

3.6 Greenhouse Gas Emissions

This section provides an assessment of potential impacts related to greenhouse gas (GHG) emissions that could result from project implementation. Potential impacts addressed in this section are related to GHG emissions generated by construction and operation of the project and consistency with applicable GHG emissions plans, policies, or regulations. The analysis in this section is based on the Air Quality and Greenhouse Gas Emissions Technical Report (ESA 2017) that was prepared for the proposed project, which is included in Appendix B of this EIR. Refer to Appendix B for a detailed description of the methodology used for the GHG analysis.

3.6.1 Environmental Setting

Background on Greenhouse Gases and Climate Change

GHGs are those compounds in the Earth's atmosphere which play a critical role in determining temperature near the Earth's surface. Specifically, these gases allow high-frequency shortwave solar radiation to enter the Earth's atmosphere, but retain some of the low-frequency infrared energy that is radiated back from the Earth toward space, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect.

The major concern with GHGs is increasing GHG concentrations in the atmosphere and the correlation with global climate change. Increased concentrations of GHGs in the Earth's atmosphere, attributed by the Intergovernmental Panel on Climate Change (IPCC) to anthropogenic activities (IPCC 2014), have been linked to global climate change and subsequent conditions such as rising surface temperatures, melting icebergs and snowpack, rising sea levels, and the increased frequency and magnitude of severe weather conditions. Existing climate change models also show that climate warming portends a variety of impacts on agriculture, including loss of microclimates that support specific crops, increased pressure from invasive weeds and diseases, and loss of productivity due to changes in water reliability and availability. In addition, rising temperatures and shifts in microclimates associated with global climate change are expected to increase the frequency and intensity of wildfires. Although there is disagreement as to the rate of global climate change and the extent of the impacts attributable to human activities, most in the scientific community agree that there is a direct link between increased emissions of GHGs and long-term global temperature increases.

The GHGs regulated under state law are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs). Because different GHGs have different warming potential, and CO₂ is the most common reference GHG for climate change, GHG emissions are often quantified and reported as CO₂ equivalents (CO₂e).¹ Large emission sources are reported in million metric tons (MMT) of CO₂e.¹

Some of the potential effects of global warming specifically in California may include loss of snow pack, sea-level rise, more days of extreme heat per year, more days of high ozone (O₃)

¹ A metric ton is 1,000 kilograms; it is equal to approximately 1.1 U.S. tons and approximately 2,204.6 pounds.

levels due to increased temperatures, more drought years, and more forest fires (CARB 2009). Globally, climate change has the potential to impact numerous environmental resources through potential, though uncertain, impacts related to future air temperatures and precipitation patterns.

Greenhouse Gas Emission Sources

According to much of the scientific literature on this topic, emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the transportation, industrial/manufacturing, utility, residential, commercial, and agricultural sectors (CARB 2015). In California the transportation sector is the largest emitter of GHGs, followed by industrial processes (CARB 2015). Emissions of CO₂ are by-products of fossil fuel combustion. CH₄, a highly potent GHG, results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) and is largely associated with agricultural practices and landfills. N₂O is also largely attributable to agricultural practices and soil management.

3.6.2 Regulatory Framework

Federal

Clean Air Act

The federal Clean Air Act (CAA) does not specifically regulate GHG emissions; however, the U.S. Supreme Court has determined that GHGs are pollutants that can be regulated under the federal CAA. On December 7, 2009, the U.S. Environment Protection Agency (USEPA) Administrator signed two distinct findings regarding GHGs under Section 202(a) of the federal CAA. The USEPA adopted a Final Endangerment Finding for the six defined GHGs (CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆). The Endangerment Finding is required before USEPA can regulate GHG emissions under Section 202(a)(1) of the Clean Air Act consistent with the United States Supreme Court decision. The USEPA also adopted a Cause or Contribute Finding in which the USEPA Administrator found that GHG emissions from new motor vehicle and motor vehicle engines are contributing to air pollution, which is endangering public health and welfare. There are currently no federal regulations that set ambient air quality standards for GHGs. However, in August 2012, the USEPA adopted vehicle emissions standards for GHGs for model year 2017 through 2025 passenger cars and light-duty trucks. By 2025, vehicles are required to achieve 54.5 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and 163 grams of CO₂ emission per mile.

