
III. PROJECT DESCRIPTION

A. OVERVIEW OF ENVIRONMENTAL SETTING

The following section provides an overview of the environmental setting for the Project site. Additional descriptions of the environmental setting are provided in Chapters IV.A through IV.E of this Draft EIR. Also provided in this section is a discussion of related Projects in the vicinity of the Project site which are used as the basis for the discussion of cumulative impacts in Section IV of the Draft EIR.

CEQA Guidelines Section 15125(a) states an EIR must include a description of the physical environmental conditions in the vicinity of the Project, as they exist at the time the Notice of Preparation (NOP) is published, or if no NOP is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting would normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. As described in greater detail in Section I (Introduction), the NOP was circulated on June 12, 2020.

Regional Setting

The City of Milpitas is located in the northeastern section of the Santa Clara Valley which falls in the South Bay Area, as well as within the Silicon Valley. The eastern portion of the City is comprised of a range of high foothills and mountains, which are a part of the Diablo Range. The City of Milpitas is seen divided into three sections by Interstates 680 and 880. Areas west of I-880 are largely industrial and commercial. Between I-880 and I-680, there is an industrial zone in the south, and residential neighborhoods in the north. Other residential neighborhoods and undeveloped mountains are to the east of I-680. The proposed Project site is located in the industrial zoned area in between I-880 and I-680.

General Plan and Zoning Designation

The Project site and surrounding uses are located within the City's Industrial Zone M2, under the General Plan land use designation of Manufacturing (MFG). The Project site is bounded by Milpitas Boulevard to the east, Gibraltar Drive on the south and west and the north by a multi-tenant office building. The Project does not require a change to land use or zoning designation, nor does it require a Conditional Use Permit. There is no height limit in the Milpitas Municipal Code for structures in any of the Industrial zones, but the Code requires that "any structure that exceeds three (3) stories or thirty-five (35) feet must make the following finding: That any such excess height will not be detrimental to the light, air or privacy of any other structure or use currently existing or anticipated."¹ The maximum floor area ratio for the M2 zone is .40.

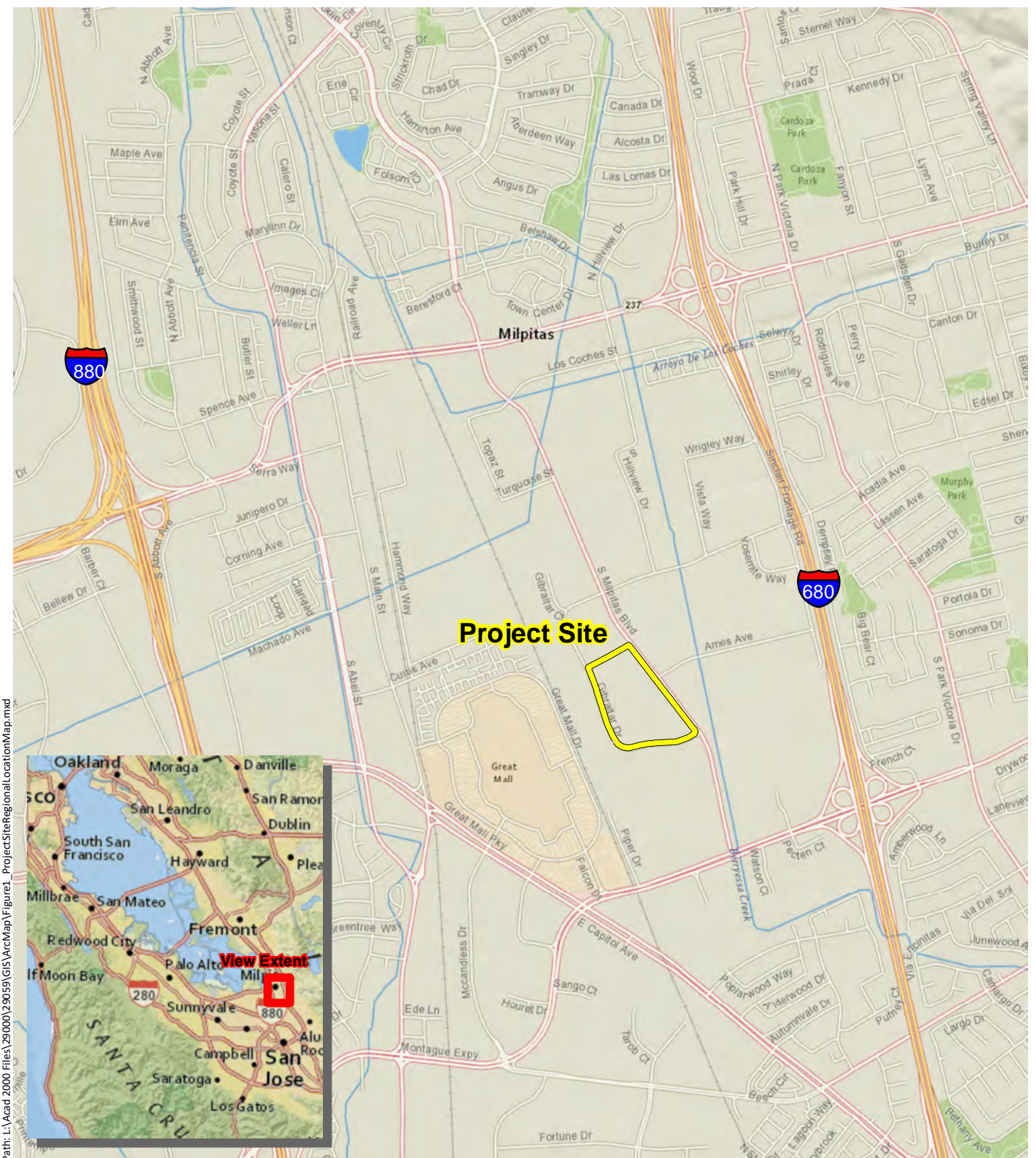
¹ Milpitas Municipal Code. Section 7 - Industrial Zones and Standards. Table XI-10-7.03-1. Accessed April 15, 2020. https://library.municode.com/ca/milpitas/codes/code_of_ordinances?nodeId=TITXIZOPLAN_CH10ZO_S7INZOST_XI-10.7.03INZOGEDEST

Project Site and Surrounding Land Uses

The 28.91-acre Project site is within the south-central portion of the City of Milpitas and is surrounded by light industrial and commercial uses. The Project site is bounded by South Milpitas Boulevard to the east, Gibraltar Drive to the south and west, and by a multi-tenant office building to the north (Figures III-1 and III-2). approximately ½ mile from Montague Expressway, 1 mile from Interstate 680, 2 miles from SR-237 and 2 miles from Interstate 880. Montague Expressway is an 8 lane Expressway running east-west to the south of the Project site. Interstate 680 is a 10-lane freeway running north-south to the east of the Project. Interstate 880 is an 8-lane freeway running north-south west of the Project site. SR-237/Calaveras Boulevard is an east/west arterial that links I-880 and I-680 and generally provides six travel lanes (four on the overcrossing over the Union Pacific Railroad tracks). Truck routes in the vicinity of the Project site include Gibraltar Drive, South Milpitas Boulevard, Yosemite Drive, Ames Avenue, Montague Expressway, and Calaveras Boulevard.

