

**State Environmental Policy Act (SEPA)  
ENVIRONMENTAL CHECKLIST**

File No. \_\_\_\_\_

**PLEASE READ CAREFULLY BEFORE COMPLETING THE CHECKLIST!**

**Purpose of Checklist:**

The State Environmental Policy Act (SEPA) chapter 43.21C RCW, requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. An Environmental Impact Statement (EIS) must be prepared for all proposals with probable significant adverse impacts on the quality of the environment. The purpose of this checklist is to provide information to help you and the agency identify impacts from your proposal (and to reduce or avoid impacts from the proposal, if it can be done) and to help the agency decide whether an EIS is required.

**Instructions for Applicants:**

This environmental checklist asks you to describe some basic information about your proposal. Governmental agencies use this checklist to determine whether the environmental impacts of your proposal are significant, requiring preparation of an EIS. Answer the questions briefly, with the most precise information known, or give the best description you can.

You must answer each question accurately and carefully, to the best of your knowledge. In most cases, you should be able to answer the questions from your own observations or project plans without the need to hire experts. If you really do not know the answer, or if a question does not apply to your proposal, write "do not know" or "does not apply." Complete answers to the questions now may avoid unnecessary delays later.

Some questions ask about governmental regulations, such as zoning, shoreline, and landmark designations. Answer these questions if you can. If you have problems, the governmental agencies can assist you.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

**Use of checklist for nonproject proposals:**

Complete this checklist for nonproject proposals, even though questions may be answered "*does not apply.*"

IN ADDITION, complete the SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (Part D).

For nonproject actions, the references in the checklist to the words "project," "applicant," and "property or site" should be read as "proposal," "proposer," and "affected geographic area," respectively.

**A. BACKGROUND**

1. Name of proposed project: 2513 N Regal Apartments
2. Applicant: Whipple Consulting Engineers, Inc.
3. Address: 21 S Pines Road  
City/State/Zip: Spokane Valley, WA 99206 Phone: 509-893-2617  
Agent or Primary Contact: Ryan M. Andrade, P.E.  
Address: 21 S Pines Road  
City/State/Zip: Spokane Valley, WA 99206 Phone: 509-893-2617  
Location of Project: City of Spokane, Washington  
Address: 2513 N Regal Street  
Section: 09 Quarter: NE Township: 25 N Range: 43 E  
Tax Parcel Number(s): 35091.2707
4. Date checklist prepared: May 21, 2020
5. Agency requesting checklist: City of Spokane, WA
6. Proposed timing or schedule (including phasing, if applicable): Construction is scheduled to begin in the summer of 2020.
7. a. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain. None anticipated.  
  
b. Do you own or have options on land nearby or adjacent to this proposal? If yes, explain. No, none.
8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal. Geotechnical Report, Trip Generation Letter, Storm Drainage Report, as well as other information as required.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain. No, none.
10. List any government approvals or permits that will be needed for your proposal, if known. Permits expected to be necessary include SEPA, grading, building, access, ROW, and sign permits, as well as driveway and street obstruction permits.
11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. The project involves the development of a 1.85 acre +/- site at the northwest corner of Regal Street and Crescent Avenue. This project will be the development of a single-building 32-unit apartment complex with parking, fencing, landscaping, utilities, and open space. For 32 units, there will be approximately 45 new parking stalls. Site development will include clearing and grading the site for proper drainage; cuts and fills are expected. This is expected to be a net cut project. Net cut quantities are anticipated to be 1,000 to 2,000 cubic yards and total earth movement quantities are anticipated to be approximately 6,000 cubic yards.
12. Location of the proposal: Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit application related to this checklist. The project is located at the northwest corner of the intersection of Regal Street and Crescent Avenue; more specifically at 2513 N Regal Street. The parcel number is 35091.2707.
13. Does the proposed action lie within the Aquifer Sensitive Area (ASA)? The General Sewer Service Area? The Priority Sewer Service Area? The City of Spokane? (See: Spokane County's ASA Overlay Zone Atlas for boundaries.) The project does lie within the Aquifer Sensitive Area, general sewer service area, priority sewer service area, and the City of Spokane.