State

California Air Resources Board

The California Air Resources Board (CARB), a department of the California Environmental Protection Agency (Cal/EPA), oversees air quality planning and control throughout California by administering the state implementation plan (SIP). Its primary responsibility lies in ensuring implementation of the 1989 Amendments to the California Clean Air Act (CCAA), responding to the federal CAA requirements, and regulating emissions from motor vehicles sold in California. CARB also sets fuel specifications to further reduce vehicular emissions. There are currently no

state regulations in California that establish ambient air quality standards for GHGs. However, California has passed laws directing CARB to develop actions to reduce GHG emissions, and several state legislative actions related to climate change and GHG emissions have come into play in the past decade.

Executive Order S-03-05

In 2005, in recognition of California's vulnerability to the effects of climate change, then Governor Arnold A. Schwarzenegger established Executive Order S-3-05, which set forth a series of target dates by which statewide emissions of GHGs would be progressively reduced, as follows:

- By 2010, reduce GHG emissions to 2000 levels.
- By 2020, reduce GHG emissions to 1990 levels.
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

Executive Order S-1-07

Executive Order S-1-07, which was signed by Governor Schwarzenegger in 2007, proclaims that the transportation sector is the main source of GHG emissions in California. It establishes a goal to reduce the carbon intensity of transportation fuels sold in California by at least 10 percent by 2020. As a result of this order, CARB approved a proposed regulation to implement the low-carbon fuel standard on April 23, 2009, which will reduce GHG emissions from the transportation sector in California by about 16 MMT in 2020.

Executive Order B-30-15

California Governor Edmund G. Brown issued on April 29, 2015, through Executive Order B-30-15, the following GHG emission reduction target:

- By 2030, California shall reduce GHG emissions to 40 percent below 1990 levels.

California Global Warming Solutions Act

California Assembly Bill (AB) 32, codified under Health and Safety Code (HSC) Division 25.5 and referred to as the California Global Warming Solutions Act of 2006, requires CARB to establish a statewide GHG emissions cap for 2020 based on 1990 emission levels. AB 32 required CARB to adopt and enforce programs and regulations that identify and require selected sectors or categories of emitters of GHGs to report and verify their statewide GHG emissions. In December 2007, CARB adopted 427 MT CO_{2e} as the statewide GHG emissions limit equivalent to the statewide levels for 1990. In 2016, the California State Legislature adopted Senate Bill (SB) 32 and its companion bill AB 197, and both were signed by Governor Brown. SB 32 and AB 197 amends HSC Division 25.5 and establishes a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and includes provisions to ensure the benefits of state climate policies reach into disadvantaged communities.

Climate Change Scoping Plan

In December 2008, CARB approved the AB 32 Scoping Plan outlining the state's strategy to achieve the 2020 GHG emissions limit (CARB 2009b). This scoping plan, developed by CARB in coordination with the Climate Action Team, proposes a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce dependence on oil, diversify California's energy sources, save energy, create new jobs, and enhance public health. The first update to the AB 32 Scoping Plan was approved on May 22, 2014, by CARB. As part of the proposed update to the scoping plan, the emissions reductions required to meet the 2020 statewide GHG emissions limit were further adjusted. With the passage of SB 32, CARB is in the process of preparing the second update to the scoping plan to reflect the 2030 target established in Executive Order B-30-15 and SB 32.

Senate Bill 375

SB 375, which establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions, was adopted by the State on September 30, 2008. On September 23, 2010, CARB adopted the vehicular GHG emissions reduction targets that had been developed in consultation with the metropolitan planning organizations (MPOs). The targets require a 7 to 8 percent reduction by 2020 and between 13 to 16 percent reduction by 2035 for each MPO. The San Diego Association of Governments (SANDAG) 2050 Regional Transportation Plan (RTP) and its Sustainable Communities Strategy (SCS) reduction target for per capita vehicular emissions is 7 percent by 2020 and 13 percent by 2035 (SANDAG 2011).