Bay Area Rapid Transit VTA constructed an extension of the Bay Area Rapid Transit (BART) system from Warm Springs (Fremont) to Berryessa (San Jose). The BART tracks are located approximately 2,500 feet southwest of the Project site, paralleling the east side of the Union Pacific Railroad Milpitas Yard. Also, Union Pacific Railroad operates several rail facilities in the Project vicinity.

The Project site is currently developed with a vacant, 397,009-square foot corporate campus including four office buildings and research/development facilities ranging from one to two stories in height with surface parking lots along the site periphery (Figure III-3) and has been vacant since 2015. The existing on-site floor to area ratio (FAR) is .31. The entire site is landscaped with a large number and variety of ornamental trees including valley oak, olive, paloverde, pittosporum, coast redwood, coast live oak, queen palm, spruce, crape myrtle, zelkova, strawberry tree, plum/cherry, yellow birch, Chinese pistache, London plane tree, sweetgum, Chinese fringe tree, and shamel ash. Existing views of the Project site are provided in Figures III-4 and III-5, and views of surrounding land uses are provided in Figures III-6 and III-7.



Sources: National Geographic, WRA | Prepared By: JSChuster, 4/1/2020

Figure III-1. Project Area Regional Location Map

1000 Gibraltar Drive
City of Milpitas, California

0 0.5 1 Miles





Sources: Esri World Imagery, WRA | Prepared By: JSChuster, 3/26/2020

Figure III-2. Aerial Photograph of Project Site

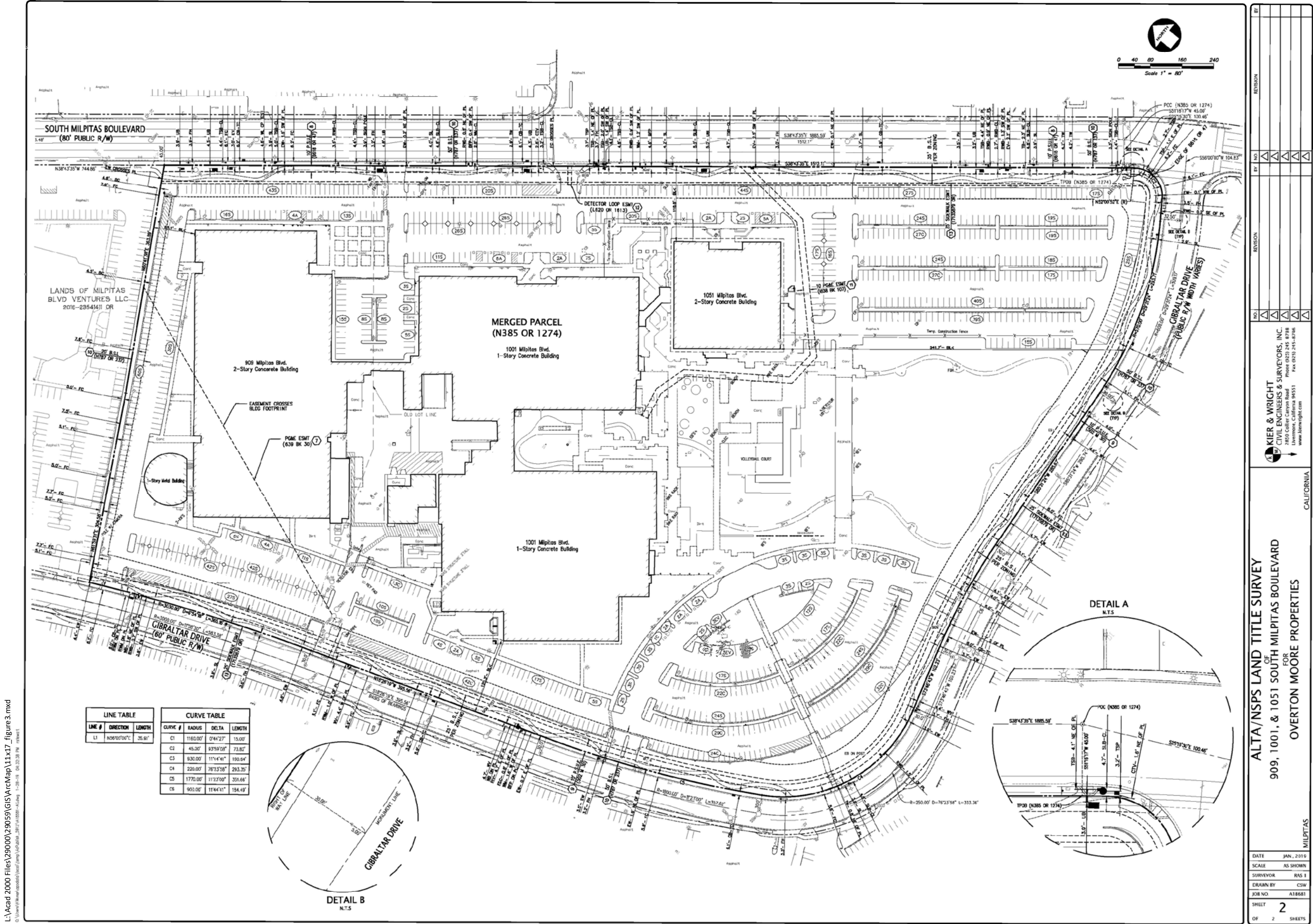
1000 Gibraltar Drive
City of Milpitas, California

0 250 500
Feet



Figure III-3.
ALTA/NSPS Land Title Survey

1000 Gibraltar Drive
City of Milpitas, California



Sources: DigitalGlobe 2016 Aerial, WRA | Prepared By: JSChuster, 4/17/2020



View of existing on-site structure and parking lot on the northern portion of the Project site.



Southern view of existing on-site building and parking lot on the northwestern portion of the Project site.



View looking down the western portion of the Project site at Gibraltar Drive with on-site trees.



View of existing on-site building and parking lot on the western portion of the Project site.



View of existing parking lot to the south on the eastern portion of the Project site.



View of existing building on the eastern portion of the Project site.



View of existing building on the northeastern portion of the Project site.



View of existing building and parking lot to the north on the eastern portion of the Project site.



View of existing off-site office building to the west of the project site.



View of existing off-site industrial building to the east of the project site



View of existing off-site industrial building to the east of the project site.