14. The following questions supplement Part A.

a. Critical Aquifer Recharge Area (CARA) / Aquifer Sensitive Area (ASA)

- (1) Describe any systems, other than those designed for the disposal of sanitary waste installed for the purpose of discharging fluids below the ground surface (includes systems such as those for the disposal of stormwater or drainage from floor drains). Describe the type of system, the amount of material to be disposed of through the system and the types of material likely to be disposed of (including materials which may enter the system inadvertently through spills or as a result of firefighting activities). The stormwater management system proposed for the site will include a bio-retention LID pond for treatment and City standard drywells that will allow treated surface water runoff to percolate below the ground surface. All stormwater systems will be provided per the Spokane Regional Stormwater Manual (SRSM).
- (2) Will any chemicals (especially organic solvents or petroleum fuels) be stored in aboveground or underground storage tanks? If so, what types and quantities of material will be stored? No.
- (3) What protective measures will be taken to insure that leaks or spills of any chemicals stored or used on site will not be allowed to percolate to groundwater. This includes measures to keep chemicals out of disposal systems. No commercial volumes of chemicals will be stored onsite. During construction refueling operations, the contractor will maintain strict spill and remediation protocols. After development, only household volumes of chemicals will be used and all spill cleaned up in keeping with the limited amount spilled; therefore, no protective measures are proposed.
- (4) Will any chemicals be stored, handled or used on the site in a location where a spill or leak will drain to surface or groundwater or to a stormwater disposal system discharging to surface or groundwater? No chemical will be stored by residents of future management that the stored volume could not be readily handled safely and efficiently with minimal spill impact on hard surfaces for easy cleanup.

b. Stormwater

(1) What are the depths on the site to groundwater and to bedrock (if known)? The depth to groundwater is estimated to be approximately 30 to 45 feet below the site based on nearby water well logs obtained from the WDOE. Depth to bedrock is unknown, given that it was not observed in the geotechnical report test pits.

(2) Will stormwater be discharged into the ground? If so, describe any potential impacts. Yes, treated stormwater will be discharged into the ground via drywells and bio-retention LID ponds; per the SRSM, no impacts beyond those noted in the SRSM are anticipated. The treatment pond is proposed for the south side of the site.

c. ENVIRONMENTAL ELEMENTS

1. Earth

a. General description of the site (check one):

Flat  Rolling  Hilly  Steep slopes  Mountainous

Other: The site is hilly with steep slopes ranging from 8 to 15%.

b. What is the steepest slope on the site (approximate percent slope)? See survey - varies 8 to 15% slopes.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils. General soil types are Urban Land - Opportunity disturbed complex. These soils are described as well drained, very gravelly ashy loam to extremely gravelly coarse sand.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe. None known.

- e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill: Site development will include clearing and grading the site for proper drainage; cuts and fills are expected. This is expected to be a net cut project. Net cut quantities are anticipated to be 1,000 to 2,000 cubic yards and total excavated quantities are anticipated to be approximately 6,000 cubic yards.
- f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe. Yes, Erosion could occur during construction from rain and/or winds.
- g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt, or buildings)? Approximately 62% of the site will be covered with buildings and/or asphalt or other paving.
- h. Proposed measures to reduce or control erosion or other impacts to the earth, if any: Proper erosion control methods during construction (i.e. silt fences, temporary swales, etc.); non-impervious surfaces will be re-vegetated, site watering, etc.

## 2. Air

- a. What type of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known. Dust and automobile emissions will increase during demolition and construction activities; automobile emissions will increase after the project is complete due to increased traffic to the site, however no general increase in emissions to the surrounding area is anticipated.
- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe. None known.

c. Proposed measures to reduce or control emissions or other impacts to air, if any: Dust control methods during demolition and construction (i.e. watering, street sweeping), and defined path of travel for construction equipment entering and exiting the site to keep streets as clean as practical. Upon completion of construction, areas will be re-vegetated in accordance with the City of Spokane landscaping development standards. Street sweeping as necessary or required.

### 3. Water

#### a. SURFACE WATER:

- (1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into. Yes, the Spokane River is approximately 350 feet to the south of this project.
- (2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans. Road paving for the southern half of Regal Street improvements will be within 200 feet of the Spokane River. See civil plans for more information.
- (3) Estimate the amount of fill and dredge material that would be placed in or removed from the surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material. Not applicable, no site or vicinity wetlands.
- (4) Will the proposal require surface water withdrawals or diversions? If yes, give general description, purpose, and approximate quantities if known. No.

- (5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan. A review of the pertinent FEMA maps indicates no flood plains on site.
- (6) Does the proposal involve any discharge of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge. No, a public sewer is available to the project site.

b. GROUNDWATER:

- (1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known. This project will not directly withdraw water; however, this project will connect to a public water system and be served under their current water right. No specific or identifiable increase or impact is anticipated by development of this project. Additionally, treated stormwater will be discharged via the constructed stormwater system.
- (2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve. No waste will be discharged, as public sewer connection is required.



c. WATER RUNOFF (INCLUDING STORMWATER):

- (1) Describe the source of runoff (including stormwater) and method of collection and disposal if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe. Stormwater runoff will be collected from surface parking area and building roofs and treated and directed to a bio-retention LID pond and drywell. Approximately 1,300 cf of runoff may be generated by this development for the 25-year storm.
- (2) Could waste materials enter ground or surface waters? If so, generally describe. No, while surface pollutants will migrate from pavement areas to the bio-retention LID pond, this water will be treated as required by the SRSM and maintained in the near surficial soils.
- (3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe. No.

d. PROPOSED MEASURES to reduce or control surface, ground, and runoff water, and drainage patten impacts, if any. Surface and roof water runoff will be directed to a bio-retention LID pond and drywell as required by the City and the SRSM.