Senate Bill 97

SB 97, enacted in August 2007, required the Office of Planning and Research (OPR) to develop guidelines for the mitigation of GHG emissions, or the effects related to releases of GHG emissions. On April 13, 2009, the OPR submitted proposed amendments to the Natural Resources Agency in accordance with SB 97 regarding analysis and mitigation of GHG emissions. As directed by SB 97, the Natural Resources Agency adopted amendments to the CEQA Guidelines for GHG emissions on December 30, 2009. On February 16, 2010, the Office of Administrative Law approved the amendments, and filed them with the Secretary of State for inclusion in the California Code of Regulations. The amendments became effective on March 18, 2010.

Title 24, Building Standards Code and California Green Building Standards Code

The California Energy Commission first adopted the Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the state. Although not originally intended to reduce GHG emissions, increased energy efficiency and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods.

Part 11 of the Title 24 Building Energy Efficiency Standards is referred to as the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to “improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices.” When the CALGreen Code went into effect in 2009, compliance through 2010 was voluntary. As of January 1, 2011, the CALGreen Code is mandatory for all new buildings constructed in the state. The CALGreen Code establishes mandatory measures for new residential and nonresidential buildings, which include energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. The CALGreen Code was most recently updated in 2016 to include new mandatory measures for residential as well as nonresidential uses; the new measures took effect on January 1, 2017.

Renewables Portfolio Standard

On April 12, 2011, Governor Jerry Brown signed SB X1-2 to increase California’s Renewables Portfolio Standard, which mandates that a set proportion of the state’s energy be generated using renewable sources (e.g., solar, wind, hydroelectric), to 33 percent by 2020. SB 350 (Chapter 547, Statutes of 2015) further increased the Renewables Portfolio Standard to 50 percent by 2030. The legislation also included interim targets of 40 percent by 2024 and 45 percent by 2027. SB 350 was signed into law on October 7, 2015.

Regional

Sustainable Communities Strategies

In October 2015, SANDAG adopted the 2015 SCS, which builds on the previous 2011 SCS and directs investments within existing urbanized areas to encourage growth within existing higher-density urban boundaries and discourages urban and suburban sprawl. Elements of the 2011 SCS that have been implemented include the completion of bicycle and pedestrian projects and the expansion of transit with new rapid bus service. The goals of the 2015 SCS include increasing the number of homes and jobs near transit, reducing transit travel time, and achieving economic benefits due to reduced congestion and the construction of transportation infrastructure, as well as reducing air pollutant emissions.

Local

Oceanside Climate Action Element

In October 2016, the City held two public workshops on the City’s General Plan Update, which includes development of a Climate Action Element (E-CAP). The purpose of the E-CAP planning effort is to identify how the City can do its part to achieve State GHG emission reduction goals, provide measures for the City to mitigate its GHG emissions impact, and establish a method to determine whether future actions, such as approval of development projects, are consistent with the GHG emission reduction goals. The E-CAP will establish goals, objectives, and policies that move the City toward a sustainable future (e.g. improved energy efficiency, expanded renewable energy use, reduced greenhouse gas emissions, and adaptation to the anticipated impacts of climate change). The final E-CAP is anticipated to be released in 2018.

City of Oceanside General Plan

The City of Oceanside's General Plan Circulation Element includes goals and policies to reduce GHG emissions within the city. The following goals and policies from Circulation Element are relevant to the proposed project:

Policy 2.5: The City will strive to incorporate complete streets throughout the Oceanside transportation network which are designed and constructed to serve all users of streets, roads and highways, regardless of their age or ability, or whether they are driving, walking, bicycling, or using transit.