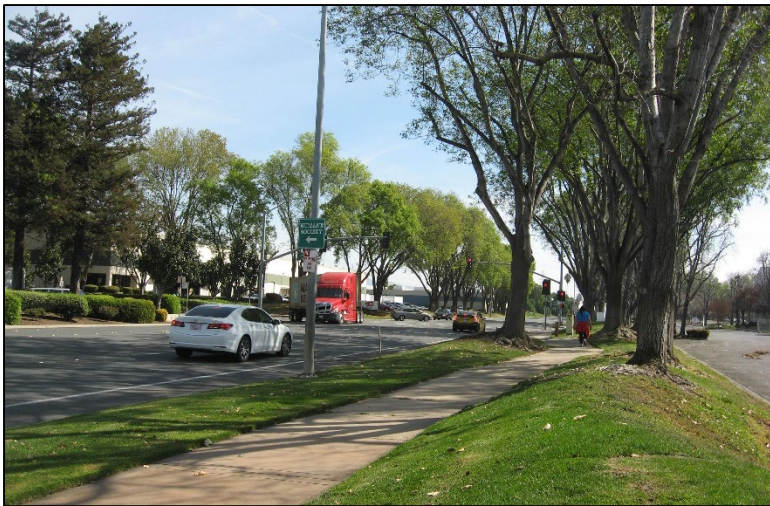
View of the off-site project area which supports a variety of commercial businesses and light industrial uses, separated by wide streets, landscaping, and parking lots.



Off-site view of an industrial complex northeast of the project site.



Off-site view of a street with the project site in the background.



Off-site view of a street running adjacent to the project area.



The project area supports a variety of commercial businesses and light industrial uses, separated by wide streets, landscaping, and parking lots.

B. RELATED PROJECTS

Sections 15126 and 15130 of the State CEQA Guidelines provide that EIRs consider the significant environmental effects of a proposed Project as well as “cumulative impacts.” Cumulative impacts refer to two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts (CEQA Guidelines Section 15355). Cumulative impacts may be analyzed by considering a list of past, present, and probable future projects producing related or cumulative impacts [CEQA Guidelines Section 15130(b)(1)(A)].

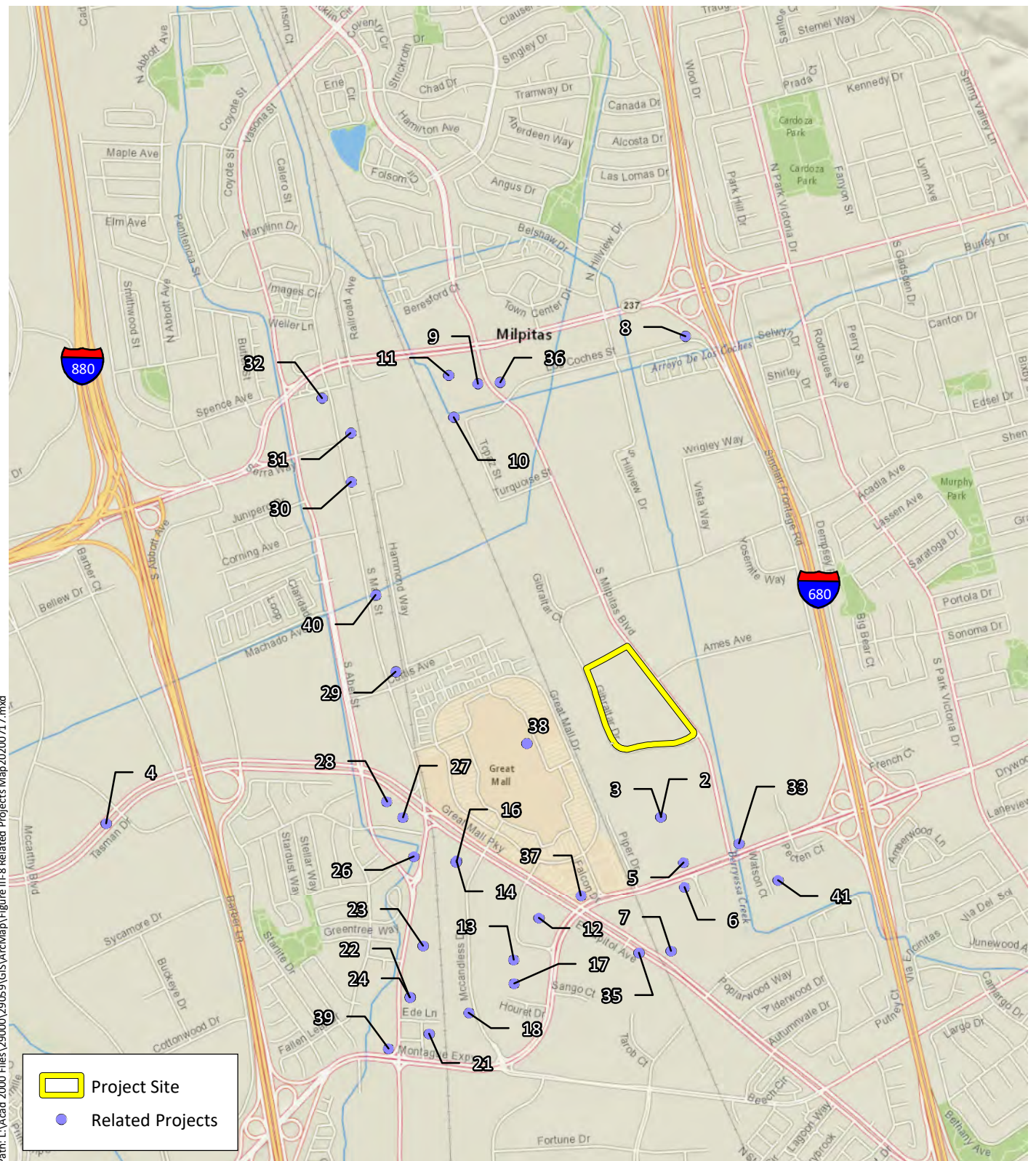
Table III-1 lists the related (or cumulative) projects identified for the proposed Project. These related projects consist of all approved, proposed, or projects currently under construction located in the City of Milpitas. The list includes projects of various land uses, including (but not limited to) single-family residential, multi-family residential, commercial, and retail. Figure III-8 (Related Projects Map) illustrates the location of each related project. For an analysis of the cumulative impacts associated with these related projects and the proposed Project, the reader is referred to the cumulative impact discussions under each individual impact category in Chapter IV of this Draft EIR.

