria for projects located in a low VMT area.

## Project Type Screening

The City TIA Guidelines establish that local serving retail projects less than 150,000 square feet may be presumed to have a less than significant impact absent substantial evidence to the contrary. Local serving retail generally improves the convenience of shopping close to home and has the effect of reducing vehicle travel.

- In addition to local serving retail, the City TIA Guidelines identify the following uses that can also be presumed to have a less than significant impact absent substantial evidence to the contrary as their uses are similarly local serving in nature or small enough to have a negligible impact on VMT: Local-serving K-12 schools
- Local parks
- Day care centers
- Local-serving gas stations
- Local-serving banks
- Local-serving hotels (e.g., non-destination hotels)
- Student housing projects
- Local serving community colleges that are consistent with the assumptions noted in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)
- Projects generating less than 500 daily vehicle trips. This generally corresponds to the following “typical” development potentials:
  - 53 single family housing units
  - 68 multifamily, condominiums, or townhouse housing units
  - 150,000 sq. ft. of local serving commercial
  - 100,000 sq. ft. of office
  - 100,000 sq. ft. of light industrial

The proposed project consists of 27 single-family housing units and is forecast to generate fewer than 500 daily trips. Therefore, the proposed project satisfies the City-established project type screening criteria.

There are currently no designated bicycle facilities on Kirby Street in the project vicinity; however, a Class 3 bike route is proposed on the City of San Jacinto Trails Master Plan north of Esplanade Avenue and a Class 4 bike lane on the City of Hemet General Plan south of Esplanade Avenue. There are no sidewalks currently provided on either side of the roadway. There are currently no designated bicycle facilities on Esplanade Avenue in the project vicinity; however, a Class I multi-use path is proposed on the City of San Jacinto Trails Master Plan. Sidewalks are provided along the roadway where the adjacent property is developed. The posted speed limit is 45 miles per hour west of Kirby Street and 40 miles per hour east of Kirby Street.

The Riverside Transit Agency provides bus service in the City of San Jacinto. The nearest bus stops are located 1.5 miles to the east for Route 44 and 1.3 miles to the south for Routes 74/79. These routes are outside the one-half mile walk shed that typically represents convenient access.

The proposed project satisfies the City-established criteria for low VMT area screening and project type screening; therefore, preparation of a traffic impact study that includes more extensive project-level VMT analysis is not warranted and the project may be presumed to result in a less than significant VMT impact.

### **Noise**

The Project Site is designated as Medium Density Residential under the General Plan and is zoned Residential, Medium Density (RM) under the City's General Plan and Development Code Update. The proposed project consists of 27 single-family housing units and is consistent with current City land use designation and zoning.

Construction of the proposed project would be conditioned to comply with the permitted construction hours specified in Chapter 8.40 of the San Jacinto Municipal Code. MC Section 8.40.090 Construction Activity Noise Regulations requires that construction of any building occur between the hours of 7:00 Am and 7:00 PM on weekdays and Saturdays, and between 9:00 AM and 6:00 PM on Sundays and holidays.

Operationally, the 27 single-family housing units are forecast to generate fewer than 500 daily trips. For the Vehicle Miles Traveled Screening, the proposed project satisfies the City-established project type screening criteria as well as the City-established screening criteria for projects located in a low VMT area. As the proposed project is consistent with the General Plan, it is not anticipated to generate traffic above what is designated in the General Plan and evaluated in the General Plan EIR.

Housing would be conditioned to be constructed to meet all City indoor acoustical standards. Standard construction practices provide a noise reduction of 10–15 dBA for building facades with open windows, and a noise reduction of approximately 25 dBA when windows are closed (Table 4). An exterior-to-interior noise reduction of 25 dBA can be obtained by requiring that building design include adequate ventilation systems, which would allow windows facing a noise source to remain closed, even during periods of excessively warm weather. Where greater noise reduction is required, acoustical treatment of the building facade may be necessary. Reducing relative window area is the most effective control technique, followed by providing acoustical glazing (e.g., thicker glass or increased air space between panes) within frames with low air infiltration rates, using fixed (i.e., non-movable) acoustical glazing, or eliminating windows. Noise transmitted through walls can be reduced by increasing wall mass (e.g., using stucco or brick in lieu of wood siding), or isolating wall members by using double or staggered stud walls, while noise transmitted through doorways can be lessened by reducing door area, using solid-core doors, or sealing door perimeters with suitable gaskets. Noise-reducing roof treatments include using plywood sheathing under roofing materials.<sup>6</sup>

### **Water Quality**

The 4.5-acre Project Site is surrounded by residential development to the north, south, and west, with commercial/residential development to the east. The area's storm drain system is managed by both the City and the Riverside County Flood Control and Water Conservation District (RCFCWCD). Page 5.8-5 of the General Plan FEIR states that the City shall ensure that all

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<sup>6</sup> General Plan EIR Appendix F – Noise Impact Study July 15, 2022, p. 13

components of the city's storm drain system potentially affected by existing and future projects conform to the most current RCFCWCD master drainage plans.

The City requires that Projects of one acre or more complete a Storm Water Pollution Prevention Plan (SWPPP). Construction activities covered under the State's General Construction permit include removal of vegetation, grading, excavating, or any other activities that causes the disturbance of one acre or more. The General Construction permit requires recipients to reduce or eliminate non-storm water discharges into stormwater systems, and to develop and implement a SWPPP. The purpose of the SWPPP is to: 1) identify pollutant sources that may affect the quality of discharges of stormwater associated with construction activities; and 2) identify, construct, and implement stormwater pollution control measures to reduce pollutants in stormwater discharges from the construction site during and after construction.

The National Pollutant Discharge Elimination System (NPDES) also requires a Water Quality Management Plan (WQMP). Mandatory compliance with the Proposed Project's WQMP as approved by the City of San Jacinto, in addition to compliance with NPDES Permit requirements, would ensure that all potential pollutants of concern are minimized or otherwise appropriately treated prior to being discharged from the Project Site. Therefore, implementation of the Proposed Project would not violate any water quality standards or waste discharge requirements. No significant adverse impacts are identified or anticipated, and no mitigation measures are required.