Pedestrian Facilities

Goal 5: Support walking as a primary means of transportation that in turn supports transit and bike options. A positive walking environment is essential for supporting smart growth, mixed land uses, transit oriented development, traffic calming and reducing traffic congestion and greenhouse gas emissions.

Intelligent Transportation System Technologies

Objective ii: Improve air quality and reduce greenhouse gas emissions through traffic signal optimization and the use of advanced signal control technologies.

Transportation Demand Management

Policy 4.9: The City shall look for opportunities to incorporate TDM [transportation demand management] programs into their Energy Roadmap that contributes to state and regional goals for saving energy and reducing greenhouse gas emissions.

3.6.3 Impact Assessment

Thresholds of Significance

Based on Appendix G of the CEQA Guidelines, a project would have a significant effect on GHG emissions if it would:

1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.
2. Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

The increased concentration of GHGs in the atmosphere has been linked to global warming, which can lead to climate change. Construction and operation of the project would incrementally contribute to GHG emissions along with past, present, and future activities, and the CEQA Guidelines acknowledge this as a cumulative impact. Therefore, impacts of GHG emissions are analyzed here on a cumulative basis.

As stated in Appendix G of the CEQA Guidelines, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the above determinations. The SDAPCD does not have quantitative thresholds for determining significance of construction or operational impacts. However, the County of San Diego provides guidance and thresholds for air quality analysis in its County of San Diego 2015 GHG Guidance:

Recommended Approach to Addressing Climate Change in CEQA Documents (County of San Diego 2015). A screening threshold of 900 MT of CO₂e per year is being used by the County as a conservative criterion for determining the size of projects that would require further analysis and mitigation with regard to climate change. This screening threshold would achieve the state’s objective of capturing 90 percent of the GHG emissions from new development projects in the residential/commercial sectors. If a project were to exceed the 900 MT of CO₂e per year threshold, the project would have a cumulatively considerable impact.

Impact Analysis

Issue 1: Would the proposed project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Complete Streets Improvements

The Complete Streets improvements are expected to result in a change in GHG emissions only during construction. Construction-related GHG emissions for the Complete Streets improvements were estimated using the same assumptions as the air quality analysis, and accounts for the completion of 12 roundabouts and associated Complete Streets improvements. Total estimated construction-related GHG emissions are shown in **Table 3.6-1**.

As shown in Table 3.6-1, the total estimated GHG emissions during construction of the Complete Streets improvements would be approximately 1,858 MT of CO₂e, which would equate to approximately 62 MT of CO₂e per year after amortization over 30 years.

**TABLE 3.6-1
 ESTIMATED TOTAL CONSTRUCTION GHG EMISSIONS**

Emission Source	Estimated CO₂e Emissions
Total Construction Emissions (2017)	1,858 (MT)
Annual Construction (Amortized over 30 years)	62 (MT/yr)

CO₂e= carbon dioxide equivalent; MT =metric tons; MT/yr = metric tons per year.
 SOURCE: ESA CalEEMod Modeling, August 2016.

The operation of the Complete Streets improvements is not expected to result directly in changes in area/indirect sources of GHG emissions associated with electricity and natural gas consumption, water transport, and solid waste generation. According to the traffic impact analysis (TIA) prepared for the project (IBI 2017), the Complete Streets improvements are not expected to result in any net increases in vehicle trips when compared to existing baseline conditions. Therefore, operation of the Complete Streets improvements would result in no impacts. The combined construction and operational impacts from the Complete Streets improvements would be less than significant, as GHG emissions would not exceed the threshold.

Incentive District

Information regarding specific future redevelopment projects within the Incentive District would be needed in order to quantify the level of impact associated with construction activities. However, given the amount of potential development associated with implementation of the Incentive District, it is reasonable to assume that on a programmatic-level, some large-scale construction activities with specific construction schedules and scenarios (i.e., emissions per day) could exceed thresholds and result in a significant impact. Construction of the Incentive District would be dependent on the market needs, however based on the analysis described under Issue 2 above, the maximum emissions would be 1,738 MT CO₂e annually with an amortized rate of 58 MT CO₂e annually.