**Table III-1
Related Projects**

| Related Project Number | Name and Location | Land Use | Unit/ Lot Size | Status |
|---|--|---------------------------|--|------------------------|
| Residential Development, Mixed Use | | | | |
| 1 | Montague Village Montague Expressway (APN 86-32-037- -040) | Multi-Family Residential | 545 Units 654,000 sf | Completed and Occupied |
| 2 | Piper & KB Townhomes (Montague Village) Piper Drive | Townhomes | 210 Units 254,937 sf; 2,937 Non-Residential sf | Completed and Occupied |
| 3 | Piper & KB Townhomes Piper Drive | Townhomes | 98 Units 117,600 sf | Under Construction |
| 4 | Milpitas Station (also known as Metro Villas Towns and Flats) Lot 1- Villas at Metro Lot 2- Towns at Metro Lot 3- Rows at Metro Lot 4- Flats at Metro | Multi-Family Residential | 303 Units 363,600 sf | Under Construction |
| 5 | The Edge Montague Expressway | Multi-Family Residential | 381 Units | Completed and Occupied |
| 6 | Lantana Montague Expressway (APN 092-08-077) | Multi-Family Residential | 216 Units 264,830 sf; 5,630 Non-Residential sf | Under Construction |
| 7 | The Crossings at Montague 755 East Capitol | Multi-Family Residential | 468 Units | Completed and Occupied |
| 8 | Robson Homes 905 and 980 Los Coches Street | Single-Family Residential | 83 Units; 3 stories | Completed and Occupied |
| 9 | PRYNT 75 South Milpitas Boulevard | Multi-Family | 26 Units | Under |

| Related Project Number | Name and Location | Land Use | Unit/ Lot Size | Status |
|------------------------|---|--------------------------|---|--------------------------|
| | | Residential | 31,200 sf | Construction |
| 10 | Cobblestone 345 Los Coches Street | Multi-Family Residential | 32 Units 38,400 sf | Completed and Occupied |
| 11 | Orchid 31 South Milpitas Boulevard | Townhomes | 80 Units | Completed and Occupied |
| 12 | Summerhill 1500-1646 Centre Pointe (APN 086-33-102) | Multi-Family Residential | 694 Units 869,300 sf; 36,500 Non-Residential sf | Completed and Occupied |
| 13 | Centre Pointe B & C 249 Wild Rose Way | Residential | 241 Units 289,200 sf | Under Construction |
| 14 | District - Lot 3A (Also known as the Fields) 1315 McCandless Drive | Multi-Family Residential | 423 Units 574,021 sf; 66,421 Non-Residential sf | Planning Permit Approved |
| 15 | The Avenue (District 2) | Multi-Family Residential | 200 Units 240,000 sf | Completed and Occupied |
| 16 | District - Lot 1 (also known as The Fields) 1355 McCandless Drive | Multi-Family Residential | 372 Units 500,262 sf; 53,861 Non-Residential sf | Completed and Occupied |
| 17 | Houret 1717 Hazelnut Lane | Residential | 114 Units 136,800 sf | Under Construction |
| 18 | Harmony 1765 McCandless Drive | Townhomes | 276 Units | Completed and Occupied |
| 19 | District - Lot 2 (also known as the Ava) | Multi-Family Residential | 208 Units 257,400 sf; 7,800 Non-Residential sf | Under Construction |
| 20 | Adimar Place 91 Montague Expressway (APN 086-34-023) | Multi-Family Residential | 72 Units 86,400 sf | Building Permit Filed |
| 21 | Paragon Condominium | Multi-Family Residential | NA | Completed and Occupied |
| 22 | Aspen Family Apartments 60 Mihalakis Street | Multi-Family Residential | NA | Completed and Occupied |
| 23 | Senior Lifestyles 1504 South Main Street | Multi-Family Residential | 199 Units 238,800 sf | Under Construction |
| 24 | The Mill 60 Mihalakis Drive (APN 086-23-011/015) | Multi-Family Residential | 220 Units 264,475 sf; 475 Non-Residential sf | Building Permit Filed |
| 25 | Zhang Condos (APN 086-23-006) | Multi-Family Residential | 18 Units 21,600 sf | Planning Permit Approved |
| 26 | Ilara Apartments 1201 South Main Street (APN 086-16-100) | Multi-Family Residential | 204 Units | Completed and Occupied |
| 27 | Centria East | Multi-Family Residential | NA | Completed and Occupied |
| 28 | Apex Apartments (Centria West) 1102 South Able Street | Multi-Family Residential | NA | Completed and Occupied |

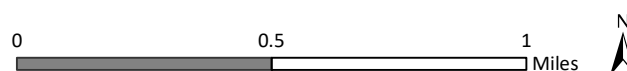
| Related Project Number | Name and Location | Land Use | Unit/ Lot Size | Status |
|---|---|--------------------------|---|--------------------------|
| 29 | Main Street Townhomes 808 South Main Street (APN 086-25-021) | Multi-Family Residential | 27 Units 34,187 sf; 1,787 Retail sf | Under Construction |
| 30 | Castle Companies Private Development 260 South Main Street | Multi-Family Residential | 25 Units 32,000 sf; 2000 Retail sf | Under Construction |
| 31 | Ilara Apartments 134 South Main Street (APN 086-16-100) | Multi-Family Residential | 69 Units 95,243 sf; 12,443 Non-Residential sf | Completed and Occupied |
| 32 | Charlene Lai Private Development 27 South Main Street | Multi-Family Residential | 10 Units 12,000 sf; 75 Office sf | Planning Permit Filed |
| Commercial, Mixed Use, and Miscellaneous Development | | | | |
| 33 | Brangagh Self Storage 985 Montague Expressway (APN 086-32-020) | Warehouse | 171,924 sf | Completed and Occupied |
| 34 | McCandless Elementary School | School | NA | Completed and Occupied |
| 35 | BART 1755 South Milpitas Blvd | Public Transportation | NA | Completed and Occupied |
| 36 | Cultural Center for Teco-Milpitas 100 South Milpitas Boulevard | Cultural Center | 30,784 sf | Completed and Occupied |
| 37 | Stratford School 341 Great Mall Parkway | School | 55,000 sf | Completed and Occupied |
| 38 | Legoland Discovery Center Great Mall Drive | Private Development | 32,000 sf | Under Construction |
| 39 | Rotten Robbie – New Gas Station 1787 S Main Street | Commercial | 3,200 sf | Building Permit Filed |
| 40 | Car Wash 554 South Main Street (APN 086-25-012) | Commercial | NA | Planning Permit Filed |
| 41 | Public Storage 1600 Watson Ct (APN 092-08-093,42) | Warehouse | 456,335 sf | Planning Permit Approved |
| <i>sf = square feet</i> <i>NA = not available</i> <i>Source: City of Milpitas, July 2020.</i> | | | | |



Sources: National Geographic, WRA | Prepared By: njander, 7/20/2020

Figure III-8: Related Projects Map

1000 Gibraltar Drive
City of Milpitas, California



C. PROJECT CHARACTERISTICS

Implementation of the proposed Project involves the demolition of all existing on-site buildings representing 397,009 square feet, parking lots, and associated improvements (Figure III-9). The proposed Project consists of a new 491,040-square foot tilt-up concrete creative industrial building with two supporting offices at the northwest and southeast corners and surface parking on all sides of the building and a proposed FAR of .38. (Figure III-10). Approximately 486,130 square feet of warehouse and 4,910 square feet of office space is proposed. The proposed building has been designed to accommodate up to two separate tenants with proposed uses including Advanced Manufacturing, E-Commerce, Light Assembly, Warehouse/Distribution, and possibly other uses permitted within the City's Industrial (M-2) zone. Flexibility has become a key issue as companies transform their business operations and technology pushes change at an ever-increasing pace. The proposed creative industrial building provides large unobstructed spaces that accommodate many types of activities and that support changing operations in a changing business landscape. The Project applicant is Overton Moore Properties. Its office is located at 19700 South Vermont Avenue, Suite #101 in Torrance, California. The Project site owner is Westport Capital Partners, 2121 Rosecrans Avenue, Suite 4325, El Segundo, California.