**4. Plants**

a. Check the type of vegetation found on the site:

Deciduous tree:  alder  maple  aspen

Other: \_\_\_\_\_

Evergreen tree:  fir  cedar  pine

Other: \_\_\_\_\_

Shrubs  Grass  Pasture  Crop or grain

Orchards, vineyards or other permanent crops

Wet soil plants:  cattail  buttercup  bullrush  skunk cabbage

Other: \_\_\_\_\_

Water plants:  water lily  eelgrass  milfoil

Other: \_\_\_\_\_

Other types of vegetation: Weeds

b. What kind and amount of vegetation will be removed or altered? It should be assumed that as a highly graded site nearly all existing vegetation will be removed where necessary.

c. List threatened and endangered species known to be on or near the site. A review of available critical or endangered species, there are none present for this area.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any: Non-impervious areas of the site will be landscaped with a combination of trees, shrub, groundcover, and grass.

e. List all noxious weeds and invasive species known to be on or near the site. Various weeds are present throughout the site.

## 5. Animals

a. Check and List any birds and other animals which have been observed on or near the site or are known to be on or near the site:

Birds:  hawk  heron  eagle  songbirds

Other: Sparrows/other non-native species, Pacific fly-way, Red-tailed hawks, other birds of prey

Mammals:  deer  bear  elk  beaver

Other: \_\_\_\_\_

Fish:  bass  salmon  trout  herring  shellfish

Other: Not applicable. None observed.

Other (not listed in above categories): \_\_\_\_\_

b. List any threatened or endangered animal species known to be on or near the site. A review of available critical or endangered species, there are none present for this area.

c. Is the site part of a migration route? If so, explain. A review of the Spokane County Critical Area maps indicates no migration route present.

d. Proposed measures to preserve or enhance wildlife, if any: None.

- e. List any invasive animal species known to be on or near the site. None known.

## 6. Energy and natural resources

- a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc. The completed project will use electric for lighting and cooling; and may use natural gas for heating.
- b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe. No.
- c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any: Energy conservation measures are required by Code and NREC calculations, other than required measures, none.

## 7. Environmental health

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste that could occur as a result of this proposal? If so, describe. No environmental health hazards are anticipated; however, there may be a modest increased risk of structure fire due to new structures being constructed where none existed previously. However, the threat from wildlands fire will be reduced due to cleaning operations.

- (1) Describe any known or possible contamination at the site from present or past uses. None known.
- (2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity. None known.
- (3) Describe any toxic or hazardous chemicals/conditions that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project. None anticipated.
- (4) Describe special emergency services that might be required. No special services are anticipated to be required for this project, as level of service as noted in the City's Comp. Plan are assumed to be adequate.
- (5) Proposed measures to reduce or control environmental health hazards, if any: None proposed or required.

b. NOISE:

- (1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)? Traffic on Regal Street and Upriver Drive as a major arterial & train traffic from the railroad tracks located north of the project site.
- (2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site. Some short-term noise from construction activities; some long-term noise from increased traffic.
- (3) Proposed measure to reduce or control noise impacts, if any: As this is a multi-family residential project within an urbanized corridor, no measures are proposed other than those required by code.

c. **Land and shoreline use**

- a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe. The current site is undeveloped. Adjacent uses are single family residential, open space, etc.
- b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use? No, not to our knowledge.

- 1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how: No.
- c. Describe any structures on the site. There are no structures; however, a powerline and water & sewer lines are present on the property serving other properties.
- d. Will any structures be demolished? If so, which? No.
- e. What is the current zoning classification of the site? Residential Multi-Family (RMF)
- f. What is the current comprehensive plan designation of the site? Residential Multi-Family (RMF)
- g. If applicable, what is the current shoreline master program designation of the site? Not applicable.

- h. Has any part of the site been classified as a critical area by the city or the county? If so, specify. A review of available documentation does not show any critical areas onsite.
- i. Approximately how many people would reside or work in the completed project? Approximately 48 to 60 people would reside in this complex.
- j. Approximately how many people would the completed project displace? None.
- k. Proposed measures to avoid or reduce displacement impacts, if any: None.
- l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: Compatibility established via review of the City Zoning Code, as well as this SEPA and building permit process.
- m. Proposed measures to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance, if any: Compatibility established via review of the City Zoning Code, as well as this SEPA and building permit process.