The operation of the potential future redevelopment within the Incentive District would result in a change in area and indirect sources of GHG emissions associated with electricity and natural gas consumption, water transport, and solid waste generation. In addition, development under the Incentive District would add vehicle trips to the future traffic volumes when compared to existing baseline traffic volumes (IBI 2017). The traffic analysis conducted for the project accounts for different land use conditions in the Future 2035 with Project scenario. This scenario accounts for the Complete Streets improvements and the development and/or redevelopment which may occur under the Incentive District.

Total Greenhouse Gas Emissions

Complete Streets Improvements

The estimated operational GHG emissions resulting from the Complete Streets improvements are shown in **Table 3.6-2**, and only the construction-related GHG emissions contribute to the overall GHG emissions (i.e., there would be no change in operational emissions). As shown in Table 3.6-2, the total net annual GHG emissions associated with the Complete Streets improvements would be approximately 62 MT of CO₂e per year (detailed calculations are included in Appendix B of this EIR), which would not exceed the County’s proposed screening level threshold of 900 MT of CO₂e per year. Therefore, the net increase in GHG emissions associated with the Complete Streets improvements would be less than significant.

**TABLE 3.6-2
 ESTIMATED CONSTRUCTION GHG EMISSIONS**

Emission Source	Estimated Emissions CO₂e (MT/yr)
Annual Construction (Amortized over 30 years)	62
<i>Total Annual GHG Emissions</i>	62
Screening Level Threshold	900
Significant Impact?	No

CO₂e= carbon dioxide equivalent; MT/yr = metric tons per year; %=percent.

SOURCE: ESA CalEEMod Modeling, August 2016.

Incentive District

Information regarding specific development projects within the Incentive District, such as trip generation, and energy usage, would be needed in order to quantify GHG emissions from construction and operational activities. Project development screening levels were evaluated to determine typical project types and sizes that would result in a net change in GHG emissions less than the threshold of significance. In general, individual residential and commercial projects that would be developed pursuant to adoption of the Incentive District that result in a net increase in development over existing project site conditions less than the following screening levels would likely not individually exceed the GHG screening threshold:

- Mid-rise residential up to a net increase of 66 dwelling units over existing site conditions
- Fast food restaurant with drive-through up to a net increase of 2,930 square feet over existing site conditions
- High-turnover sit-down restaurant up to a net increase of 8,080 square feet over existing site conditions
- Strip mall retail up to a net increase of 23,500 square feet over existing site conditions
- General office building up to a net increase of 50,000 square feet over existing site conditions

Example mixed-use project scenarios that would result in a net increase in development over existing project site conditions less than the following screening levels would likely not individually exceed the GHG screening threshold:

- Mixed-use consisting of the following uses:
 - Mid-rise residential up to a net increase of 25 dwelling units over existing site conditions
 - Fast food restaurant with drive-through up to a net increase of 1,400 square feet over existing site conditions
 - Strip mall retail up to a net increase of 3,350 square feet over existing site conditions
- Mixed-use consisting of the following uses:
 - Mid-rise residential up to a net increase of 30 dwelling units over existing site conditions
 - High-turnover sit-down restaurant up to a net increase of 2,800 square feet over existing site conditions
 - General office building up to a net increase of 10,000 square feet over existing site conditions

Individual projects that exceed the land use screening levels above, or an equivalent combination of the land use screening levels for a mixed-use development, could potentially exceed the GHG screening threshold. As discussed in Section 3.6.2, as of October 2016, the City is in the process of developing an E-CAP), the purpose of which is to identify how the City can do its part to achieve state GHG emission reduction goals, provide measures for the City to mitigate its GHG emissions impact, and establish a method to determine whether future actions, such as approval of

development projects, are consistent with the GHG emission reduction goals. The E-CAP is anticipated to be released in 2018. Therefore, project consistency with the E-CAP cannot be evaluated at this time. Nonetheless, it is expected that individual development projects within the Incentive District would undergo a consistency analysis with applicable measures in the E-CAP after its adoption through the public process, which could potentially streamline the determination of GHG impacts under CEQA.