Proposed Project Design

The forward-looking configuration of the proposed creative industrial building includes two-story lanterns of glass that accentuate the office corners of the facility creating solid and void in the massing of the 42-foot tall facilities. Clearstories of glazing are proposed high on the concrete tilt up panels between the transparent corners providing natural light deep into the building footprint. Concrete panel elements are proposed to be used as accents and multi-colored paint compositions to break down the scale of the concrete tilt up walls. Each office area would also have an operable garage door that would open to a private patio. At 36 feet clear, the tall envelope of the building has been designed to accommodate a wide range of users that require efficient facilities. Proposed exterior elevations are illustrated in Figures III-11 and III-12. Visual renderings (see Figures III-13, III-14, III-15 and III-16) intend to depict the proposed Project and its expected appearance within the visual setting.

Open Space and Landscaping

The Tree Survey (Appendix B) found 183 protected trees within the Project site. Of these protected trees, approximately 88 would be removed by the proposed Project. The Project would comply with the City's Tree Ordinance, including the replacement of protected trees. Deep setbacks with landscaping along South Milpitas Boulevard and Gibraltar Drive are proposed to provide a consistent visual identity for the Project. The enhanced landscaping combines existing trees with new trees and would have varied tree species and shrubs with plant species that are consistent with the surrounding area and meet drought tolerant requirements. Green screens would also be providing living visible barriers that would

adequately screen views into the truck courts from South Milpitas Boulevard and Gibraltar Drive.

Lighting

The proposed Project is required to comply with the City's requirements for outdoor lighting. The Project's lighting plan would include night lighting for parking areas, walkways, and driveways. Outdoor lights would cast downward and would be shrouded to prevent glare. The Project site lighting would be designed to comply with Leadership in Energy and Environmental Design (LEED) light pollution reduction requirements.

Access, Circulation, and Parking

The circulation for the proposed Project has been designed to ensure the safe and efficient movement of cars and trucks throughout the Project site. Five driveways ranging in widths of 30 to 50 feet would be provided along South Milpitas Boulevard and Gibraltar Drive. Parking is proposed to be located in surface parking lots that would surround or be adjacent the proposed creative industrial building. Based upon a total of 491,040 square feet of creative industrial floor area, 338 parking spaces are required, whereas the proposed Project includes 346 parking spaces, thus exceeding the City's parking requirements. The proposed creative industrial building is proposed to be parked at two parking stalls per 1,000 square feet with the elimination of some dock doors, allowing for more job intensive operations on-site. The truck dock yards are proposed to be wider than typical at 125 feet, allowing for interior maneuverability within the truck courts. Provided will be 101 trailer parking stalls within the truck courts. Level 2 EV Charging stations will be installed at a count of 4% of the total parking spaces (approximately 14). Additionally, 25% of the truck dock doors will be provided as Level 2 EV Capable for future EV truck charging.

Grading and Drainage

Approximately 100,800 cubic yards of soil would be moved around the site, and grading of the site would be balanced. No export or import of soil is anticipated which will reduce truck trips during this phase of the proposed Project. There will be no pile driving.

The proposed Project includes the construction of low impact development (LID) stormwater management systems, including proposed bio-retention treatment areas (Figure III-9), which would allow stormwater runoff from the Project site to infiltrate the ground surface resulting in a net reduction of runoff from the site). Under existing conditions, stormwater runoff from impervious areas of the Project site is captured in storm drain systems with no opportunity to infiltrate the ground surface. The proposed Project's stormwater quality control plan is provided in Figure III-17.

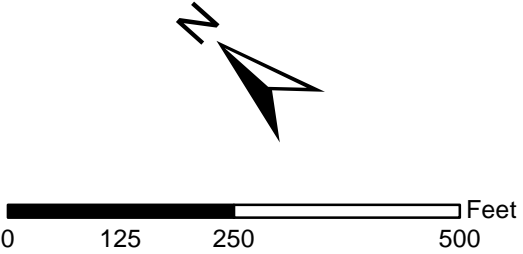
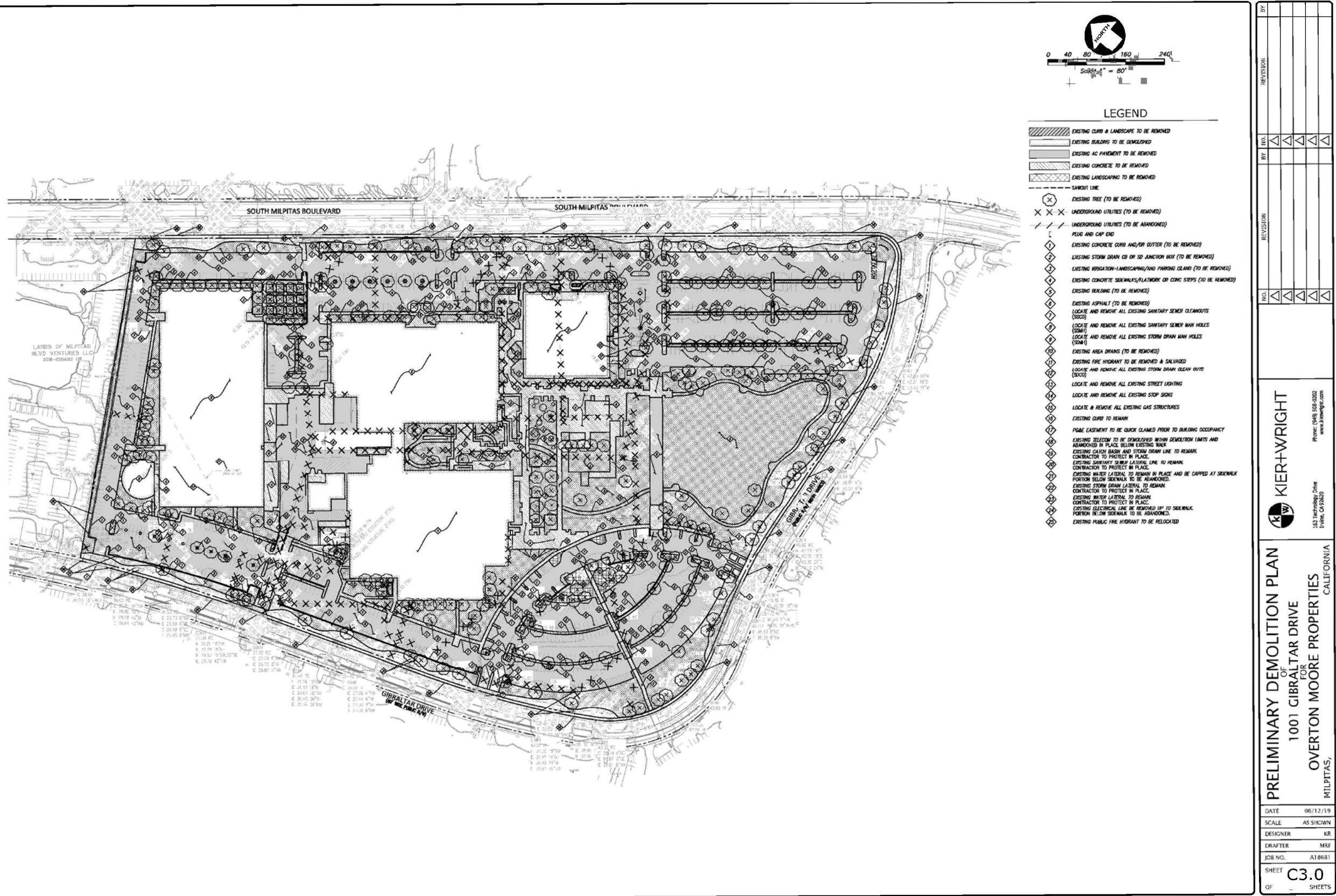
Demolition and Construction

