

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

File No. Z16-906PPLT

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: **Moran South Estates**
2. Applicant: **Diamond Rock Construction, Inc. c/o Dennis Crapo**
3. Address: **2602 N. Sullivan Rd**
City/State/Zip: **Spokane Valley, WA 99216** _____ Phone: **509-924-8964**
Agent or Primary Contact: **Whipple Consulting Engineers, Inc. c/o Todd R Whipple, PE**
Address: **2528 N. Sullivan Rd**
City/State/Zip: **Spokane Valley, WA 99216** _____ Phone: **509-893-2617**
Location of Project: **City of Spokane**
Address: **4510 S Freya St.**
Section: **03** _____ Quarter: **NW** _____ Township: **24** _____ Range: **43** _____
Tax Parcel Number(s) **34032.9111**
4. Date checklist prepared: **October, 2016**
5. Agency requesting checklist: **City of Spokane**
6. Proposed timing or schedule (including phasing, if applicable): **Construction to begin winter 2016/spring 2017 with completion of infrastructure summer of 2017. House construction will be market dependent.**
7. a. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain. **No.** _____
b. Do you own or have options on land nearby or adjacent to this proposal? If yes, explain. **No.** _____
8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal. **Geotechnical investigations.** _____
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. **None known.** _____
10. List any government approvals or permits that will be needed for your proposal, if known. **Preliminary Plat, Final Plat, SEPA, Building Permits, Water Plans, Sewer Plans, Storm Drain Plans, Street Plans, UIC registrations, Street Tree Plan.** _____

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. **Development of 3.85± acres into a 13 lot single family residential plat with a single street, water, sewer and storm drain facilities. Lot sizes are proposed in the 8,000-11,000 square foot range.**
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 4510 S Freya Street in the City of Spokane. The parcel number is 34032.9111. The project is located in the NW ¼ of Section 3, Township 24 N, Range 43 E, W.M.** _____
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.) **Project lies within the ASA in the City of Spokane. Project lies within the City of Spokane sewer service area.** _____
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). **This proposal is in the Moran Praiire Special Drainage District and will use stormwater disposal methods consistent with Spokane Regional Stormwater Manual (SRSM), which may include grassed percolation areas, evaporation ponds, drywells and gravel galleries depending upon soil types at the locations of the proposed facilities. Anticipated rate will be appropriate for the design option chosen. At this time the volume is unknown. Because the system will follow the SRSM there will be a**

dead storage component of 0.5' in each swale or pond area that should limit direct discharge of items used in the home as well as firefighting activities. _____

(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. **Applicable BMP's will be used during construction to contain any leaks or spills as they occur.** _____

(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.** _____

b. Stormwater

(1) What are the depths on the site to groundwater and to bedrock (if known)? **Not known.** _____

(2) Will stormwater be discharged into the ground? If so, describe any potential impacts. **Yes, storm water will be discharged into the ground. No potential impacts are anticipated at this time.**

B. ENVIRONMENTAL ELEMENTS

1. Earth

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

Flat Rolling Hilly Steep slopes Mountainous

Other: _____

b. What is the steepest slope on the site (approximate percent slope)? **Approximately 2.5%.** _____

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. **Based on NRCS soil survey, Urban land-Seaboldt, disturbed complex.** _____

- d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.
No. _____
- 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: **Grading proposed would be for the streets and building pads. The grading would involve removal of organics, preparation of street subgrade and preparation of building pads. This will occur over the entire site. Although quantities are unknown at this time, we would anticipate the movement of approximately 5000 cy.** _____
- f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe. **Some minor erosion from wind and rain may occur during construction, but would be mitigated through the use of appropriate BMPs. No erosion would be expected from the use of the site as surfaces will be stabilized by paving, concrete, buildings and landscaping.** _____
- g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt, or buildings)? **35%** _____
- h. Proposed measures to reduce or control erosion or other impacts to the earth, if any: **Erosion will be reduced and controlled through the use of appropriate BMPs during construction and the stabilization of disturbed soils by paving, concrete, buildings and landscaping following construction.** _____