As the California Air Pollution Control Officers Association (CAPCOA) notes, the question of potential impacts to climate change from increases in GHG emission is uniquely cumulative in nature (CAPCOA 2008). Emissions from the operation of development projects would arise largely from mobile sources and electricity production, and both are sources of emissions regulated at the state level with clear mandates and milestones to reduce the GHG intensity of vehicular fuels and supplied power. As discussed above, current and future Title 24 standards will result in highly efficient buildings, with relatively low GHG footprints. The Title 24 standards also require that new buildings be “solar ready” and provide appropriate equipment, wiring, and solar zone, which is a section of the roof designated and reserved for the future installation of a solar electric or solar thermal system.

However, given the amount of development that could occur with implementation of the Incentive District, it is reasonable to assume that in the aggregate, development projects could eventually result in a net increase in GHG emissions over current emission levels in excess of the County’s proposed screening level threshold which is 900 MT of CO₂e per year. Therefore, implementation of the Incentive District could result in significant GHG emissions, and mitigation is required. Compliance with current and future Title 24 standards and **MM Incentive District AIR-2** would result in development projects which are more energy efficient than current development, relying on a wide array of strategies such as, possibly, solar water heating and photovoltaic roofs, Energy Star appliances, etc., resulting a reduction in GHG emissions as compared to current practices. There are no additional feasible mitigation measures available. Thus, even with **MM Incentive District AIR-2**, the net increase in GHG emissions in the aggregate could exceed thresholds, and impacts are considered significant and unavoidable.

Mitigation Measures: Implementation of **MM Incentive District AIR-2**.

Significance Determination: Significant and unavoidable

Issue 2: Would the proposed project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

Of the recommended actions contained in CARB’s Scoping Plan Action T-3 (Regional Transportation-Related Greenhouse Gas Targets) would apply to the project. CARB Scoping Plan Action T-3 aims to reduce GHG reductions by increasing access to a variety of mobility options such as transit, biking, and walking.

The Complete Streets project would be designed to allow for continuous bicycle facilities and streetscape improvements, and therefore, is consistent with the recommended actions in the CARB's Scoping Plan. Therefore, the Complete Streets improvements portion of the project would be consistent with the Scoping Plan measures.

Similarly, the Incentive District would be designed to allow for continuous bicycle facilities and streetscape improvements, and therefore is consistent with this recommendation in the CARB Scoping Plan. The Incentive District's goal is to increase population density and revitalization of the community. This is consistent with regional plans to reduce transportation-related GHG emissions as part of the overall statewide strategy under AB 32. The project would be supportive of the goals and benefits of the SANDAG RTP/SCS, which seeks "to guide the San Diego region toward a more sustainable future by integrating land use, housing, and transportation planning to create communities that are more sustainable, walkable, transit-oriented, and compact" (SANDAG 2011). As discussed previously, the TIA for the project shows that daily per capita VMT under future year 2035 with project conditions would be reduced compared to the 2008 model base year and future no project conditions by approximately 3 percent and 11 percent, respectively (IBI 2017). The project would reduce per capita VMT by locating more people near residential and commercial land uses and services, which would allow residents to walk to both places of employment and play. Because both the Complete Streets and Incentive District would be generally consistent with the scoping plan measures and the SANDAG RTP/SCS, impacts would be less than significant.

As discussed previously, the City is in the process of developing an E-CAP with an anticipated release date in 2018. Therefore, project consistency with the E-CAP cannot be evaluated at this time. Nonetheless, it is expected that individual development projects within the Incentive District would undergo a consistency analysis with applicable measures in the E-CAP after its adoption through the public process, which could potentially streamline the determination of GHG impacts under CEQA and provide additional evidence supporting the project's consistency with applicable GHG reduction plans and policies.

Mitigation Measures: No mitigation measures are required.

Significance Determination: Less than significant