The proposed Project would result in the demolition of the existing buildings and all surface pavements on the site. The demolition and construction phases of the proposed Project are

anticipated to take approximately 13 to 15 months. A preliminary demolition plan is included in Figure III-9. All demolished building components will be separated and recycled on site as fill (concrete, asphalt paving and trees as mulch in landscape areas and bioswales) or to offsite recycling facilities (steel, aluminum, copper, glass). Construction will be to CalGreen Tier I or Tier II standards including all Title 24 requirements. The Project is anticipated to be completed and occupied by early 2022.

Figure III-9.
Preliminary Demolition Plan

1000 Gibraltar Drive
City of Milpitas, California



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Sources: DigitalGlobe 2016 Aerial, WRA | Prepared By: JSChuster, 4/17/2020

Figure III-10.
Site Plan

1000 Gibraltar Drive
City of Milpitas, California

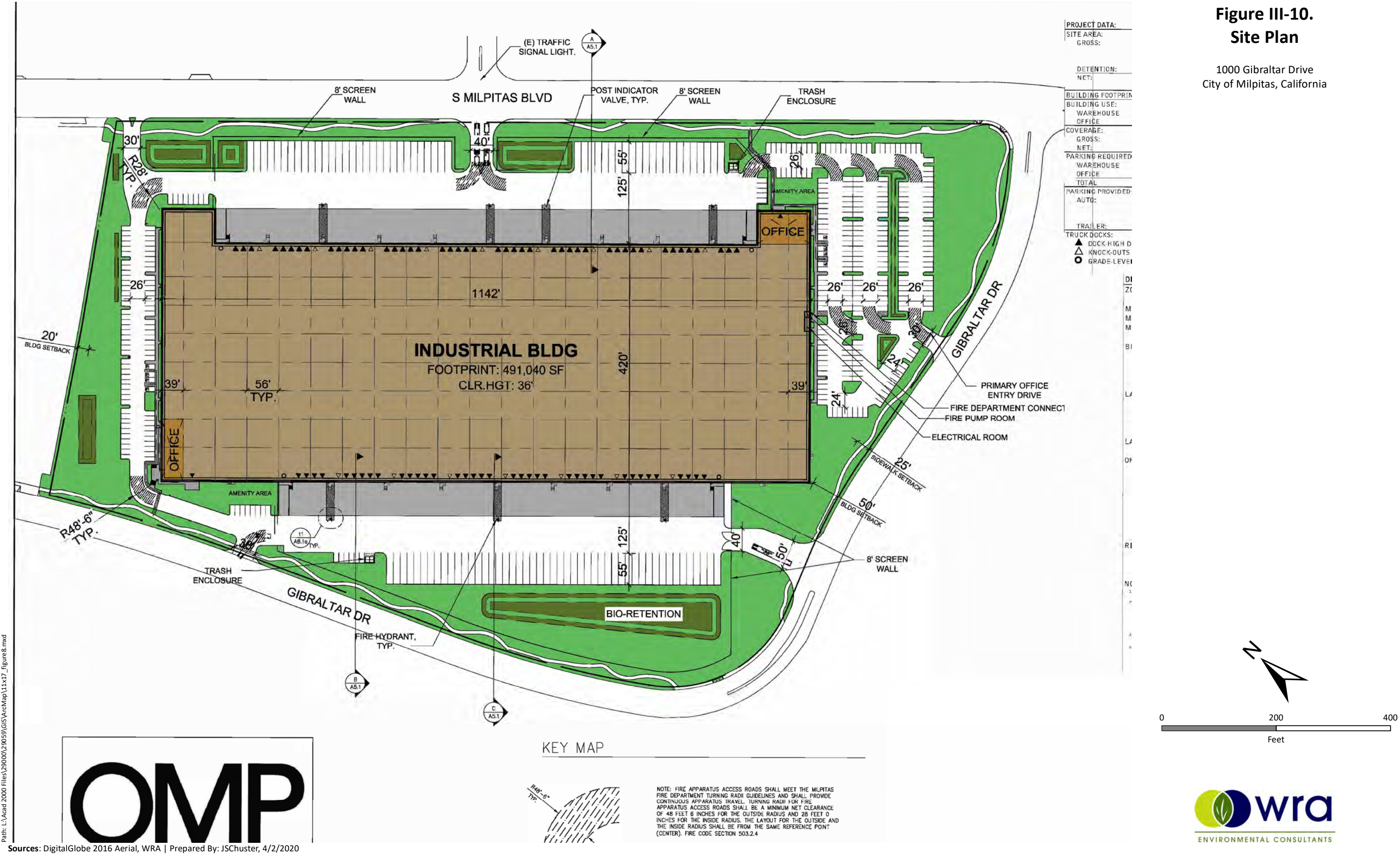
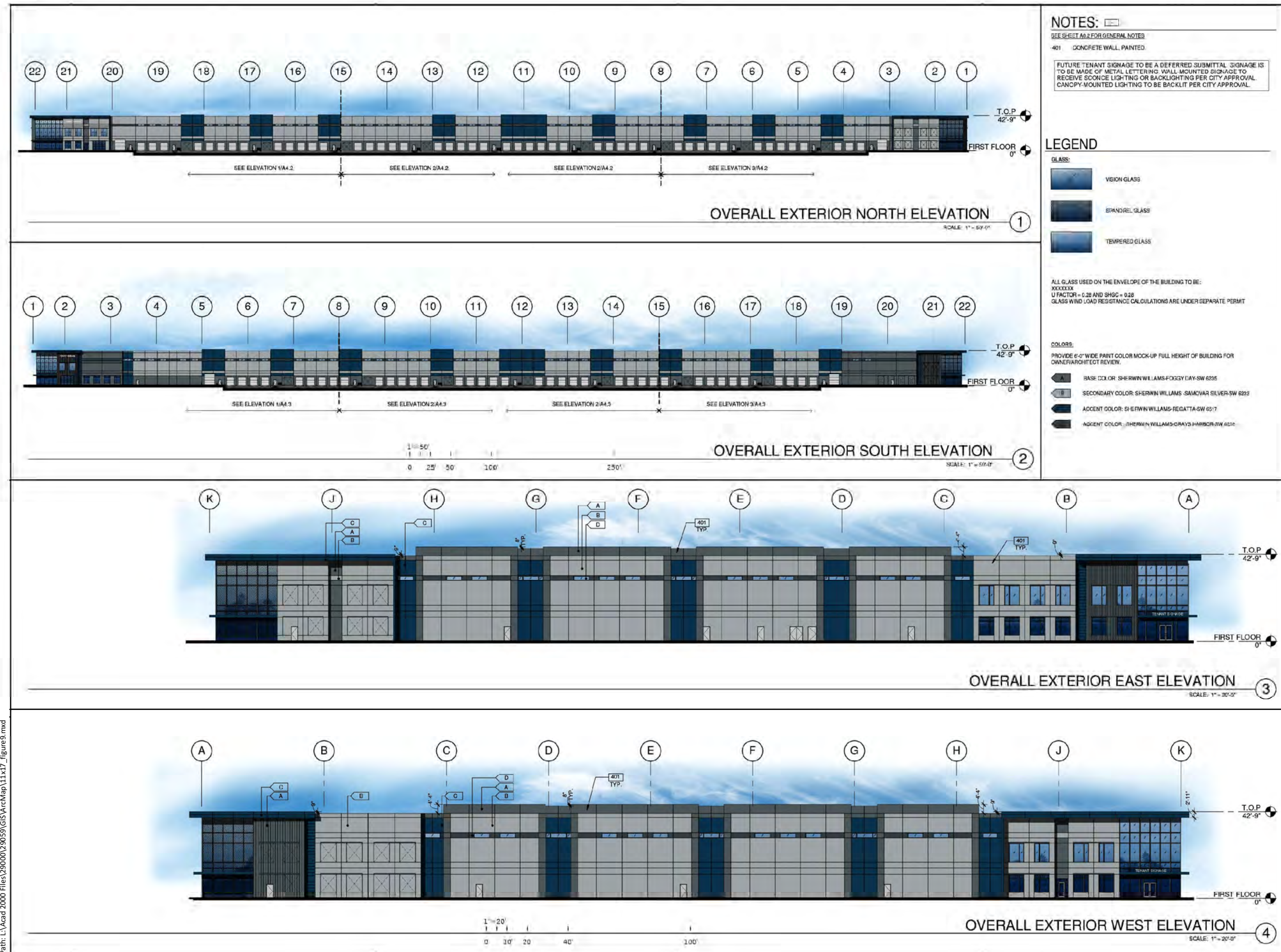