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.
During construction some fugitive dust could be expected, although the intent of the permits would be to control this instance. Additionally, there will be exhaust fumes from construction equipment, etc. At the completion of construction air emissions may occur from home appliances such as dryers and gas furnaces, exhaust from yard maintenance equipment, home owner vehicles and personal entertainment activities such as barbecuing.
- 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: ***During construction the use of appropriate dust control measures such as watering and proper maintenance of construction equipment.*** _____

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. **No.** _____
- (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. **No.** _____
- (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. **None.** _____
- (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. **No.** _____
- (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.** _____

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. ***No groundwater will be withdrawn from this site. Stormwater will be discharged to the underlying soils and groundwater as allowed per Spokane Regional Stormwater Manual (SRSM).*** _____

(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. **None.** _____

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. **The source of runoff from this site after completion of the plat will be from the constructed elements of the plat including but not limited to homes, streets, sidewalks driveways, lawns, open spaces, etc. The intent is to convey stormwater to catchments or pond areas to treat and discharge the treated stormwater as required by the SRSM to the underlying soils, via swales, ponds, drywells, galleries, etc.** _____

(2) Could waste materials enter ground or surface waters? If so, generally describe. **No, runoff will be treated in the catchment areas before entering ground water.** _____

(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. **As noted previously, the project will be developed following the requirements for stormwater as outlined in the SRSM. Additional measures, if any, will be added if required during design and as approved by the City.** _____

4. Plants

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

Deciduous tree: alder maple aspen

Other: Ash, Oak _____

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: **Domestic landscaping consisting of junipers, lilac & iris** _____

b. What kind and amount of vegetation will be removed or altered? **All vegetation will be removed.** _____

c. List threatened and endangered species known to be on or near the site. **None known.** _____

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any: **Drainage areas will be vegetated per standards to provide treatment. Individual lots will be landscaped and the streets will have street trees planted.** _____

e. List all noxious weeds and invasive species known to be on or near the site. **Canadian Thistle, Dalmatian Toadflax, Hoary Alyssum, Spotted Knapweed.** _____

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: _____

Mammals: deer bear elk beaver

Other: _____

Fish: bass salmon trout herring shellfish

Other: _____

Other (*not* listed in above categories): _____

b. List any threatened or endangered animal species known to be on or near the site.

None known. _____

c. Is the site part of a migration route? If so, explain. **No.** _____

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.

Electricity and natural gas will be made available to each home site for heating, air conditioning and lighting of the houses. Additionally, solar, wind and other sources of power would be available if installed by residents. _____

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: **None at this time beyond those commonly found in "Energy Star" or equivalent appliances, building codes, etc.** _____

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.

(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 known.** _____

(4) Describe special emergency services that might be required. **None anticipated.** _____

(5) Proposed measures to reduce or control environmental health hazards, if any: **None.**

b. NOISE:

(1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)? **Traffic and occupant noise associated with residential areas.**

(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. **In the short term, noises from construction equipment for both land disturbing and building construction. Long term noise would be typical traffic and occupant noises associated with residential areas. Construction noise is anticipated to occur during daylight hours.** _____

(3) Proposed measure to reduce or control noise impacts, if any: **Construction restricted to hours allowed by City code.** _____

8. 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 site is currently used for a residence with numerous sheds, garages and other outbuildings. The property to the west is used for multi-family dwellings (apartments). The properties north and south are used for single family lots in the 1/5 to 1/4 acre range. The properties to the east are a single family residence and a couple of 5 acre lots, one of which has a dwelling unit and outbuildings. The proposal will not affect current land uses on nearby or adjacent properties.**_____
- 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.**_____
- 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. **1 house, garage and numerous outbuildings of various sizes.**_____
- d. Will any structures be demolished? If so, which? **All buildings located within the new parcel 34032.9111 will be demolished.** _____
- e. What is the current zoning classification of the site? **Residential Single Family (RSF)**_____
- f. What is the current comprehensive plan designation of the site? **Residential 4-10** _____
- g. If applicable, what is the current shoreline master program designation of the site? **N/A.** _____
- h. Has any part of the site been classified as a critical area by the city or the county? If so, specify. **No.**
- i. Approximately how many people would reside or work in the completed project? **35** _____