**9. Housing**

- a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing. 32 middle income apartment units.
- b. Approximately how many units, if any, would be eliminated? Indicate whether high-, middle- or low-income housing. None.
- c. Proposed measures to reduce or control housing impacts, if any: None.

**10. Aesthetics**

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed? The tallest structure is expected to be no taller than allowed by Code; the building is anticipated to have 3-stories. The principal exterior material will be a combination of the following materials: steel, brick, mortar, aluminum, glass, cement board, etc.
- b. What views in the immediate vicinity would be altered or obstructed? None.
- c. Proposed measures to reduce or control aesthetic impacts, if any: None.

## 11. Light and Glare

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur?  
Light and glare will result from the project's exterior building lights, and headlights from on-site traffic although mitigated by landscaping and change in site topography.
- b. Could light or glare from the finished project be a safety hazard or interfere with views? No.
- c. What existing off-site sources of light or glare may affect your proposal? None known.
- d. Proposed measures to reduce or control light and glare impacts, if any: Project will use shielded/cut-off light fixtures to control glare with reduced lighting levels during after-hours operation.

## 12. Recreation

- a. What designated and informal recreational opportunities are in the immediate vicinity? Witter Aquatic Center, Mission Park, Chief Garry Park, Spokane Community College, Minnehaha Park, and Andrew Rypien Field.
- b. Would the proposed project displace any existing recreational uses? If so, describe. No.
- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any: None.

**13. Historic and cultural preservation**

- a. Are there any buildings, structures, or sites, located on or near the sited that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers located on or near the site? If so, specifically describe. A review of WISAARD reveals none.
- b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources. None known.
- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archaeology and historic preservation, archaeological surveys, historic maps, GIS data, etc. None.
- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required. None proposed.

#### 14. Transportation

- a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any. The project site is served by and accessed from Crescent Avenue & Regal Street.
- b. Is site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop. Yes, the #33 & #39 bus stops are approximately 0.6 miles to the southeast at the corner of Greene Street & Jackson Avenue.
- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate? The project will include 45 parking stalls; there are no existing stalls.
- d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private). The project will require access from both Crescent Avenue & Regal Street and will provide widening and road improvements as required. Both streets will be fully improved on the half that touches the frontage of the project property. The other half will be paved only with a 12-foot wide asphalt pavement section.
- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail or air transportation? If so, generally describe. No.

- f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and non-passenger vehicles). What data or transportation models were used to make these estimates? The project will produce 12 AM driveway trips and 14 PM driveway trips, and an ADT of 174 trips. See attached Trip Generation Letter.  
*(Note: to assist in review and if known, indicate vehicle trips during PM peak, AM Peak, and Weekday (24 hours).)*
- g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, general describe. No.
- h. Proposed measures to reduce or control transportation impacts, if any: Access locations and configuration in accordance with City Traffic Engineer recommendations and site plan.

#### **15. Public services**

- a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe. At this time and as an infill project, we do not believe that this project will negatively impact these services below an acceptable level nor beyond the services ability to self-regulate per the comprehensive plan.
- b. Proposed measures to reduce or control direct impacts on public services, if any: None.

**16. Utilities**

a. Check utilities currently available at the site:

electricity

natural gas

water

refuse service

telephone

sanitary sewer

septic system

Other: \_\_\_\_\_  
\_\_\_\_\_

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed: Domestic water, fire water, sanitary sewer, gas, telephone/communications, and electrical services will all be provided using existing nearby utility infrastructure onsite.

Water – City of Spokane

Sewer – City of Spokane

Telephone – Century Link

Cable/Phone – Comcast

Gas/Power – Avista

**C. SIGNATURE**

I, the undersigned, swear under penalty of perjury that the above responses are made truthfully and to the best of my knowledge. I also understand that, should there be any willful misrepresentation or willful lack of full disclosure on my part, the agency must withdraw any determination of Nonsignificance that it might issue in reliance upon this checklist.

Date: 5/26/2020 Signature: Ryan M Alch

**Please Print or Type:**

Proponent: Whipple Consulting Engineers Address: 21 S Pines Road  
PO RYAN ANDRADE  
Phone: 509-893-2617 Spokane Valley, WA 99206

Person completing form (if different from proponent): \_\_\_\_\_

Phone: \_\_\_\_\_ Address: \_\_\_\_\_

**FOR STAFF USE ONLY**

Staff member(s) reviewing checklist: \_\_\_\_\_

Based on this staff review of the environmental checklist and other pertinent information, the staff concludes that:

- A. there are no probable significant adverse impacts and recommends a Determination of Nonsignificance.
- B. probable significant adverse environmental impacts do exist for the current proposal and recommends a Mitigated Determination of Nonsignificance with conditions.
- C. there are probable significant adverse environmental impacts and recommends a Determination of Significance.