Figure III-11.
Exterior Elevations
1000 Gibraltar Ave
City of Milpitas, California



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Sources: DigitalGlobe 2016 Aerial, WRA | Prepared By: JSChuster, 4/2/2020

Exterior Elevations



WRA
ENVIRONMENTAL CONSULTANTS





Source: Overton Moore Properties, 2020

**Figure III-13. Visual Rendering of the Proposed Project
Looking to the Northwest**

1000 Gibraltar Drive
City of Milpitas, California



Source: Overton Moore Properties, 2020

**Figure III-14. Visual Rendering of the Proposed Project
Looking to the Southeast from South Milpitas Boulevard**

1000 Gibraltar Drive
City of Milpitas, California



Source: Overton Moore Properties, 2020

**Figure III-15. Visual Rendering of the Proposed Project
Looking to the East from South Milpitas Boulevard**

1000 Gibraltar Drive
City of Milpitas, California



**Figure III-16. Visual Rendering of the Proposed Project
Looking to the Northeast from Gibraltar Drive**

Source: Overton Moore Properties, 2020

1000 Gibraltar Drive
City of Milpitas, California



Figure III-17.
Stormwater Quality Control Plan

1000 Gibraltar Drive
City of Milpitas, California

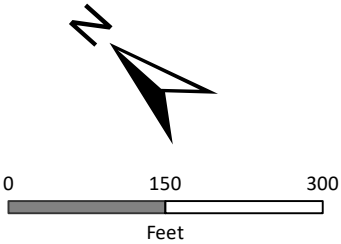
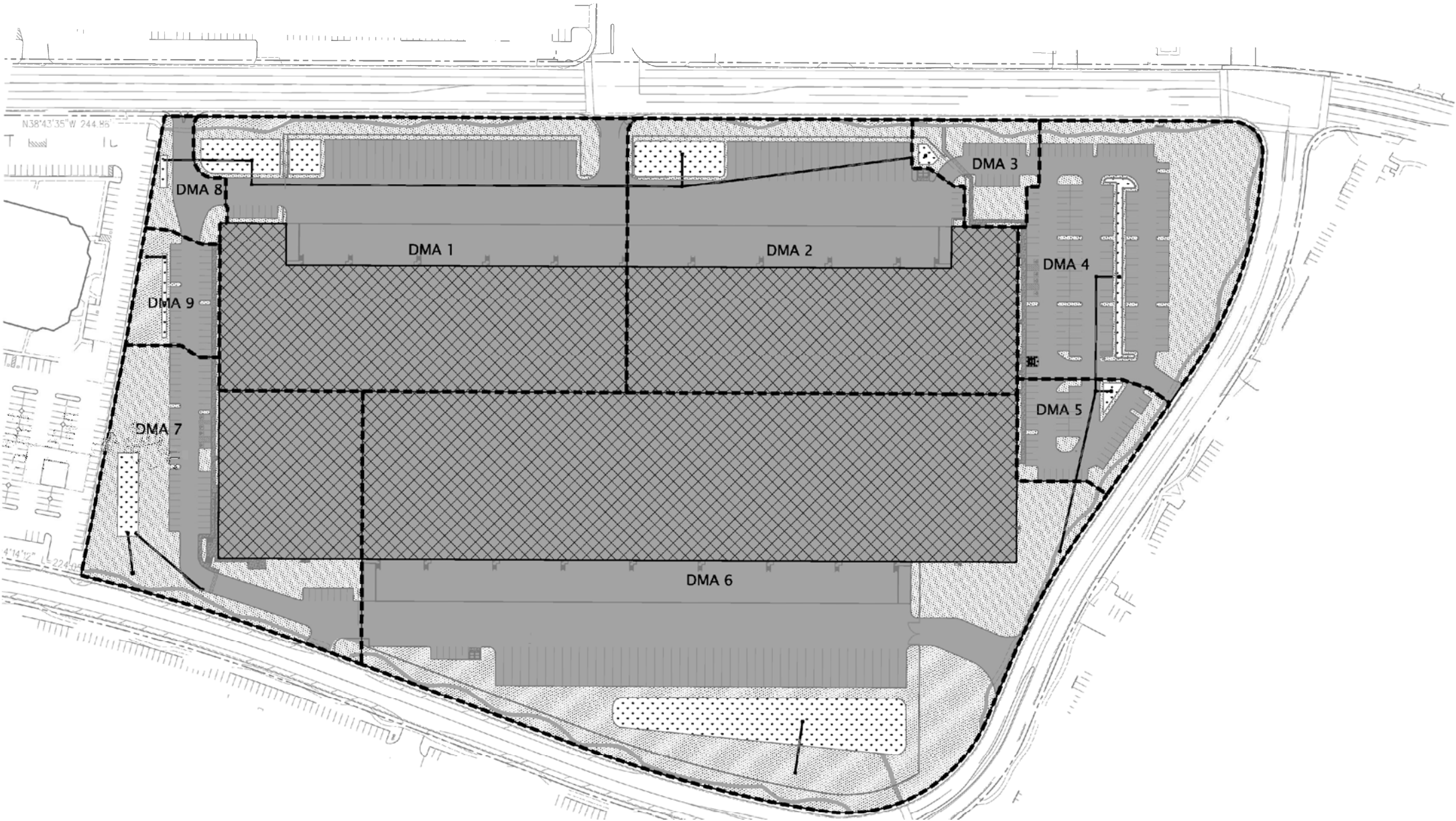
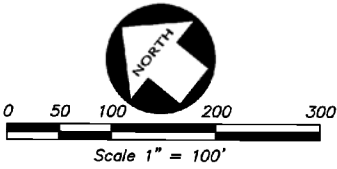
BIO-RETENTION SIZING CALCULATIONS

| Area No. | Area (SF) | Area (AC) | Landscape (SF) | Landscape (AC) | Imperv. (SF) | Imper. (AC) | Treatment Area* (SF) | Treatment Provided (SF) | Sizing Ratio (%) | Type of Planter |
|----------|-----------|-----------|----------------|----------------|--------------|-------------|----------------------|-------------------------|------------------|-----------------------|
| 1 | 231,593 | 5.317 | 20,921 | 0.480 | 210,672 | 4.836 | 212,764 | 7,589 | 0.036 | Bio-Retention Planter |
| 2 | 201,860 | 4.634 | 13,584 | 0.312 | 188,276 | 4.322 | 189,634 | 6,451 | 0.034 | Bio-Retention Planter |
| 3 | 21,468 | 0.493 | 11,756 | 0.270 | 9,712 | 0.223 | 10,888 | 630 | 0.058 | Bio-Retention Planter |
| 4 | 115,136 | 2.643 | 46,360 | 1.064 | 68,776 | 1.579 | 73,412 | 2,941 | 0.040 | Bio-Retention Planter |
| 5 | 26,961 | 0.619 | 6,763 | 0.155 | 20,198 | 0.464 | 20,874 | 643 | 0.031 | Bio-Retention Planter |
| 6 | 499,576 | 11.469 | 102,094 | 2.344 | 397,482 | 9.125 | 407,691 | 25,844 | 0.063 | Bio-Retention Planter |
| 7 | 131,410 | 3.017 | 44,187 | 1.014 | 87,223 | 2.002 | 91,642 | 3,600 | 0.039 | Bio-Retention Planter |
| 8 | 13,686 | 0.314 | 5,260 | 0.121 | 8,426 | 0.193 | 8,952 | 458 | 0.051 | Bio-Retention Planter |
| 9 | 19,688 | 0.452 | 9,509 | 0.218 | 10,179 | 0.234 | 11,130 | 780 | 0.070 | Bio-Retention Planter |