- 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: **The proposal is for single family lots within an area zoned for residential, single family and the proposed lot sizes are in the same size range as those adjacent to the site. The project will be developed in accordance with the applicable City codes and standards for residential development, streets and utilities.** _____
- m. Proposed measures to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance, if any: **None.** _____

9. Housing

- a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing. **Thirteen middle income units.** _____
- b. Approximately how many units, if any, would be eliminated? Indicate whether high-, middle- or low-income housing. **One middle income unit would be eliminated but thirteen units constructed for a net increase of twelve units.** _____
- c. Proposed measures to reduce or control housing impacts, if any: **The replacement of one unit with thirteen units.** _____

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? **Maximum height as allowed by code, 35 feet. Exteriors may be one of the following or a combination; wood, brick, aluminum, lap siding (wood/concrete/vinyl) with cultured or natural stone, windows, doors, asphalt shingles or metal roofing, those materials common to house construction within the Spokane region.** ___
- 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? **Street lights and residential outside lighting from dusk until dawn.** _____
- 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? **Exterior lights from the adjacent apartments.** _____
- d. Proposed measures to reduce or control light and glare impacts, if any: **None.** _____

12. Recreation

- a. What designated and informal recreational opportunities are in the immediate vicinity? **Ben Burr Park, the Southside Sports Complex and Ferris High School sports fields are less than a mile from the site.** _____
- 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 site 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. **None identified in WISAARD search.** _____
- 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 or expected as both parcels were developed and occupied as residential properties with numerous outbuildings and land disturbance.** _____
- 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. **A review of aerial photos and WISAARD** _____

- 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 **As with most projects, directions in the plans and/or specifications will notify the contractor to stop work and notify the City and owner if an artifact or some similar item has been located and that work must cease until a review and determination has been made.** _____

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 site fronts on Freya Street, a principal arterial running north-south which intersects with east-west collectors, 37th Ave to the north and Palouse Highway to the south.** _____
- 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 **The area is served by Spokane Transit Authority and Route 45 is approximately 0.5 miles to the south at Freya Street and 55th Avenue.**
- c. How many additional parking spaces would the completed project or non-project proposal have? **N/A** How many would the project or proposal eliminate? **None.** _____
- 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 proposal will require the construction of approximately 590 ft of local access street west from Freya Street terminating in a cul-de-sac.** _____
- 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? **This project is anticipated to generate 124 average daily trips. The project is anticipated to generate 10 AM peak hour trips and 13 PM peak hour trips. These rates were developed from the Institute of Transportation Engineers Trip Generation Handbook and the Trip Generation Manual, 9th Edition. The project is not anticipated to generate any truck traffic.** _____

(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: **The proposal is for this project to participate in the City's traffic impact fee program.** _____

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. **As this project builds out the City's comprehensive plan, the assumption is that the level of service for public services is scalable and, therefore, contemplated by service providers at the time of completing the comprehensive plan. As such, no increase in public service beyond that contemplated would be required.** _____
- 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:

The following utilities are known at this time to be service providers adjacent to or within the immediate area

- 1. Avista – Gas***
- 2. Avista – Electricity***
- 3. CenturyLink – Telephone***
- 4. Comcast / Other – Cable TV***
- 5. City of Spokane – Sewer***
- 6. City of Spokane – Water***

The general construction activities anticipated are the extension of the utilities from Freya Street into the site to serve each lot.

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: 10/27/16 Signature: 

Please Print or Type:

Proponent: Diamond Rock Construction Address: 2602 N Sullivan Rd

Phone: 509-924-8964 Spokane Valley, WA 99216

Person completing form (if different from proponent): Merk Krigbaum

Phone: 509-893-2617 Address: 2528 N Sullivan Rd
Spokane Valley, WA 99216

FOR STAFF USE ONLY

Staff member(s) reviewing checklist: DAVE COMPTON

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.