*: Total Treatment Area is equal to impervious Area + 0.10 * Landscape Area.

LEGEND

- TRIBUTARY AREA LIMITS
- LANDSCAPE AREA
- IMPERVIOUS ROOFTOP DRAINING TO BIO-SWALE
- IMPERVIOUS PAVEMENT
- BIO-RETENTION TREATMENT AREA



D. PROJECT OBJECTIVES

The objectives of this proposed Project are as follows:

- To redevelop and maximize the buildout potential of an underutilized property and reduce existing blight thereby providing for a range of potential uses including light industrial, manufacturing, warehouse or e-commerce
- Construct an infill development of up to approximately 500,000 square feet exhibiting quality design, consistency with the designated land use and zoning and compatibility with the surrounding land uses.
- Develop a Project that is consistent with the Milpitas General Plan and the surrounding uses.
- Attract new employment-generating businesses to Milpitas to help create more equal jobs-housing balance in Milpitas and reducing the need for residents to commute outside the area for employment.
- Implement the City of Milpitas desire to create new uses that generate additional revenue and help Milpitas and other public agencies achieve fiscal balance.
- Develop a logistics center that is in close proximity to nearby truck routes and freeways, minimizing vehicle miles travelled on the streets in order to facilitate the efficient movement of goods, which is recognized as a strong benefit for local and regional economic growth.
- Satisfy the substantial demand for a logistics center building that is both physically and economically feasible to construct and operate, that is attractive to potential users and economically competitive with other geographic markets.
- To help improve the quality of life for Milpitas residents through job creation, revenue generation and other associated Project benefits.
- Generate local employment opportunities, both in short-term construction employment and long-term Project employment.

E. DISCRETIONARY ACTIONS

This Draft EIR serves as the environmental document for all discretionary actions associated with the development of the proposed Project. This Draft EIR is intended to cover all federal, state, regional, and/or local government discretionary approvals that may be required to develop the proposed Project, whether or not they are explicitly listed below. The federal, state, regional and local agencies that may have jurisdiction over the proposed Project may include, but are not necessarily limited to the following:

- Site Development Permit P-SD19-0008
- Tree Removal Permit P-TR19-0017

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